

13 April 2005

Towards a Biodiversity Conservation Strategy for WA
Department of Conservation and Land Management
Locked Bag 104
Bentley Delivery Centre
BENTLEY WA 6983

To Whom It May Concern:

DISCUSSION PAPER: TOWARDS A BIODIVERSITY CONSERVATION STRATEGY FOR WESTERN AUSTRALIA

The Urban Development Institute of Australia (UDIA) is the peak body representing the property development industry in Western Australia.

The development industry is a key contributor to conservation and sustainable development in Western Australia and maintains a vital interest in contributing to the development of conservation policy by the State Government. It is in this capacity we offer our submission on the *Towards Biodiversity Conservation Strategy for Western Australia Discussion Paper*.

The primary issue considered in this submission is the implementation of measures for biodiversity protection by local and state government agencies. This submission is general in its approach in providing comment on the discussion paper, due to the general nature of the discussion paper itself.

The industry wishes to have further opportunity to comment once more detailed information about the strategy is available.

UDIA BACKGROUND

UDIA members are increasingly adopting principles of sustainable development and biodiversity conservation as part of their corporate philosophy and practices and recognise increased community aspirations in this regard.

However, UDIA members have a number of concerns regarding the impact that new policies for conservation and biodiversity protection have on the environmental approvals process and on the cost of land development – particularly in regard to costs that

reserving land for conservation purposes can have on landowners where proper compensation is not available.

In particular, ongoing consultation with our members reaffirms that issues and problems often arise for the urban development industry in regards to biodiversity protection as a result of:

- Inconsistent and overlapping requirements between regulatory authorities;
- Increasingly complex requirements for obtaining environmental approvals; and
- Inconsistent interpretation of environmental issues across local authorities.

UDIA believes that the proposed Biodiversity Conservation Strategy provides an opportunity to alleviate some of these problems.

It is the hope of the industry that the proposed strategy, when prepared, will clarify both industry and government responsibilities in regards to biodiversity protection. Industry strongly requests that the policy does not add additional layers to an already overly complex environmental regulatory system.

UDIA IN PRINCIPLE SUPPORT

In principle the Urban Development Institute of Australia supports the State Government's development of a Biodiversity Conservation Strategy.

The need for an up to date, clear strategy on how the state will address the numerous threats to Western Australia's unique and rich biodiversity is necessary from the perspective of the development industry.

In particular, UDIA believes that the preparation of a biodiversity strategy provides a unique opportunity for the large scale protection of biodiversity in Western Australia (especially in regional areas which are currently under-represented in the national reserve system, such as the Avon Wheatbelt Region).

This would assist in addressing the current imbalanced distribution between regional and metropolitan reserve areas.

STRATEGIES NEEDED TO PROMOTE BIODIVERSITY CONSERVATION AND ADDRESS ITS DECLINE AT A STATE LEVEL

Key Strategic Direction Number Five: Integrate biodiversity conservation considerations into Government processes, and institutional reforms for biodiversity conservation; with better coordination.

This direction discusses the need for better planning for and management of biodiversity. One of the 25 year output targets being that all local government authorities have developed biodiversity plans.

This aspect of the strategy is likely to be the key issue of concern to UDIA members. There are almost 150 different local authorities in Western Australia each with different policies for environmental and biodiversity protection. UDIA would support the development of clear guidance from the state government on the role and responsibility of local government in biodiversity protection to ensure consistency across authorities and to avoid an imbalanced focus on local, micro issues which detract from the focus and resources available to achieve large scale biodiversity protection at a state level.

To achieve this, we believe that the biodiversity strategy, when developed, should identify clear guidelines for the implementation of policies and directives at local government level and seek to achieve a co-ordinated approach to biodiversity conservation across local authority areas.

Key Strategic Direction Number Six: Establish a protected area network for biodiversity.

UDIA suggests that to promote biodiversity conservation, the Government needs to recognise the importance of ensuring that there is a more evenly distributed reserve system across the state.

As previously outlined, we believe that there is currently a disproportionate focus on conservation in the metropolitan area in comparison to regional areas. While approximately 13% of the metropolitan area is currently earmarked for reserves, as little as 1.62% of some of the state's most biodiverse and environmentally degraded regions, such as the Avon Wheatbelt, are currently reserved for conservation.

There is recognised scientific evidence which indicates that small, disturbed reserves in metropolitan areas have limited viability for conservation due to factors including, size, fragmentation, disturbance, pollution stress and the need for active management. In comparison, large reserves in regional areas are very effective for conservation.

UDIA believes that the preparation of a biodiversity strategy provides an opportunity for identification and focus on large scale conservation activities in regional areas which can provide significant outcomes for the state as a whole.

CONCLUSION AND RECOMMENDATIONS

In conclusion, UDIA generally supports the introduction of a Conservation of Biodiversity Strategy for Western Australia.

However, we request that the Department of Conservation and Land Management prepare a strategy which provides clear, overarching direction for biodiversity conservation in WA.

In this regards we request that:

- The biodiversity strategy, when prepared, should identify clear levels and areas of responsibility for different Government agencies; especially in respect to Key Strategic Direction Number Five.
- The strategy should provide clear guidance to local governments on their role and decision making authority in relation to biodiversity and ensure the consistent application of the strategy across the state.
- The strategy should ensure that biodiversity protection is focused on achieving large scale, significant outcomes at a state and regional level rather than small scale reservation at a local level.

UDIA requests that the industry is consulted when the strategy is drafted in more detail so that UDIA members have the opportunity to comment more specifically on issues which may arise that affect the industry.

Regards,

Marion Fulker
EXECUTIVE DIRECTOR