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6 September 2010

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To whom it may concern

### Draft Policy SRT/D4 – Stormwater Management

The Urban Development Institute of Australia (UDIA WA) is pleased to provide comment on the draft Stormwater Management Policy for the Swan Canning Catchment. 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.

UDIA appreciates the purpose of the draft stormwater management policy is to protect the environmental health and community benefit of the Swan and Canning River system. We believe stormwater is competently managed by existing policies and strategies directed by the Department of Water specifically *Stormwater Management Manual for Western Australia* (2004-07) and *Decision Process for Stormwater Management in WA* (2009) and the Western Australian Planning Commission's *Better Urban Water Management* (2008). UDIA supports the constructive dialogue the Trust is having with the Department of Water on a range of issues and we respectfully suggest the SRT endorses DoW as the approval authority for all stormwater related issues.

UDIA's Urban Water Committee, composed of senior engineers and hydrologists working in urban water management and planning, were alarmed to read this draft policy and are unconvinced that any additional benefits will be gained by its application, it simply imposes an additional and unnecessary layer of policy. We counsel the SRT to reconsider the need for the policy and to continue to work closely with relevant government agencies to make your needs understood by these agencies. There are real gains being made by WAPC in streamlining the approvals process by eliminating outdated policies and those that conflict with other policies. The SRT's approach, adding complexity to the approvals system, runs counter to the gains being made in other jurisdictions.

Yours sincerely

A handwritten signature in black ink, which appears to read 'Debra Goostrey', is written over a light grey circular stamp. The signature is fluid and cursive.

**Debra Goostrey**  
Chief Executive Officer