

e [udia@udiawa.com.au](mailto:udia@udiawa.com.au) Urban Development Institute of Australia  
t 08 9321 1101 (Western Australia)  
f 08 9321 1102 Level 5, 150 St Georges Terrace,  
w [www.udia.com.au](http://www.udia.com.au) Perth, Western Australia 6000



20th November 2007

Mr James Yuen  
Department of Water  
The Atrium, 160 St George's Terrace  
Perth WA 6000

By email: [james.yuen@water.wa.gov.au](mailto:james.yuen@water.wa.gov.au)

Dear James

**Re: National Guidelines for Evaluating Water Sensitive Urban Design (WSUD)**

The Urban Development Institute of Australia (UDIA (WA)) is the peak body representing the property development industry in Western Australia and we are pleased to offer qualified endorsement of the draft National Guidelines for Evaluating Water Sensitive Urban Design (BMT WBM, November 2007) produced under Clause 92 of the National Water Initiative (NWI), particularly as they seek to provide a consistent framework to apply nationally to the facilitation and evaluation of WSUD proposals.

UDIA (WA) participated in the Stakeholder Reference Group on Water Sensitive Urban Design on the Swan Coastal Plain during 2006-07. This reference group provided input into the Urban Water Management Framework for the Swan Coastal Plain that was drafted in partnership between the state Department of Planning and Infrastructure and the Department of Water, the WA Local Government Association and the Federal Department of Environment and Heritage.

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. UDIA (WA) anticipates that the National Guidelines will be entirely consistent with local WSUD requirements and are supported by 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*.

The National Guidelines will be useful in assisting developers, consultants and assessors to identify issues that need to be addressed and/or considered when designing or evaluating a WSUD project. A smooth approvals process ultimately benefits the consumer and UDIA (WA) gives its full support to an approach that facilitates this outcome, particularly in the context of declining housing affordability in new development areas which will likely be influenced by WSUD.

UDIA (WA) is particularly 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. The guidelines provide a comprehensive analysis of a range of WSUD approaches accompanied by detailed bibliographies and guidance material which would be useful references for assessment officers. Further work needs to be completed on Chapter 6 – WSUD Risks and Issues and Chapter 7 – Monitoring. Industry has reservations about the adequacy of the level of monitoring carried out by the Department of Water, particularly in relation to the Peel Harvey and Leschenault Catchments. Industry must have a high degree of confidence in monitoring programs and pre-development groundwater quality data before a requirement for WSUD is placed on development.

UDIA (WA) appreciates the importance of total water cycle management to sustainable urban development and we acknowledge that our industry has an important role to play in ensuring responsible water management in an anticipated environment of reduced rainfall and more frequent storm events. It is critical that the national guidelines do not take precedence over local criteria which we believe are better understood and addressed by State government policy or regulation. The Department of Water should therefore be proactively undertaking works to support the national guidelines so that an integrated approach to WSUD can be achieved.

We hope you find these comments instructive and look forward to viewing the final National Guidelines for Evaluating WSUD in due course.

Yours sincerely

A handwritten signature in black ink, appearing to read "Debra Goostrey". The signature is stylized with a large initial 'D' and a trailing flourish.

**Debra Goostrey**  
CEO UDIA (WA)