

e [udia@udiawa.com.au](mailto:udia@udiawa.com.au)  
t 08 9321 1101  
f 08 9321 1102  
w [www.udiawa.com.au](http://www.udiawa.com.au)

Urban Development Institute of Australia  
(Western Australia)  
Level 5, 150 St Georges Terrace,  
Perth, Western Australia 6000



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General Manager  
Swan River Trust  
PO Box 6829  
East Perth WA 6892

By email: [planning@swanrivertrust.wa.gov.au](mailto:planning@swanrivertrust.wa.gov.au)

To whom it may concern

### **Draft Policy SRT/D20 – Nutrient Offset Policy for the Swan Canning Catchment**

The Urban Development Institute of Australia (UDIA WA) is pleased to provide comment on the draft Nutrient Offset 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 questions the need for this policy as it defies the overall objectives of the State Government which has recognised the need to streamline existing processes and to review the policy capacity of agencies (report of Economic Audit Committee, October 2009). Priority actions of the *Building a Better Planning System* (Department of Planning and Infrastructure, 2009) are to reduce policy complexity and to remove duplication of policy between levels of government and between different government agencies. The draft policy adds a layer of complexity that is superfluous and redundant as nutrient management is managed by both the Department of Water and the Department of Environment and Conservation. While UDIA appreciates the Trust's overriding goal is to improve water quality in the Swan Canning catchment it is our view that nutrient management is already well controlled by DEC and DoW and the Trust should respect the existing policy and technical expertise of these agencies and directly engage with them.

Following review of the draft policy, UDIA (WA) offers additional comments:

- The draft policy would be difficult to implement and verify. The lack of an appropriate model to predict the impact of nutrient input at the local level could result in significant time delays resulting in increased costs.
- The policy is premature as the nutrient model is yet to be developed by the SRT. There is an expectation that proponents will "over-compensate" offsets due to the uncertainty associated with the lack of a robust model. This will incur additional costs and generate uncertainty, with no clear or definable environmental outcomes.
- The lack of a model or agreed method in WA to assess and compare the pre- and post-development nutrient loads that may or may not be contained within stormwater runoff is problematic. The DoW, WAPC and DEC all accept nutrient management is undertaken by implementing "best management practices" where effort is made to control nutrients. There remains a serious gap in any scientific approach to this issue in WA. Even with a

model, it will be almost impossible and quite impractical to attempt a menu driven offset calculator.

- UDIA is aware that the Department of Water is due to commence development of a model specific to WA conditions, and we believe the adoption of the policy should be delayed until such time as an industry-accepted model is in place. In the interim, we believe the Swan River Trust should engage with the best practice approach to nutrient management being applied by existing development approval requirements such as the Local Water Management Strategies (LWMS), Urban Water Management Plans (UWMP) and Nutrient and Irrigation Management Plans (NIMP). Nutrient management is included as a key requirement of these plans.
- We do not support nutrient offsets being considered on a case by case basis as this will introduce variability and uncertainty regarding requirements.
- UDIA disputes that new residential development contributes to water quality degradation as runoff is contained onsite and nutrient management is required by Local Water Management Strategies and Urban Water Management Plans as cited above.
- New developments are generally comprised of small lots, many with water sensitive plantings including native species. They are also likely to be located further from the Swan River than established residential areas comprised of large blocks with lawn and exotic species that require fertiliser.
- UDIA is extremely concerned that any offset imposts will increase development costs and seriously affect the affordability of housing in Perth

UDIA appreciates the purpose of the draft nutrient offsets policy is to protect the environmental health and community benefit of the Swan and Canning River system by improving water quality. We believe nutrients are competently managed by existing policies and strategies directed by the Department of Water and the Department of Environment and Conservation. We caution against the imposition of an additional layer of policy that is in conflict with the State Government objective to reduce policy complexity and to simplify the approvals process and respectfully suggest that the best approach is to continue dialogue with the Department of Water and the Department of Environment and Conservation and to utilise their existing policies.

We trust you will give UDIA's comments due consideration in your final deliberations.

Yours sincerely



**Debra Goostrey**  
Chief Executive Officer

Cc: Chair WAPC  
Minister for Water  
Minister for the Environment  
Greg Davis, Department of Water