

Microsoft Exchange Server;converted from html;

From: [REDACTED]

Sent on: Monday, October 25, 2021 2:04:52 AM

To: Native Vegetation Strategy <nvs@dwer.wa.gov.au>

CC: [REDACTED]

Subject: O268894 - FW: Comments on Consultation Draft Native Vegetation Policy

FILE NO: ENV/13

OFFICER: [REDACTED]

22 October 2021

Native Vegetation Strategy Branch

Department of Water and Environmental Regulation

Locked Bag 10

Joondalup DC

WA 6919

Via email: [HYPERLINK "mailto:nvs@dwer.wa.gov.au" nvs@dwer.wa.gov.au](mailto:nvs@dwer.wa.gov.au)

Dear Native Vegetation Strategy Branch

Shire of Augusta Margaret River comments on the Consultation Draft Native Vegetation Policy for Western Australia, August 2021

Thank you for opportunity to review the Consultation draft Native Vegetation Policy for WA. The Shire of Augusta Margaret River has reviewed the consultation draft, and provides the following comments for your consideration in preparing the final policy.

Context

The Shire of Augusta Margaret River is located in the South West Botanical Province, and lies within the Southern Jarrah Forest and Warren IBRA Regions. The Shire's municipal area covers 237,000 ha, of which over 60% is native vegetation cover (35% of this is contained in state forest, and 7.9% in reserves). The Shire itself manages approximately 2,188 ha of natural areas in Shire-vested reserves. The Shire of Augusta Margaret River is committed to the protection of native vegetation and biodiversity on both public and private lands, recognising the importance of being located in the South West International Biodiversity Hotspot, and the Cape to Cape National Biodiversity Hotspot. This is broadly achieved through land use planning incentives, community and Aboriginal partnerships, and natural area management programs. The Shire also adopts best practice strategies in understanding, avoiding and mitigating impacts to native vegetation in implementing its own capital works program. This involves undertaking biological surveys, altering project designs to avoid impacts, and mitigating impacts through on-site management.

The Shire is supportive of the development of a Native Vegetation Policy for Western Australia as a tool for providing strategic direction to improve the protection and enhancement of native vegetation in WA. The comments provided below come from the Shire's perspective as a regulatory authority, natural area manager, and as a provider of community infrastructure projects (e.g. safe roads).

Comments

General

While the Consultation Draft is comprehensive, the framework and terminology used is difficult to follow. For example, use of terms such as strategies, outcomes, goals, approaches, priorities, actions and opportunities creates unnecessary complexity and confusion. The goals and approaches do not seem to clearly link to the opportunities and actions. It would be useful if the framework and terms used in the final document were simplified and clearly defined to improve clarity and practical application of the policy.

1.2 Regionally tailored objectives and priorities

The Shire supports the development of regionally tailored objectives and priorities in protecting native vegetation and sharing of data. However, clarification is needed on how regions will be determined. The boundaries provided in Figure 1 are not clear, and it is uncertain whether there will be flexibility or variation in developing objectives and targets within regions. For example, it is not certain whether the Capes Region will be considered as part of the Swan Coastal Plain, Intensive Land Use Zone, or the Wheatbelt. As mentioned above, the Shire of Augusta Margaret River contains over 60% native vegetation cover, which varies considerably to some other local government areas in these regions where native vegetation cover is extremely low. In cases where clearing roadside vegetation may be required for road projects, the significance of roadside vegetation may be considered less in a local government area that has higher remnant vegetation cover than one that has very low cover, and where roadsides comprise a majority of the area's remnant vegetation. Issues such as these should be considered in the implementation of regulatory processes (e.g. native vegetation clearing permits). Local Government Authorities should be involved in setting regional objectives and priorities referenced in the draft Policy in collaboration with stakeholders, and the Shire of Augusta Margaret River welcomes opportunity for this involvement.

2.4 Digital systems

The proposal to "Engage across State and Local government to progress towards a single publicly accessible digital system for native vegetation data capture, sharing and use" (Action c) is strongly supported by the Shire. It should be ensured that local governments are involved in developing a single digital platform for native vegetation data across sectors.

2.5 Improve operational systems, policy and processes for clearing permits

The Shire strongly supports Action 2.5 "Improve operational systems, policy and processes for clearing permits (Part V Division 2, *Environmental Protection Act 1986*) for efficiency and clarity". The need for streamlined approvals processes that align with funding timelines for delivering strategic infrastructure projects is required, to ensure that administrative processes do not unnecessarily delay or constrain the construction of regionally important projects. Projects involving minor or insignificant clearing in particular (e.g. dangerous trees) need to be considered.

The current process for granting a clearing permit, regardless of the level of clearing or impacts, or purpose of the clearing, is long, onerous, and often detrimental to the delivery timeline for projects. While the Shire fully supports the protection of native vegetation in delivering infrastructure projects such as road upgrades, our experience to date is that timelines are too long, often with repeat requests for additional information. Even when a best practice approach has already been made in clearing permit applications to demonstrate a good understanding of and avoidance and mitigation of impacts, the long approval process often results in a delay in starting projects. This is not ideal when delivering a strategic infrastructure project such as a road upgrade that provides an important service to the community (i.e. safe roads).

One way of improving the clearing permit process would be to incorporate a better understanding of vegetation condition into the assessment of applications, particularly in the Intensive Land Use and Wheatbelt Zones. This will assist the Department in assessing the impacts of clearing proposals at a more strategic scale, and therefore improve and streamline processes. For example, the removal of a narrow corridor of disturbed roadside vegetation for a road upgrade, that is adjacent to a large, intact area of native vegetation (e.g. National Park or State Forest), should not warrant the same level of assessment of impacts as a clearing proposal involving the removal of good quality vegetation in an less disturbed environment; or roadside vegetation that represents the only remnant native vegetation at the local or regional scale. Improving capture and knowledge of vegetation condition at a landscape and bioregion scale for clearing permits would assist with streamlining this process. This knowledge and data management should be managed by the State.

While the intent of Action 2.5 is supported, there is need for Government to demonstrate that adequate resources will be made available to effectively improve the efficiency of the current clearing permit process.

4.2 Environmental Offsets

The Shire supports a broad strategic evaluation of environmental offsets. Support should be provided to local governments that may be required to implement large offset projects as a result of a community infrastructure or public works project (provided that the focus is primarily on avoidance and mitigation of impacts before considering offsets).

Native vegetation on private land

One of the goals in the Consultation Draft is “State Government policy settings inspire and enable conservation and restoration, across public and private sectors” (Strategy 4, Goal a). However, the Priority Projects in the body of the document include little information on the Government’s approach to improving the protection of native vegetation on private property. Reference is made to “incentives and pricing” (Action 4.1), however this seems to relate more to how offsets will be leveraged rather than encouraging environmental stewardship and landcare practices by landowners. Environmental education is also a clear component that is missing from the draft policy. Further detail and direction on improving the protection of native vegetation on private land is required.

Threatening processes

The document makes reference to “Improve the condition of native vegetation by identifying and addressing threats and threatening processes” (Strategy 1, Approach viii). There is no further consideration of how threatening processes such as pests and disease, and the role they play in protecting native vegetation, will be addressed. It would be useful if direction was provided on issues like weeds, feral animals and disease, and their impacts on native vegetation, will be addressed under the policy across all land tenures (private and public).

Should you wish to discuss any of the above comments, please contact [REDACTED], Senior Environment Landcare Officer on [REDACTED] [REDACTED].

Yours sincerely



The Shire of Augusta Margaret River acknowledges that we are on Wadandi and Pibelmen Country and pays respects to elders past and present.

Disclaimer: The contents of this email message are confidential and intended only for the named recipient. If the reader of this email is not the intended recipient, you are hereby notified that any use, reproduction, disclosure or distribution of the information contained within is prohibited. If you have received this email message in error, please notify the sender at the Shire of Augusta Margaret River.

[Please consider the environment before printing this email.](#)



[fillColor14286846fillOpacity16384fFilled10100090000032100000000000500000000000400000003010800050000000b0200000000050000000c0202000200030000001e00040000002701ffff030000000000](https://www.facebook.com/AMRShire)