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Dear Adrian

### **Draft Floodplain Development Strategy to inform the Murray Drainage and Water Management Plan**

The Urban Development Institute of Australia (UDIA WA) met yesterday with the Department of Water (DoW) to provide peer discussion of the *Draft Floodplain Development Strategy to inform the Murray Drainage and Water Management Plan*. This letter is a summary of the outcomes of the meeting and, in conjunction with the meeting, constitutes UDIA's formal response to the draft document.

#### **Impact of the document on land use planning in the Peel Region**

UDIA's overriding interest in this document is its application to land use planning. The Peel region, and particularly the Shire of Murray, is under intense development pressure with increasing rates of population and household growth projected for the coming decades. The flood, groundwater and ecological water requirement studies that inform the Murray DWMP will directly impact future urban development and the assessment of structure plans in the area.

UDIA fully endorses the concept of the flood study being a 'living' document that proponents can update with data for development proposals. As you are aware, there are extensive landholdings in the area identified for urban development and the adoption of the 'living' document model precludes the possibility of areas being sterilised from development where they meet the required criteria. This approach will provide certainty to the development industry as well as the flexibility to respond to demand changes. UDIA has been advocating for performance based assessment based on sustainability criteria for residential and industrial development in the Peel region for some time and the 'living' document approach proposed by DoW supports this methodology.

#### **Other comments**

1. UDIA encourages DoW to publish the final flood study report as soon as possible.
2. The process described by the DoW officers for refining the flood strategy (particularly the floodway itself) should be clarified. Presently there is no formal commitment by DoW, or

the Minister, to a system for landholder initiated refinement of the model. UDIA requests some certainty from DoW regarding the flood model (MIKE21).

3. UDIA seeks confirmation that DoW owns the Intellectual Property for the model.
4. UDIA seeks confirmation that DoW will make available editable copies of the model to third parties (eg landholders and their consultants) within a stated timeframe (to be clarified) of publication of the final report.
5. UDIA seeks confirmation that DoW will review submissions made by third parties (timeframe should be clarified) proposing refinements to the model.
6. UDIA seeks confirmation that DoW will put in place a system for tracking the latest version of the model.

If UDIA can obtain assurance from DoW that these steps will be taken, it will give some confidence to the industry that the new flood study will be a 'living' document which will undergo refinement for a number of years before it will be necessary to update it. This is important as it highlights to other agencies that refer to the document (for example, DoP, DEC, local councils and others) that the document will evolve over time as more information becomes available.

The alternative of it being published and reviewed every 5 years would not be acceptable to the industry, especially given that so few changes have been made to the floodway in the draft report. One would expect a commensurate change in the floodway to the dramatic reductions in the design of 100 year floods in the Serpentine and Murray Rivers as compared with the earlier studies.

Thank you again for the opportunity to provide feedback, we trust you will find these comments instructive and we look forward to the finalisation of the Murray DWMP.

Yours sincerely



**Debra Goostrey**  
Chief Executive Officer

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