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Mr Leon Brouwer  
Regional Manager, Kwinana Peel  
Department of Water  
Peel Waterways Centre  
Suite 6/21 Sholl Street  
Mandurah WA 6210

Via email: [pwc@water.wa.gov.au](mailto:pwc@water.wa.gov.au)

Dear Leon

### Peel Harvey Eastern Estuary Catchment Environmental Assessment

The Urban Development Institute of Australia (WA) is pleased to provide the following comments on the Department of Water's *Peel Harvey Eastern Estuary Catchment Environmental Assessment* project. UDIA is the peak body representing the property development industry in Western Australia with a membership drawn from the land development, planning, engineering, environmental and urban design professions.

UDIA's Urban Water Committee recently viewed a presentation on the project by Adrian Parker of the Department of Water and two members of the URS consultant team. The *State of Play* discussion paper was also distributed to our members for review. Comments are as follow:

- The document shows no recognition of the benefits of Water Sensitive Urban Design and should remove negative statements relating to urban development to show greater recognition of the benefits that WSUD bring to development.
- The industry does not accept that urban development contributes as much nutrient input as farms and proposes that such suggestion be removed from the document. 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 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.
- The information contained in the document is a reshuffle of information that has been available for some time and does not advance the understanding of the region or the potential for urban development therein.
- While the document is intended to be used as a guidance document and not policy, it is the opinion of our members that the document does not provide reliable or up to date data to provide effective guidance for urban development.

- Industry has no confidence in recommendations made in the document as they do not provide the data industry requires.
- It would be disappointing if this document becomes a constraint to development in the Peel-Harvey region.

UDIA recommends in the strongest possible terms, that the Department of Water actively seek sufficient funding from government to carry out extensive data collection in the Peel - Harvey catchment so that the document can make clear and justifiable recommendations. The draft document clearly indicates that not enough is known, that more science is required and that a lot more work needs to be done for the report too add to existing knowledge so that future activity in the region is informed by real information. The South Metropolitan Growth Framework must also be completed to complement the work done by the Department of Water.

I hope you find the comments instructive.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Debra Goostrey', with a stylized flourish at the end.

Debra Goostrey  
Chief Executive Officer