

29 October 2021

Native Vegetation Strategy Branch,
Department of Water and
Environmental Regulation,
Locked Bag 10,
Joondalup DC, WA 6919

By email: nvs@dwer.wa.gov.au

Consultation draft: Native Vegetation Policy for Western Australia

Thank you for the opportunity to provide feedback on the consultation of the draft Native Vegetation Policy for Western Australia. The Urban Development Institute of Australia (UDIA) WA is the peak body representing the property development industry in Western Australia. UDIA is a membership-based organisation with members drawn from the residential, commercial and industrial property development sectors. UDIA members include both private and public sector organisations. Our industry represents approximately 10.1% of Western Australia's Gross State Product, contributing \$27.8 billion annually to the Western Australian economy and \$270.5 billion nationally. As well as helping to create sustainable and liveable communities, the industry employs a total of 205,100 Western Australians and 2.023 million Australians across the country.

Comments

UDIA WA acknowledges the McGowan Government's commitment to improving the management and protection of our native vegetation and fully supports the Policy's aim of 'driving better strategic outcomes through improved collaboration and coordination across State Government'.

UDIA supports the Native Vegetation Policy's purpose, scope and its policy statement, however we are concerned that the Policy does not clearly articulate its statutory status. As such, we are concerned about how the Policy may be interpreted and implemented in practice. To provide all stakeholders including development proponents with greater certainty, its statutory status should be more clearly explained. Similarly, greater clarity regarding the status of the Policy's 'practice' guiding principles should also be provided.

To achieve its aims, the Policy identifies a comprehensive set of 39 actions requiring significant policy and regulatory reform across a wide range of Government agencies. Whilst timeframes are set against these actions, it is unclear if resources have been allocated to enable these actions to be delivered. It is also unclear how progress of the actions will be monitored, reported and how lead agencies will be held accountable for achieving these actions in a timely manner.

We are encouraged that the Policy repeatedly recognises the need for greater strategic environmental planning and also that it identifies *"a net improvement in the condition and extent of native vegetation can be achieved through strategic coordination"* as an opportunity within the Swan Coastal Plain and Wheatbelt. However, despite recognising this need, very few strategic level actions are identified amongst the Roadmap's actions. UDIA recommends that the Roadmap's *Strategy 1 Planning, Collaboration and Coordination Actions* are strengthened to include the establishment of strategic environmental assessment and approval framework for the Perth and Peel region. The development industry is challenged by separate but often duplicated Commonwealth, State and local government

approval process requirements. To resolve these challenges and to deliver improved environmental, economic, and social outcomes for WA, Government must ensure that environmental approval processes are fully aligned, clear and consistent. Achieving this alignment would also provide greater certainty for all stakeholders involved. A strategic environmental assessment and approval framework under the EPBC Act is the best “first step” towards achieving this alignment.

UDIA strongly supports Action 4.2 of the Policy’s Roadmap and encourages the Department to seek improvements to the environmental offsets framework as a priority action. Improving the offsets framework is vital to maximising environmental outcomes and improving transparency whilst also providing industry with the certainty to guide investment decisions.

Recommendations:

- The Policy clearly sets out its statutory status;
- The Roadmap’s *Strategy 1 Planning, Collaboration and Coordination Actions* are strengthened to include the establishment of a strategic environmental assessment and approval framework for the Perth and Peel region; and
- Action 4.2 and adopting improvements to the environmental offsets framework are undertaken as an urgent priority.

Should the Department require any assistance or further information regarding these comments,

