

City of Joondalup's Submission on the Draft Native Vegetation Policy for WA

General Comments

The City of Joondalup appreciates the opportunity to provide comment on the Department of Water and Environmental Regulation *Draft Native Vegetation Policy for Western Australia* (Policy). The City is supportive of the Draft Policy and the whole of State Government approach to the management of native vegetation in Western Australia to improve consistency and strategic coordination across relevant State Government functions. The City acknowledges that local government is a key stakeholder in the management of native vegetation. The City is supportive of comments included within the Western Australia Local Government Association's (WALGA) submission on the draft Policy as outlined in this submission.

The City of Joondalup is committed to conserving, enhancing and rehabilitating the City's natural assets to ensure the long term protection of the environment for future generations. The City manages approximately 500 hectares of natural areas in coastal, bushland and wetland areas. There are a number of regionally, nationally and internationally significant natural areas located within or adjacent to the City including the Yellagonga Regional Park, Marmion Marine Park, Neerabup National Park and a number of Bush Forever sites which contain species of high conservation value. The City budgeted approximately \$3 million for conservation and natural area management in 2021-22, which equates to 2.75% of the City's budget for the year. There are limited funding opportunities available for the purpose of natural area management and some of the City's lower priority natural areas have minimal resources allocated. The City suggests that increased funding be allocated for local governments to implement natural area management and conserve and enhance existing natural areas. Improving the vegetation condition and extent of local natural areas will contribute to the objectives of the draft Policy.

The City strongly supports the Policy's aim to drive better strategic outcomes for native vegetation using tools already available through improved collaboration and coordination across State Government functions. It is suggested that consideration is given to also acquiring new tools as required to improve the management of native vegetation in WA.

The Policy states that targets and thresholds are best tailored to specific parts of WA, underpinned by better data and locally focussed stakeholder engagement. It is suggested that the large amount of work undertaken by WALGA and local governments through the Local Biodiversity Program (formerly called the Perth Biodiversity Project), which established targets for retention of native vegetation complexes along the Swan Coastal Plain, be used as a reference when setting targets. The City would welcome consultation regarding the establishment of targets and thresholds for the retention and revegetation of native vegetation.

The City supports the recommendation in WALGA's submission that the structure and format of the Policy be revised to reduce its complexity, use consistent terminology, include clear objectives and make it easier to see the links between the actions and the higher order elements of the Policy.

Policy Objectives

The City supports the recommendation in WALGA's submission that the Policy should include as a primary objective to increase the nett extent, condition and connectivity of native vegetation in WA, consistent with the COAG national approach. This should be operationalised through the goals and approaches for each of the four strategies as in the Policy's current form it is not clear how a nett increase in vegetation extent will be achieved.

The City supports the purpose of the Policy, however it is suggested that objectives are included such as to:

- Prevent the decline of threatened flora and fauna species
- Protect areas of high conservation value
- Achieve a nett gain in native vegetation extent, condition and connectivity.

The City also supports the recommendation in WALGA's submission that the broad objective of nett gain should not place unreasonable constraints, costs and delays for activities that have social and economic benefits and involve clearing of native vegetation.

Policy Statement

The City strongly supports the application of the mitigation hierarchy to manage clearing of native vegetation through the steps of avoid, minimise, rehabilitate and lastly to consider offsets.

Greater consideration could be given to the recognition of revegetation and rehabilitation of local natural areas. Local government is responsible for the management of a large number of natural areas and due to finite resources and available budget, priority for management is given to areas in best ecological condition. There is an opportunity to utilise lower priority areas as offset sites to improve vegetation condition and contribute towards the policy objectives of nett gain of native vegetation extent.

The City also supports improvements to the spatial capture of regulatory, land management, land planning and funding decisions that affect native vegetation and the application of common data standards to facilitate data sharing.

The City would welcome the opportunity to work with DWER to improve the mapping and monitoring of native vegetation extent, condition and type and would encourage this spatial data to be freely available.

The City supports the recommendation in WALGA's submission that it is supportive of a regional approach to the management of vegetation provided it includes a strategic approach to approvals to clear native vegetation in support of key infrastructure or other proposals and that supporting offsetting achieves optimal conservation outcomes.

Guiding Principles

The City supports the values, practice, opportunities and challenges outlined as the Guiding Principles and suggests consideration of the following:

- Value 2 - inclusion of a reference to WA's native fauna also being of national and global significance and its reliance on native vegetation as habitat.
- Practice 7 – provision of more details regarding the implications of a comprehensive, adequate and representative reserve system for the conservation of native vegetation.
- Practice – inclusion of a statement regarding continual improvement through monitoring and evaluation of the policy.
- Opportunities and challenges 15 – inclusion of connectivity in regards to a nett improvement in the condition and extent of native vegetation.

Strategies and Outcomes

The City supports the Policy's strategies and outcomes. In regard to the outcome that 'native vegetation objectives are achieved, together with other state priorities', it is unclear which objectives are being referenced.

In regard to Figure 2, further clarity could be provided regarding how Strategy 4 relates to Strategy 1, 2 and 3.

Goals and Approaches

The City supports the goals and approaches outlined, however it is unclear how the goals and approaches relate to the priorities and opportunities outlined in the roadmap and if they will be evaluated and implemented.

The City suggests consideration of the following:

- Strategy 1 – Approach vi: The City would welcome the opportunity to provide input into the identification of lands with strategic value to inform investment in restoration and conservation and suggests that enhancement of ecological linkages be considered.
- Strategy 1 – Approach viii: adding plant pathogens to the examples of threats to native vegetation.
- Strategy 2 – Approach iii: The City would welcome the opportunity to provide input into regionally tailored objectives across State Government regulatory pathways.
- Strategy 2 – Approach iv: further details could be provided regarding the meaning of complementary mechanisms in regard to regulation of native vegetation and biodiversity objectives.
- Strategy 2 – Approach v: native vegetation data sharing could also include historical spatial data to provide context in regard to the decline of native vegetation extent.
- Strategy 4 – Approach v: The City highlights the need to ensure that appropriate funding and resources are provided to ensure existing areas of native vegetation are adequately managed as well as consideration of additional resources required to enable a nett gain in native vegetation extent, condition and connectivity.

Roadmap

The City supports the recommendation in WALGA's submission that the role of the Steering Committee of Directors General of State Government agencies should include measuring and reporting on the effectiveness of the Policy as well as progress on actions, including achievement of the State-wide native vegetation objective and regional targets. The City also supports WALGA's recommendation that the Steering Committee should ensure that it has meaningful and adequate consultation with key stakeholders including local governments.

It is recognised that 'achievement of the roadmap actions will be monitored through a steering committee of Directors General, with annual public reporting on progress'. The City suggests further details are included in the Policy regarding the steering committee of Directors General such as:

- Roles and responsibilities
- Reporting on progress of roadmap actions
- Reporting on achievement of native vegetation objectives and targets
- Monitoring and reporting on Policy effectiveness.

The stage 1, 2 and 3 actions have timelines to commence within 1-3 years, 4-6 years and 6-10 years. It is suggested that completion dates are also included for each opportunity and priority project. Consideration could be given to separating the policy into a high level policy and an action plan with more details provided regarding opportunities or priority projects, completion dates, resources and budget required.

Opportunities and Priorities

Reference	Opportunity or Priority Project	City Comment
<i>Strategy 1 – Planning, collaboration and coordination</i>		
1.1	<p>Prioritise areas or matters for strategic collaborations or planning. Identify policy-making pathway(s), spatial boundaries, lead agency, participants and implementation pathways.</p> <p>Partner agencies are listed as DBCA, EPA, DPLH, DMIRS, DPIRD, DPC</p>	<p>The City supports the recommendation in WALGA's submission that it supports the need for strategic collaborations between key Government agencies, and that local government is a key stakeholder in developing a framework for strategic collaboration and planning to protect native vegetation at a local level and should be included in these collaborations where appropriate.</p> <p>Suggest inclusion of Department of Local Government, Sport and Cultural Industries (DLGSC) as a partner agency and the formalisation of WALGA and Local Government Areas directly or indirectly affected by the Policy as key stakeholders for consultation.</p>
1.2	<p>Develop outputs, including regionally tailored objectives and priorities, in line with outcomes 1 and 2, and their goals and approaches.</p> <p>Local governments are listed as a partner agency.</p>	<p>The City supports the recommendation in WALGA's submission that the local government sector should be meaningfully engaged in the development of the regionally tailored objectives, priorities and actions.</p> <p>Consideration could be given to providing more details regarding the responsibilities and resources required by local government to implement this opportunity.</p>
1.3	<p>Implement regionally tailored objectives and priorities through relevant State Government functions, updating documents, processes and systems as appropriate.</p>	<p>Suggest clarity is provided in regard to whether local government are being included as partner agency and the responsibilities and resources required by local government to implement this opportunity.</p>

Reference	Opportunity or Priority Project	City Comment
	Partner agencies are listed as 'optional for boards and commissions, local government'	
1.4	<p>Establish monitoring and evaluation against regionally tailored objectives and priorities, leveraging native vegetation extent, condition and type data, and biodiversity audit data supported by Strategy 3 actions.</p> <p>This opportunity is listed as stage 3 (due to commence in 6-10 years).</p>	Suggest that this opportunity is listed as a stage 1 action (commence in 1-3 years) to align with 1.2 and 1.3 which refer to developing and implementing regionally tailored objectives and priorities.
1.5	<p>Evaluate the efficacy of existing State Government mechanisms for native vegetation protection and strategic planning. Collaborate with agencies to progress the recommendations.</p> <p>Partner agencies are detailed as 'other agencies, as relevant'.</p>	<p>The City previously provided a detailed submission and support for the <i>Draft Perth and Peel Green Growth Plan for 3.5 Million</i>. The City's submission included a substantial amount of natural areas proposed as conservation commitments.</p> <p>The City would welcome the opportunity to provide input into an evaluation of the efficacy of existing State Government mechanisms for native vegetation protection and strategic planning.</p>
1.6	Address ongoing loss of native vegetation in the Wheatbelt through whole-of-government approaches.	Consideration could be given to including a similar priority project to address the loss of native vegetation in the Swan Coastal Plain through whole-of-government approaches.
Strategy 2 – Contemporary systems and practice		
2.1	<p>a) Progressively improve the transparency of decisions affecting native vegetation, publishing where appropriate.</p> <p>b) Transparently assess regulated proposals against relevant regionally tailored objectives and priorities.</p>	The City supports a strategic and comprehensive review of the clearing permit process, particularly in regard to exemptions. Improvements could be made in regard to regulation and compliance and consistency and transparency of clearing permit decisions, including for exemptions.

Reference	Opportunity or Priority Project	City Comment
2.2	<p>Progressively capture decisions that affect native vegetation condition or extent in spatial format, to aligned data standards, supporting data sharing.</p> <p>Identify key pathways for spatial capture of actual (reported) clearing or burning, to support Action 3.1.</p>	<p>Consideration could be given to also including native vegetation restoration areas as part of the spatial data capture.</p> <p>The City currently engages a contractor to capture and analyse high resolution multi-spectral imagery every two years to assess vegetation condition and canopy cover in 14 major conservation areas.</p> <p>It is recommended that spatial data be captured annually and distributed for no cost through Data WA to local governments to enable ongoing monitoring and reporting of native vegetation extent, condition and connectivity. The City would welcome the opportunity to provide input into the specifications of a spatial data system to capture native vegetation extent, condition and connectivity.</p>
2.4	<p>Digital systems:</p> <ul style="list-style-type: none"> a) Progress the Environment Online digital portal and assessment system for environmental and water regulation, including links to BIO (Action 3.3b), as appropriate). b) Progress digital systems for capture, interpretation and sharing of biodiversity data, through BIO. c) Engage across state and local government to progress towards a single, publicly accessible digital system for native vegetation data capture, sharing and use. Leverage Environment Online and BIO, and integrate products from Actions 3.1, 3.2 and 3.3, as appropriate. 	<p>The City supports the recommendation in WALGA's submission that local government should have on-going involvement in the development of the single digital platform, including scoping of the system specifications and piloting of prototypes, to ensure the products are in formats accessible to local government, recognising the varied capacity of local government to utilise this data.</p> <p>The City supports the consolidation of water and environmental regulatory processes into one online platform to improve efficiency, transparency and consistency of environmental approvals.</p>

Reference	Opportunity or Priority Project	City Comment
		The City would welcome the opportunity to engage regarding the progression towards a single, publicly accessible digital system for native vegetation data capture, sharing and use.
2.5	Improve operational systems, policy and processes for clearing permits (Part V Division 2, <i>Environmental Protection Act 1986</i>) for efficiency and clarity.	The City supports improvements to the clearing permit system, policy and processes to improve efficiency and clarity, particularly regarding exemptions, monitoring, reporting and compliance, and would welcome the opportunity to provide input.
Strategy 3 – Build, share and use knowledge to improve		
3.1	Native vegetation extent: Leverage satellite imagery and machine learning to develop a semi-automated, regularly updated, statewide terrestrial native vegetation extent product. An improved extent product would: <ul style="list-style-type: none"> a) track clearing over time b) improve statistics on proportion of vegetation type remaining c) enhance compliance and enforcement capacity. 	The City supports the development of a semi-automated, regularly updated, statewide terrestrial native vegetation extent product using satellite imagery and would welcome the opportunity to provide input into the specifications.
3.2	Native vegetation condition: <ul style="list-style-type: none"> a) Develop a product derived from satellite imagery to monitor vegetation condition on pastoral leases. b) Build on learnings from pastoral condition spatial product (3.2a) to develop a statewide native vegetation condition product to enable tracking of changes over time. 	<p>The City currently engages a consultant to acquire and analyse high resolution multi-spectral imagery every two years for considerable cost to enable reporting against natural area key performance indicators of vegetation condition and canopy cover in 14 major conservation areas.</p> <p>The City supports the development of a satellite imagery product to monitor statewide native vegetation condition, with this product being available for use by local government. The City would welcome the opportunity to</p>

Reference	Opportunity or Priority Project	City Comment
		provide input into the specifications.
3.3	<p>Biodiversity datasets and native vegetation type mapping:</p> <ul style="list-style-type: none"> a) Expand capture of native vegetation data within the Index of Biodiversity Surveys for Assessment (IBSA). b) Progress scientific and system capability to generate updated native vegetation type mapping, leveraging pooled biological survey datasets (e.g. BIO – Action 2.4c). 	The City supports the development of native vegetation type mapping using biological survey datasets. Consideration could be given to commencing the generation of updated native vegetation type mapping within 1-3 years rather than 6-10 years as this data is imperative to use as a baseline for native vegetation type monitoring.
3.4	<p>Improve native vegetation mapping in the Wheatbelt, prioritising mapping to support strategy development (see Action 1.6).</p>	<p>Consideration could also be given to prioritising native vegetation mapping in the Swan Coastal Plain as a large amount of native vegetation clearing has occurred and the remaining native vegetation is of high conservation significance with the large majority of vegetation remaining in local natural areas being indicative or confirmed Banksia Woodland and/or Tuart Woodland Threatened Ecological Communities.</p>
Strategy 4 – All sectors enabled		
4.1	<p>Progress and improve how incentives and pricing are used to support good stewardship of native vegetation, including avoidance and minimisation of clearing:</p> <ul style="list-style-type: none"> a) Explore opportunities for new pricing and valuation methods to incentivise stewardship, including environmental offsets. b) Support and promote agricultural, pastoral and forestry land uses that fix carbon, support biodiversity, promote soil health and other ecosystem services. 	<p>Consideration could be given to the development of a native vegetation valuation calculator tool to demonstrate the economic value of native vegetation taking into account factors such as carbon sequestration, tourism and public health benefits.</p>
4.2	<p>Environmental offsets:</p> <ul style="list-style-type: none"> a) Improve the environmental offsets framework in line with 	<p>The City supports the recommendation in WALGA's submission that it supports a</p>

Reference	Opportunity or Priority Project	City Comment
	<p>recommendations of the WA environmental offsets framework review.</p> <p>b) Undertake a broad strategic evaluation of environmental offsets to enable flexibility and clarity; encourage rehabilitation and revegetation; and ensure offsets contribute to strategic regional priorities.</p>	<p>broad strategic evaluation of environmental offsets. This should be informed by the WA Environmental Offsets Framework Review, which should be made publicly available. Local government should be consulted as part of the evaluation and consideration of changes to the Framework.</p> <p>The City supports improvements to the environmental offsets framework and a broad strategic evaluation of environmental offsets and would welcome the opportunity to provide input. The environmental offsets framework should contribute to the nett gain in native vegetation extent, condition and connectivity and also reflect that environmental offsets are the last resort, in accordance with the native vegetation mitigation hierarchy.</p>
4.3	<p>Enhance the effectiveness of fuel-mitigation programs across the state to reduce the risk of bushfire to the community and the environment.</p> <p>Local governments are listed as a partner agency.</p>	<p>As fire mitigation is a key management responsibility for local government clarification is sought on how fuel-mitigation programs would be enhanced under the proposed Policy.</p>
4.4	<p>Plan for Aboriginal engagement in parks and bushfire management through existing and future initiatives.</p>	<p>There are opportunities to develop partnerships between land managers (including local government) and Aboriginal people to enhance management of local natural areas. Further details could be provided regarding existing and future initiatives for Aboriginal engagement in parks and bushfire management.</p>
4.7	<p>Build on existing strategies to protect and enhance urban forests.</p>	<p>The City supports the recommendation in WALGA's submission that it supports further work to build on strategies to protect and enhance urban</p>

Reference	Opportunity or Priority Project	City Comment
		<p>forest. It is recommended that the State Government develop a comprehensive, urban greening program and that grant funding be provided to local governments to support and accelerate the implementation of urban forest plans.</p> <p>The City has successfully implemented a Leafy City Program since 2017 to increase canopy cover in residential streets and reduce the heat-island effect.</p> <p>The City would welcome the opportunity to provide input into the update of strategies to protect and enhance urban forests. Clarity could be provided regarding the existing strategies and the focus of the intended work.</p> <p>Consideration could be given to allocating grant funding to urban forest programs for planned as well as additional tree plantings. Only additional tree planting programs were eligible for the Local Government Urban Canopy Grant Program administered by WALGA and funded by the Water Corporation in 2021-22.</p>

Other Comments

Legislative Context

The City acknowledges that the Policy is not legislated under Part III of the *Environmental Protection Act 1986*. Clarity could be provided regarding the relationship between this Policy and existing policy instruments such as the *State Planning Policy 2.8 – Bushland policy for the Perth Metropolitan Region*.

Community Education and Engagement

Consideration could be given to including an opportunity or priority project regarding community education and engagement in native management. Community education programs could be implemented to raise awareness of native vegetation values, encourage

active participation in conservation and further knowledge development through citizen science and education. This could also be included as an Opportunity in the Guiding Principles section. The City implements an Environmental Education Program to enhance community participation in environmental initiatives and encourage community appreciation and ownership of the natural environment.