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Gnangara Sustainability Strategy Taskforce  
Department of Water  
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To whom it may concern

## **GNANGARA SUSTAINABILITY STRATEGY**

The Urban Development Institute of Australia (UDIA WA) is pleased to make this submission on the Gnangara Sustainability Strategy (GSS). UDIA is the key representative body of the land development industry in Western Australia with members drawn from the land development, planning, engineering, urban design, legal and financial professions.

In order to provide a considered response to the GSS, UDIA canvassed the views of members who are operating in the area. The need for the GSS in a drying climate is obvious and while it is supported by the industry, particularly the need for groundwater replenishment and aquifer recharge schemes, concerns have been raised about the burden imposed on private landowners and the lack of compensation as a result of the recommended trade-offs. While we agree that a whole-of-community response is required to support the GSS, the view of our members suggests the responsibility for achieving this is not to be shared equitably between competing uses and falls unduly on private landowners.

The key issue is the proposed ecological linkage displayed on Figure 11 which in some areas crosses farmland and areas of residential development. The proposed protection of existing blocks of remnant bushland to support threatened species effectively sterilises that land for future urban development and UDIA would like to alert the GSS to this effect. UDIA assumes that this land is suitable for the purpose of providing the required ecological linkages. We refer you to the alternative scheme proposed by National Lifestyle Villages in their submission as a viable alternative to that proposed by the GSS.

UDIA would like assurance that the land identified for ecological linkages has been brought to the attention of WAPC so that it is aware of land availability for the sub-regional structure planning that is to be shortly carried out for the North East and North West metropolitan sub-regions. *Directions 2031 – Draft Spatial Framework for Perth and Peel* (WAPC June 2009) imposes an ambitious 15 dwelling units per hectare in greenfield areas as an urban development target and the loss of large tracts of land to other uses makes this target impossible to achieve. As the onus is on developers to provide required densities, the loss of this land has implications for the development potential of land and market access to affordable land and housing.

UDIA would like to alert the Department of Water to the fact that the Department of Planning (DP) and the Department of Environment and Conservation (DEC) are currently working with the Federal Department of Environment, Water, Heritage and The Arts (DEWHA) to set aside areas for the protection of the Carnaby's Black Cockatoo and other listed species. While an agreement has yet to be finalised, the conservation areas for this purpose are likely to fall within the GSS area and the GSS should take this into consideration when setting aside other conservation areas which will impact on areas available for urban development.

UDIA would like to apologise for the delay in providing this submission but trust that it will be given due consideration when finalising the GSS. The Department of Water are valued members of UDIA and we congratulate you on the work undertaken for the Strategy and we look forward to the final document.

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