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Environmental Protection Authority
Peel Harvey Water Quality Improvement Plan Submission
Locked Bag 33
Cloisters Square
Perth WA 6850

By email: policy@dec.wa.gov.au

To whom it may concern:

Draft Water Quality Improvement Plan for the Rivers and Estuary of the Peel-Harvey System

The Urban Development Institute of Australia (UDIA (WA)) is the peak industry body representing the property development industry in Western Australia. UDIA (WA) is pleased to have the opportunity to respond to the *Draft Water Quality Improvement Plan* (WQIP) as the activities of our members developing projects in the affected region may be impacted by the proposed policy.

This response focuses on those items that are pertinent to the development industry and are based on feedback from developers and consultants operating in the Peel-Harvey area.

Response to Action Items

Item 3 Use low water soluble fertiliser in urban areas

The draft WQIP proposes that the use of low water soluble fertiliser in domestic gardens will reduce nutrient input into the Peel-Harvey system. UDIA (WA) recommends the benefits of a broad-scale, ongoing public education process in new and existing urban areas to ensure that existing householders limit their nutrient applications and that new householders continue good practices in new developments after the developer leaves. A Water Sensitive Urban Design (WSUD) retrofit process would also be useful, but probably not as effective in terms of weight of phosphorus removed per dollar spent.

It is UDIA's experience that effective public education can have a positive impact on residents' behaviour once they understand the advantages to be gained from a behaviour change. Members in other environmentally sensitive areas report significant environmental gains have been achieved where community education through smart garden workshops, landscaping guidelines, provision of low water soluble fertiliser to householders and school garden projects have been undertaken. Our research also indicates that households are willing to pay a small premium for sustainability measures to be incorporated into new developments.

A similar approach could be initiated in the Peel-Harvey for both new residential developments and existing households so that the greatest gains can be made.

**Item 4 Connect all existing homes to infill sewerage,
and**

Item 8 Connect to sewerage all homes and properties for new urban developments

The WQIP asserts that the Peel-Harvey river system is impacted by increased phosphorous levels through the use of septic tanks in urban areas. It is a condition of subdivision that residential lots around the Peel Harvey Estuary be connected to the reticulated sewer system so it is unlikely that new residential development will contribute in any way to phosphorous inputs via septic tanks. Rural lots however still rely on septic tanks and older lots created more than 20 years ago had septic tanks and leach drains. Their replacement by reticulated sewerage is the province of the utility providers rather than the development industry.

Item 9 Undertake soil remediation in all new urban developments with sandy soils

UDIA (WA) supports the remediation of soil in new developments on the garden areas of a lot if there is a proven reduction in nutrient runoff. It makes no environmental or commercial sense to require an entire lot to be remediated when the majority of the lot will be covered by a house pad thereby eliminating the possibility of phosphorous or other nutrients filtering through to the groundwater.

EPA should be mindful that the requirement for remediation will add a significant amount to the cost of a lot. UDIA (WA) has estimated the additional cost to be from \$900 per lot where the remediation material is crushed limestone, to more than \$1,500 where organic matter is used¹. The material would also need to be 'topped up' regularly adding further costs for new households in the affected areas. The latest Urban Development Index (September Quarter 2007)² indicates the average cost of land sold in the Shire of Harvey was approaching \$151,000 so the requirement for remediation adds a significant cost impost to affordable land in this area.

Item 10 Implement Local Planning Policies, Strategies and Planning Conditions that incorporate Best Management Practices where applicable

and

Item 11 Incorporate water sensitive urban design in all new developments

The Peel Harvey WSUD Local Planning Policy (LPP) forms the framework for integrating WSUD into development in the Peel Harvey. The LPP contains a number of Interim Environmental Quality Criteria. These criteria include items such as potable use and nutrient attenuation requirements that developers must meet or attempt to meet to gain approval. The LPP indicates that the criteria are in place until the finalisation of the WQIP. However, apart from including the LPP verbatim, the issue of appropriate Environmental Quality Criteria is not addressed in the WQIP. UDIA recommends that the EPA addresses this issue before finalising the WQIP.

¹ Based on a 600sqm lot, with garden areas of 200sqm and requiring 20 cubic metres of remediation material

² The UDI is a quarterly publication produced by UDIA (WA) based on data collected from 38 major developers in WA of lots sold, lots on the market, lots not on the market and lots to be released over the coming 6 to 12 months.

Consistency in policy across jurisdictions is important to the development industry as it facilitates and streamlines the timely development of land. It is important to developers that they have a clear understanding of the frameworks within which they must operate and that compliance for one level of approval is not duplicated or conflicted by requirements in another. It is the expectation of industry that the Peel-Harvey Coastal Catchment Water Sensitive Urban Design Guidelines are entirely consistent with the *State Water Plan 2007*, the *State Water Strategy 2003*, the *State Planning Strategy 1997*, *Liveable Neighbourhoods Edition 3* and *State Planning Policy 2.9 Water Resources 2006*.

UDIA (WA) is concerned that assessing WSUD is within the capacity of inexperienced Department of Water officers and Local Government officers as it is at this level of approval that delays, and subsequently increased costs, most frequently occur. Industry also has reservations about the adequacy of the level of monitoring carried out in the Peel Harvey catchments and recommends the implementation of monitoring programs and pre-development groundwater quality data before a requirement for WSUD is placed on development.

We hope you find these comments instructive and look forward to viewing the final WQIP in due course.

Yours sincerely

A handwritten signature in black ink that reads "Debra Goostrey". The signature is written in a cursive style with a large initial 'D' and a stylized 'G'.

Debra Goostrey
CEO UDIA (WA)