

Response ID ANON-4EM2-EKBG-H

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-10 09:54:18**

Your details

1 What is your name?

Name:

Helen Shield on behalf of Sandra Brewer

2 Can we publish your response?

Yes, you may publish my response in full

3 What is your email address? (optional)

Email:

[REDACTED]

4 What is your postcode? (optional)

Postcode:

[REDACTED]

5 Do your views officially represent those of an organisation?

Yes, I am authorised to submit feedback on behalf of an organisation

If yes, please specify the name of your organisation.:

Property Council of Australia, WA Division

6 Which of the following best describes the group or person you represent?

Peak industry body

If other, please specify.:

7 Which of the following best describes the sector you represent?

Development / Construction

If other, please specify.:

8 Are there specific parts of your submission that you want to keep confidential?

If yes, please outline which specific parts of your submission must be kept confidential and explain why. :

No

A State native vegetation policy

9 Referring to the proposed policy objective statements below, how well do you support each one in guiding our development of a policy?

Objective 1 matrix - Objective 1:

Strongly supported

Please explain in the text box below.:

We support the maintenance of high-quality database that records native vegetation, clearing and rehabilitation efforts across WA as a crucial tool for ensuring that decision making is evidence-based and there is an appropriate balance between cultural, social, environmental and economic outcomes.

Objective 2 matrix - Objective 2:

Strongly supported

Please explain in the text box below.:

We recognise the importance of Western Australia as a global bio-diversity hotspot and we support a properly funded effort to maintain this.

Objective 3 matrix - Objective 3:

Supported

Please explain in the text box below.:

10 What opportunities are presented by the development of a State Native Vegetation Policy focused on how government manages vegetation?

Please provide your answer in the text box below.:

The State Government has an opportunity to ensure its planning, environmental, transport and other functions are aligned to reduce duplication, create clarity and eliminate excessive regulation. It should be possible to ensure protection for native vegetation without creating excessive layers of regulation for those charged with providing infrastructure, whether it be roads, buildings or housing.

Better information

11 How do you use native vegetation data within your sector? (Choose as many options as you require)

To inform applications to clear or impact vegetation, For baseline information for monitoring

If you have chosen 'other', please specify:

12 Which of the following elements of better information provision would be most relevant to your sector? (Choose as many options as you require)

Cost saving, Timeliness of assessments, Evidence-base for decisions

If you have chosen 'other', please specify:

13 What other opportunities are presented by improved information and improved access to information?

Please provide your answer in the text box below.:

High quality, well maintained information that is freely available to industry, governments, researchers and members of the community is a powerful tool for good decision-making and has the potential to save time and money.

Better regulation

14 Which of the following elements of better regulation would be most important to your sector? (Please rank your top three)

Rank better reg elements - Improved protection for native vegetation:

Rank better reg elements - Ensuring development is sustainable:

Rank better reg elements - Streamlined regulation for cost saving:

3

Rank better reg elements - Clearer requirements for business certainty:

Rank better reg elements - Improved assessment timeframes:

Rank better reg elements - Transparent, evidence-based decisions:

Rank better reg elements - Improved compliance and enforcement of unauthorised clearing:

Rank better reg elements - Equitable treatment of all proponents:

Rank better reg elements - Confidence in the regulatory system for all stakeholders:

2

Rank better reg elements - Other:

1

If you selected Other, please provide further information.:

That there is a single, efficient, cost-effective environmental approval process giving construction and housing developers a clear understanding of what will be required and that this eliminates duplication (and delays) between government departments, for example planning and water and environmental regulation, and between layers of governments, for example State and Commonwealth.

Multiple levels of regulation and environmental assessments cause delays, impose excessive costs and contribute to the higher cost of housing for those who can least afford it.

15 What other opportunities are presented by better regulation?

Please provide your answer in the text box below.:

Better regulation should allow for a single process across departments and governments with clear, transparent requirements and a clear pathway to approval or rejection. Property Council WA members need a clear understanding of whether an area can be developed (or not) and a transparent pathway to approval.

A bioregional approach

16 Which of the following elements are the most important to you/your sector? (Please rank your top three)

Rank bioregional elements - 1. Transparent outcomes and objectives:

Rank bioregional elements - 2. Leveraging local knowledge:

2

Rank bioregional elements - 3. Strategic and innovative approach to conflicting interests:

Rank bioregional elements - 4. Clear targets and thresholds:

1

Rank bioregional elements - 5. Planned approach to dealing with cumulative impacts:

Rank bioregional elements - 6. Effective monitoring and evaluation framework:

3

Rank bioregional elements - 7. Supporting public-private partnerships for conservation:

Please explain in the text box below.:

Property Council WA believes that a centralised database with contemporary, up-to-date information about native vegetation, clearing and rehabilitation is a powerful tool for informed decision-making. We believe this information should be freely available to allow for greater transparency and accountability, that the pathway to development should be clear, efficient and cost-effective, and that the industry can work with scientists, conservationists and traditional owners to achieve balanced outcomes.

17 What other opportunities are presented by a bioregional approach?

Please explain in the text box below.:

A bioregional approach has the potential to leverage local community and traditional owner knowledge to better preserve and enhance biodiversity.

18 What concerns are presented by a bioregional approach, for your sector?

Please explain in the text box below.:

Our sector is concerned that there are a consistent set of guidelines and efficient and cost-effective pathways to ensuring preservation of species AND timely development.

Other initiatives

19 What initiatives do you think would work best to improve native vegetation outcomes in your region?

Pricing, incentives and markets (e.g. biodiversity banking, offsets, carbon farming etc), Aboriginal land management, Nature-based or cultural tourism

Please explain in the text box below.:

20 What else could be done to improve the management of native vegetation to arrest the decline of native vegetation extent and condition?

Please provide your answer in the text box below.:

Upload a document

21 If you would like to upload a document to support your submission, please upload it here.

Upload document 1 here.:

DWER - Native Vegetation response - PCA - 100220 .docx was uploaded

Please describe which question(s) document 1 relates to. :

This document is Property Council WA's response to Native Vegetation in Western Australia issues paper for public consultation November 2019 and relates mostly to the questions about Better Information and Better Regulation.

Upload document 2 here.:

No file was uploaded

Please describe which question(s) document 2 relates to. :

WA's Native Vegetation
Response to discussion paper on WA's Native Vegetation
Department of Water and Environmental Regulation
8 Davidson Terrace
JOONDALUP WA 6027
Locked Bag 10
JOONDALUP DC WA 6919

VIA EMAIL
nvs@dwer.wa.gov.au

Dear Native Vegetation Team

Re Property Council WA Response to **Native Vegetation in Western Australia** Issues paper for public consultation November 2019

We welcome the opportunity to respond to the State Government's discussion paper on Native Vegetation in Western Australia focused on developing a State native vegetation policy, better information, better regulation and a bio-regional approach.

Property Council of Australia champions the industry that employs 1.4 million Australians and shapes the future of our communities and cities. Property Council members invest in, design, build and manage places that matter to Australians: our homes, retirement villages, shopping centres, office buildings, industrial areas, education, research and health precincts, tourism and hospitality venues and more.

On behalf of our members, we provide research and thought leadership to help decision-makers create vibrant communities, great cities and strong economies. We support smarter planning, better infrastructure, sustainability and globally competitive investment and tax settings to underpin the contribution our members make to the economic prosperity and social wellbeing of Australians.

General comments

We recognise the importance of the South East of Western Australia as a global biodiversity hot spot and we support attempts to improve the quality of information about native vegetation across the State.

We support a native vegetation policy that promotes consistency and transparency and applies to all native vegetation, clearing and rehabilitation across the State.

Broadly, we believe there is scope to improve data quality about native vegetation, fauna and clearing and to ensure this information is freely available to industry, government agencies and members of the community.

Accurate information and universal access

It is crucial that we have an up-to-date database of native vegetation and an accurate analysis of its condition, including areas that have been rehabilitated or re-seeded. Better quality data is a powerful tool for good decision-making. This information must have integrity, contain contemporary, timely information and be available to everyone. A high-quality, comprehensive database will enable decision makers to optimise economic, environmental and community outcomes.

Delays and financial costs of environmental surveys

We do not believe landholders should be required to undertake multiple environmental surveys and checks for agencies at local, State and Commonwealth levels. It is imperative there is clarity about the information sought so that the right information can be collected for timely use by any of the agencies or government authorities. Requiring multiple surveys increases development costs, which are ultimately passed on to building owners, including homebuyers, reducing affordability. If multiple surveys are to be undertaken, there should be some form of offset, either in terms of fast-tracking applications, or financially to acknowledge the extra impost.

We support the development of a bioregional framework and support aligning these with First Nations regions.

Reducing duplication and streamlining approvals

We note this issues paper doesn't mention the State-Federal Green Growth Plan, designed to protect environmental values in the Perth and Peel region, simplify environmental approvals and encourage a more compact urban footprint. The purpose of the Green Growth Plan initiative is to ensure that a project clears a universal set of environmental hurdles that can be applied by local, State and Commonwealth governments, reducing red and green tape, streamlining approvals processes and reducing costs. We believe initiatives to protect WA's Native Vegetation should be linked to the Green Growth Plan to reduce duplication and create a streamlined, consistent approach.

Desirable outcomes from a property industry perspective

From a Property Council WA perspective, it is important that our members have access to accurate, contemporary information about native vegetation and its status and that the planning system and the environmental protection system work together smoothly, to ensure timely decision making and certainty for our members.

Our members need a clear understanding of whether an area can be developed (or not) and a straightforward, timely pathway to gaining approvals. The cost of holding land for long periods, long delays in approvals, or requiring multiple levels of environmental approval and surveys becomes prohibitive and ultimately adds to the cost of housing for those who can afford it least.

One of our developer members shared an example that illustrates the messy, inefficient interaction between planning and environmental arms of government when it comes to the Wandi High School site.

In this case, the Department of Education required the developer to set aside land for a high school site but did not want to acquire the site because the school is not required until after 2031.

However, the significant holding and opportunity costs imposed on the developer included land tax of around \$215,000 a year.

After representations to the Premier, Treasurer and Minister for Education, the Department of Education asked the WA Planning Commission to initiate a Metropolitan Region Scheme amendment to rezone the site from Urban to High School reservation in the MRS to enable acquisition by the WAPC under Part 11 PD Act;

Department of Planning, Lands and Heritage consulted Department of Water and Environmental Regulation, which required a vegetation survey despite the fact the land is currently zoned Urban in the MRS, Development zone in the City of Kwinana TPS2 and is shown for high school purposes in the Wandi South LSP which included a full environmental report and was approved by the WAPC in 2012 and again in 2018 (amended version).

This example highlights:

- Unwarranted delays by Government agencies in acquiring sites required for public purposes in accordance with established policy;
- Government agencies (in this case DWER) not giving appropriate regard to endorsed plans and the planning system. As well, there appears to be complete disregard for the cost and inconvenience to the developer and future residents.
- Increasing uncertainty, delays and lack of confidence our members are experiencing with the planning system.

Conclusion

We support a State native vegetation policy, taking a bio-regional approach, informed by high quality, contemporary information including First Nations knowledge, that supports a logical, timely, cost-efficient pathway to development.

Property Council WA supports outcomes that lead to clarity and certainty for our industry and the community.

We believe that by improving the quality of information about native vegetation, clearing and rehabilitated areas, we can have better informed decisions about land use. This information should be collected in a central database that is freely available to industry, academic, research, not-for-profit groups and individual members of the community. We support moves to invest in better information including mapping and monitoring and strongly support the development of a robust framework for consistency in the quality and accuracy of information collected.

We are concerned that lack of universal access to native vegetation, clearing and rehabilitation information is contributing to confusion and a requirement for multiple, costly environmental surveys. This excessive duplication of regulation is creating needless expense and causing delays that impose onerous unnecessary costs on developers, which are passed on to West Australian homebuyers.

On behalf of Property Council WA and our members, I wish to thank you for the opportunity to comment on Department of Water and Environmental Regulation's Native Vegetation in Western

Australia issues paper. We believe that our input is important for finding a better way to get the best outcomes for our environment, our community and our economy.

Yours sincerely,



Sandra Brewer
WA Executive Director
Property Council of Australia