

Native Vegetation Policy for WA: Draft for consultation

Prepared by the Urban Bushland Council WA Inc to assist Members and Supporters with their submissions

Find the online survey here: <https://consult.dwer.wa.gov.au/native-vegetation/draft-policy/>

Completing your submission

We expect the survey will take you a minimum of 20 minutes to provide basic responses, or 60 minutes if you include detailed text responses.

Please note that:

- You can save and come back to your submission.
- You will need to answer all the questions tagged as 'required' in the 'Your details' section.

Page	Response
Sue Conlan	0 percent complete 0 of 5 questions answered
Context	0 percent complete 0 of 1 questions answered
Guiding Principles	0 percent complete 0 of 1 questions answered
Strategies and outcomes	0 percent complete 0 of 1 questions answered
Goals and Approaches	0 percent complete 0 of 1 questions answered
Roadmap	0 percent complete 0 of 1 questions answered
Upload a document	0 percent complete 0 of 1 questions answered

YOUR DETAILS

1. What is your name?

Name (Required)

Sue Conlan

2. What is your email address?

Your email address is required for identification purposes and will not be published or provided to a third party. If you would like to receive updates on the native vegetation policy, please indicate below.

Email (Required)

mail@mosmanparkbushland.org

☒ I would like to receive updates

3. Can we publish your response? (Required)

☒ Yes, you may publish my response

☐ Yes, you may publish my response anonymously

☐ No, you may not publish my response

4. Do your views officially represent those of an organisation? (Required)

☐ No, these are my personal views

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

If yes, please specify the name of your organisation.

Friends of Mosman Park Bushland

5. Which of the following represents your, or your organisation's, primary interest in native vegetation? (Required)

☐ Aboriginal ☒ Conservation ☐ Development ☐ Environmental management

☐ Farming/Agriculture ☐ Forestry ☐ Local Government ☐ Mining ☐ Pastoral ☐ State

Government ☐ Other

If you have chosen 'other', please specify

CONTEXT

The policy aims to drive better strategic outcomes for native vegetation using the tools already available, through improved collaboration and coordination across State Government functions. It proposes measured, step-wise and enduring reforms. The reforms drive improvements to information and build the foundation for enabling participation among stakeholders that will underpin future reforms.

It assumes that targets and thresholds are best tailored to specific parts of the state, underpinned by better data and locally focused stakeholder engagement.

6. Has the Policy's context adequately covered native vegetation values, opportunities and challenges? (Select all that apply)

- ☐ The context section is broadly satisfactory
- ☒ There are elements to be addressed (use text box below)

Please provide details on missing elements in the text box below

Values:

SouthWest WA as a Biodiversity hotspot, unique regional geoheritage (landscapes, flora and fauna) are not adequately described as being under imminent threat.

Opportunities:

For a whole of government review into the planning process failures.

Challenges:

- 1) to stop using **offsets** for clearing of native vegetation
- 2) to fund this project and recommendations from this.
- 3) urgency of need
- 4) Bring back the balance

GUIDING PRINCIPLES

The draft guiding principles aim to acknowledge the importance of native vegetation, the established management approaches and the status of native vegetation in WA. They underpin the development of the policy and its implementation approach.

7. How suitable are the guiding principles in providing a contemporary foundation for managing native vegetation? (Select all that apply)

- ☒ The guiding principles are broadly suitable
- ☒ There are elements to be addressed (use text box below)

Please provide details on missing elements in the text box below.

While the guiding principles stated are all necessary,

1) Climate change is absent and needs to be the most important guiding principle for all government policies

Native Vegetation (NV) will be most affected by climate change but it's restoration, protection and management will be our most effective way to mitigate climate change along with a transition from fossil fuels.

NVP and restoration needs the highest priority in planning policies to give certainty to forecasted climate impacts to:

- economy ,
- Aboriginal culture,
- water quality and supply,
- agriculture,
- health and well being,
- tourism,
- coastal erosion
- and to give direction to infrastructure strategies.

2) ~~The value of NV balance of NV versus development has passed~~has for too long been overshadowed by the push for development. Restoring the balance should be a guiding principle.

3) SouthWest WA as a Biodiversity hotspot, preserving the unique regional geoheritage (landscapes, flora and fauna) ~~needs~~to be a guiding principles.

STRATEGIES AND OUTCOMES

The outcomes of the policy will be achieved through the four strategies that provide for policy evaluation and improvement, supporting a contemporary policy cycle.

8. How well do you support the strategies and outcomes?

	Strongly support	Support	Neither	Opposed	Strongly opposed
Strategies: The four strategies working together to enable policy evaluation and improvement	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Outcome 1: Native vegetation is conserved and restored at landscape scale	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Outcome 2: Certainty, transparency and data sharing improve	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Outcome 3: Improved policy, practice and evaluation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Outcome 4: Native vegetation outcomes are achieved, together with other State priorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

How would you refine or improve the strategies and outcomes?

Please provide details on improving outcomes below.

Outcome 1: add a **net gain**.

Outcome 4: The balance needs to be restored. Native vegetation destruction can no longer be the cheap short term option for state priorities. **Alternatives** must be planned. NVP strategies needs to be communicated to all government and public so alternate approaches are planned. ~~These alternatives will be more expensive, need to be provisioned in business plans and assessed for economic viability.~~

Our citizens are demanding ecological sustainability so there is intergenerational equity of health and living standards in a growing -population. Delay in action will be catastrophic.

GOALS AND APPROACHES

Arranged under four strategies, the goals and approaches will guide delivery of the outcomes, through applying to relevant actions in the roadmap. The goals provide for evaluation of this policy and its implementation.

9. How suitable are the goals and approaches in guiding implementation of the policy?

	Suitable	Somewhat suitable	Neither	Somewhat unsuitable	Unsuitable
Strategy 1 goals and approaches	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strategy 2 goals and approaches	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strategy 3 goals and approaches	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strategy 4 goals and approaches	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

How would you refine or improve the goals and approaches?

Please respond under the relevant Strategy text box below.

Strategy 1 goals and approaches

a) Evaluation of where the State planning process is failing NV protection across all agencies, WAPC, LGA's, DAA, DBCA, EPA, DWER, DLGSC, DPLH

Business Plans for developments:

Whole of government includes DLGSC (local government department) where business plan description must include cost of social and environmental losses. Business Plans are currently contrived to convince authorities to allow development approvals. Ocean Reef Marina Business Plan prepared by City of Joondalup is a prime example of selective data use. Critical revenue entries had not aligned with information given to the councillors on the finance committee.

DAA (Aboriginal Affairs) need to improve processes for protecting areas of Aboriginal heritage and significance. Registered sites should be regarded as warning signs for areas of significance. Developers see them as places to build up to. All waterways are significant to protect for Aboriginal cultural values and environmental values. Native Vegetation is inextricably linked to Aboriginal Culture. Diminishing Native Vegetation is diminishing Aboriginal culture.

Currently Aboriginal Heritage reports are not required and when supplied cannot be verified by DAA or Southwest Aboriginal Land and Sea Council because no entity has this information or there is lack of information. This requires collaboration of universities, public and private studies. Current and historical flora and fauna report of bush tucker and medicines should be mandatory in a heritage report. This is outside the scope of archaeologists.

1.6 a) Roadside verges if cleared for any reason need to be extended 10-fold into adjoining land ~~if cleared to~~ to make up for the loss and time it will take for the entity that required the clearing to restore bushland of the same value and function. Since restoration is difficult, consider completely realigning the wider road to clear land and restoring the smaller remnant road with NV.

The same must apply to government agencies who often hold quite a percentage of remaining NV in a shire. Infrastructure works are carried out with no accountability on clearing and rehabilitation is non-existent unless conservation groups request it. eg land in Mosman Park along the Stirling highway is under management by Watercorp. This area although mainly weed recruitment from past clearing has ~~been~~ re-established with local natives, ~~4-several~~ of them lost ~~to~~ elsewhere in Mosman Park and the Western Suburbs. Although they are not on the threatened list, they are locally rare with genetics that must not be lost from WA. We discovered on a community walk ~~that~~ clearing of the last remaining Callitris ~~preiseii-Preiseii~~ and a patch ~~in-of natives in~~ good condition ~~of natives~~ had been overcleared for maintenance of ~~nearby~~ infrastructure ~~nearby~~. From a complaint being made by our group, Watercorp did work with us on a species list to replant. However very few plants survived and without the help of the community volunteering to weed out the recruiting Victorian ~~Tee-Tea~~ tree ~~the area~~, this area ~~would-is~~ be ~~doomed-destined~~ to lose function.

Unless agency infrastructure work is made accountable to NV and a dollar value placed then NV will always lose out.

Strategy 2 goals and approaches

Elements need addressing, see roadmap actions below

Strategy 3 goals and approaches

Data Sharing:

- a) The community have no confidence that there is up to date information on how much native vegetation remains, it's ecosystem function value and condition therefore, who's management it is under. Until that information is confidently available the precautionary principle for clearing native vegetation must prevail.

b) Data centralised and available at different levels of authority which will allow a general location of rare plants. This should be a warning sign of an area under threat. A large area must be left for recovery of the species because of the same soil type and conditions can not be met elsewhere therefore clearing cannot be offset. Eg Town of Mosman Park staff decided the highest spot in Mosman Park should be revitalised but not with local native species but a cafe. Much time and money was spent on consultants and building design. However, the site unbeknown to them was where a small patch of an extremely rare plant that was as rare as hens teeth is found. Much time and money could be saved if there was a centralised map that could have rung alarm bells to anyone looking for native vegetation areas needing revitalising with cafes and urban developments. I am not sure if the status of this plant would have been enough in the end to protect it. However, the cost of this revitalisation was too expensive for the town to pursue.

Mapping:

A map of state ecological linkages should be given priority.

Building on the state planning maps in the Capital Cities Planning Framework 2013(CCPFW) to improve the intent of the Perth to Peel @3.5million strategy. This state map would need to show where the green linkages where they are needed so that LGA's can aim for better connectivity which may have to occur through better streetscapes, wildlife overpasses where they have already been breached. This includes minimising passive recreation. It would be preferable that bushland nodes, erosion and water quality control are fenced. Incentives could be given to LGA's to do this. This will servicing our COAG commitment 2012 **Goal 1** Increase the national extent and connectivity of native vegetation

Currently there are very few areas along the Swan Canning River that are prohibited from use. Areas where waterbirds nest and forage should be increased. There are many conservation volunteers who need this mandate from you, WA Government. This is a necessary step for our national RAMSAR agreement.

Strategy 4 goals and approaches

Elements need addressing
See roadmap actions below.

ROADMAP

To achieve the intended outcomes, this policy identifies a roadmap of priorities and opportunities to be implemented primarily through State Government actions. These actions comprise a coordinated, whole-of-government approach.

10. Which roadmap actions are most important?

You may answer as few or as many as are relevant.

	High priority	Medium priority	Low priority
Regionally tailored objectives and priorities (Actions 1.1 - 1.3)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitor and evaluate policy implementation (Action 1.4)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review of existing mechanisms for protecting native vegetation (Action 1.5)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
A focus on the Wheatbelt (Action 1.6 and 3.4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transparency of decision-making (Actions 2.1 - 2.3)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Systems to support decision-making and data sharing (Action 2.4)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improve efficiency and clarity of the clearing permit process (Action 2.5)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Native vegetation mapping and monitoring (Actions 3.1 to 3.3)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Incentives and pricing for good stewardship (Action 4.1)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environmental offsets (Actions 4.1a) & 4.2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (use textbox)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If your response is in relation to a particular action(s), please include the action number(s).

Please provide your answer in the text box below.

Action 2.1-2.3

Development applications and approvals need to be well documented and readily accessible for public scrutiny in a timely fashion

Action 2.1

Lack of public and local awareness of clearing proposed until on ground action occurs.

- Proposals for MRS amendments need more accountability and made available to the public. LGA's need a check box when accepting MRS amendments that they have advised stakeholders especially those volunteers who look after the bushland that a MRS amendment is proposed for a development that will impact the bushland they care for along with the regular requirements of notifications to surrounding properties. Even when developments are not in bushland but interfere with recovery plans for species such as removing street trees that are required to strengthen ecological linkages. See Capital Cities Planning strategy 2013 for map of the Perth ecological linkages that need strengthening through streetscapes.
- There is a fault with public notifications on DWER website when clearing permit requests are submitted. The public only have a choice of either receive all notices of clearing permit requests or none. This gives a public perception that contesting clearing permit requests is made as secretly as possible. The public need to be able to select smaller ranges of LGA or shires.

Not only does this require fixing but notification of NV clearing permit requests must be given to stakeholders, especially to community groups that volunteer to protect and enhance local NV areas. It is already in the State Planning guidelines for coastal development but is not a requirement of the development process.

This anomaly needs remedying by:

- upon notification to the LGA that they need to inform the stakeholders which would be surrounding businesses, residents and community groups who volunteer for the bushland in that suburb or surrounding suburbs. Since it is a ~~state~~ State strategy to connect bushland through green corridors then those looking after bushland along green corridors need to be notified.
- LGA's although they say they notify surrounding residents there is no requirement to keep a record.
- ~~This~~ This could be a simple relatively inexpensive fix allowing for fairer community engagement.
- An assessment of a development in bushland needs to take into consideration ~~consider~~ the loss ~~for~~ of landscape, biodiversity, cultural, recreational, social and historic aspects versus the development benefits.

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Action 2.5 The clearing permit process is not fit for purpose. Efficiency can be gained by true transparency to the public, and an end to selective reporting by proponents. The community expectation is that our remaining NV is critically important and should remain.

- Clearing permits should never be given without a business plan. The process needs reform so that a business plan must include the social and environmental cost.
- 100year coastal erosion and inundation predictions are out of the scope of the clearing principles and will result in further clearing which is misrepresented by the development
- Urban Forest values are out of the scope of the clearing principles. Canopy cover and suitability of canopy cover for an urban forest must be evaluated before a clearing permit is approved.
- How deeply the clearing extends is outside the scope of the clearing principles. Deep excavation has a much greater impact to surrounding vegetation and needs to be considered before a clearing permit is issued.
- Clearing outside the development footprint because of the necessity to reroute roads and paths is outside the scope of the clearing principles. Not disclosing this in a development proposal appears corrupt to convince authorities and the public to accept the development.
- Clearing must stop if evidence of Aboriginal significance is found by the public including tools.
- If clearing causes a break in an ecological link, it must be restored with a wildlife pass fit for purpose that is fully costed into the business plan. More studies are needed on suitable sizes of underpasses and overpasses which have been failing to date.
- An assessment of a development in bushland needs to consider the loss ~~for~~ of landscape, biodiversity, cultural, recreational, social and historic aspects—versus the development benefits. If this is done early, non-selectively, ~~clearly~~ transparently it would streamline the development process so that the proponent is given some certainty of a development proposal.

Action 2.4

- All of government and the public need access to a central website that indicates what the purpose of the land is that they are interested in. NV must be the foundation infrastructure and regarded as priority green infrastructure, Strategy 1, a) and b)
- A map of ecological linkages should be given priority. Building on the state planning maps in the Capital Cities Planning Framework 2013(CCPFW) to improve the intent of the Perth to Peel @3.5million strategy to conserve NV. This map needs to show where the green linkages are or needed so that LGA's can aim for better connectivity which may have to occur through better streetscape, wildlife overpasses. This will service WA's COAG commitment 2012 Goal 1 Increase the national extent and connectivity of native vegetation
- Historic plans for areas eg Vlamingh Parklands Final Report needs to be layered on a map as a foremost regional ecological linkage with nodes of undisturbed bushland to strengthen

ecological values not to be breached with urban developments and limit on recreational disturbance.

Action 3.1 -3.3 NV mapping

Action 4: Environmental Offsets have failed. They do not replace the native vegetation lost in any way therefore are not like for like. Offsetting with critically endangered vegetation which should on it's own right be protected is corrupt.

An offset for 20 ha of protective Bush Forever coastal vegetation on a \$250m development can not be offset with a \$1.6m purchase of critically endangered Tuart/Banksia woodland 20kms away.

I do not believe this NV policy will achieve:

- a net gain in native vegetation extent
- Protection of NV now and for future generations
- Preventions of further extinctions of species.
- Protection of areas of high conservation value
- lay the foundations for enduring reforms
- Hon. Minister Amber-Jade Sanderson's FOREWARD intent
- The Premier's Biodiversity plan for the state when he was Minister for the Environment in 2006.
- **The goals of the COAG 2012 Australia's Native Vegetation Framework which WA is a signatory**

Goal 1 - Increase the national extent and connectivity of native vegetation

Goal 2 - Maintain and improve the condition and function of native vegetation

Goal 3 - Maximise the native vegetation benefits of ecosystem service markets

Goal 4 - Build capacity to understand, value and manage native vegetation

Goal 5 - Advance the engagement and inclusion of Indigenous peoples in management of native vegetation

If State strategies and policies are non-binding, have no statutory affect then development applications and approvals need to be well documented and readily accessible for public scrutiny in a timely fashion.

I urge the State Government to identify strategies with more ambition to protect and manage existing native vegetation and furthermore deliver a net gain in native vegetation.

I fully support the Urban Bushland Council NV submission and the Wilderness Society NV submission.

UPLOAD A DOCUMENT

11. You can upload documents or supporting information here.

Attached files will be published, where consent has been provided under Question 3. Please ensure any file is virus-free, redacted and ready for publishing.

File upload 1 Please make sure your file is under 25MB

Choose file

Current file: No file chosen

Please describe the documents you have uploaded, and if relevant which question they relate to.

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