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Mr. Daniel Simms
Chief Executive Officer
City of Wanneroo
23 Dundebur Road
Wanneroo WA 6065

By email: enquiries@wanneroo.wa.gov.au

Dear Daniel

DRAFT LOCAL PLANNING POLICY 4.4: URBAN WATER MANAGEMENT AND CITY WATER MANAGEMENT STRATEGY

The Urban Development Institute of Australia is pleased to provide comment on the draft LPP 4.4: Urban Water Management and City Water Management Strategy. The policy applies to all planning proposals for residential, commercial, industrial or rural-residential zoning, sub-division or development within the City of Wanneroo.

Comment

Review of the draft policy indicates a requirement for landscaping of public open space with a drainage function to be completed prior to clearance of subdivision conditions. UDIA objects strongly to this requirement as it will result in delays of months which will hold up development schedules and ultimately impact on the cost of land to the purchaser.

Conceptual landscaping design is generally undertaken up front prior to civil design to provide information for marketing purposes while detailed landscaping design is not in most instances undertaken until such time as civil design is completed and works commenced onsite. Even then final design of the landscaping plans are sometimes left until after the civil works are completed to ensure levels, site conditions, services are located correctly to avoid additional design work and onsite work. It is common practice in other local government areas for stages to be completed and titled with drainage pipes and interim basins installed and landscaping works to follow. There is no benefit to be gained from altering the construction timeframe as proposed by the draft policy.

There are a number of reasons why landscaping is generally not commenced onsite until after civil contractors are out of the way. These include:

- The civil works associated with the POS are undertaken as a progressive part of the entire stage development and will require servicing, compaction, filling, earth working.

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- Civil contractors are given site possession to undertake civil works across the site and therefore have control of the site. Civil contractors are generally reluctant to allow another party access to the site to undertake works onsite if they are not part of the civil contractor's contract.
- POS sites will be used for the filling of water trucks, machinery lay down areas, and transport tracks as there is a lack of services in the area and when sites are tight to work on these areas provide additional space for contractors to work, thus reducing costs.
- Drainage is placed into POS and the pipe work and earthworks associated with this require significant earthworks to be undertaken and are a roll-on from work being undertaken in the greater subdivision stage. Until these are finished landscape construction is unable to be undertaken as the machinery will ruin any landscape work undertaken.

POS construction is time consuming and detailed and in most cases will take up to 12 weeks to complete a relatively small job that costs say, \$300,000. Under the draft policy POS works are not able to be commenced until civil works have been substantially completed and this will add significant time onto the completion of a stage. Were the draft policy to be followed we estimate a 40 lot stage would take more than 6 months to settle whereas under usual practice the stage could be completed and settled in 4 months. This is an unnecessary delay that adds significant costs to a project.

In relation to concerns regarding drainage, the City only needs to ensure that the civil plans indicate where the drainage basin will be located in the POS, the location of the pipe and that the pipe is constructed at the correct invert level and a basin with the correct capacity is constructed. The basin does not necessarily need to be the final design, but it must be large enough to contain the stormwater that will result from the development prior to landscaping being completed. The drainage function can be accommodated as part of the civil works with landscaping to follow.

UDIA requests that the City reconsiders its position in relation to clearance of POS with a drainage function as it has serious implications for the industry's capacity to deliver land to the market in a time efficient manner. The requirement will blow out development timelines and result in higher costs to purchasers with negative consequences for housing affordability.

Yours sincerely



Debra Goostrey
Chief Executive Officer