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Health Impact Assessment
Department of Health
PO Box 8172
PERTH BUSINESS CENTRE WA 6849

By email: hia@health.wa.gov.au

To whom it may concern

Re: HEALTH IMPACT ASSESSMENT IN WA

The Urban Development Institute of Australia (WA) is pleased to provide the following comments in relation to the request for feedback on the Department of Health's: *Health Impact Assessment in WA Discussion Paper*. UDIA is the body representing the property development industry in Western Australia with a membership drawn from the land development, planning, engineering, urban design and environmental professions. Our members create new communities that reflect the principles of Liveable Neighbourhoods Community Design Codes and designing for healthy communities is inscribed in these codes.

Process

In August UDIA held a briefing session for members on the HIA discussion paper. Following this members were canvassed for their opinion on how HIA would influence urban development in WA. Members were also asked whether they thought HIA would provide any additional benefits to the health of new communities and industry that are not already accounted for in current planning requirements.

Industry Response

While supportive of the principles of HIA, the possibility of requiring approval from the Department of Health as a condition of subdivision is not supported by industry. The consensus is that much of the content of HIA is already addressed by existing government regulation, guidelines and policy related to the development of residential land. There are very real concerns that HIA could cause further delays within an already complex planning and environmental approvals process for urban development.

In our view, the requirement for planning for health outcomes is articulated in a number of policies including Liveable Neighbourhoods, the Residential Design Codes, Environmental Impact Assessment, as well as numerous local government policies. HIA potentially adds another layer to the approvals process. It would require developers to gain approval from a non-planning agency without statutory timelines that would effectively inflate project costs and create

time delays. Even the decision of whether or not HIA should be undertaken on a project is problematic and potentially could add weeks or months to a project timeline.

UDIA has been working with the State government over the last two years to streamline and speed up the approvals process for urban development. The timeliness and clarity of the approvals process ensures the consistent supply of affordable land to market in order to meet increasing consumer demand. This work has included recommendations to minimise the number of government agencies involved in the approvals process and to ensure conditions placed on development approvals are necessary and only require clearance from one authority. This position is supported by the recent report of the Land Release Coordinator (July 2007) who also stipulated the need for simplification of the planning process. HIA would add unnecessary complexity to the planning system that both the government and industry is seeking to simplify.

HIA and Environmental Review

Members feel that the reasons for the introduction of HIA are inadequate and appear to be based on a perceived 'gap' in the environmental review process. The briefing cited examples of inappropriate land uses being positioned too close together. Examples were the fire at the Bellevue site and the proximity of the town of Esperance to the port. The review of the Environmental Protection Act in 1996 preclude these types of eventualities occurring today as incompatible uses are not permitted and are subject to a rigorous environmental review process.

UDIA's position is better outcomes would be achieved by a review of the existing environmental approvals process than from the introduction of new guidelines. Where necessary, legislation could be tightened to address any anomalies that may result in adverse health outcomes within urban developments.

Community Consultation

The discussion paper addresses the role of community consultation in determining objectives for communities. Developers commonly undertake community consultation to get to know their purchasers and to find out what the community's expectations are in regard to community facilities and infrastructure that they would like provided in a new development.

It is almost standard practice for major developers to engage Community Development Officers who provide support in establishing a sense of community and support within new areas. In many cases, industry led activity and competition results in better outcomes for the community as the market is very sensitive to competition and home buyers demand a high level of amenity, public open space, walkable streets, community facilities and access to transport. UDIA believes that HIA is informally on the agenda of community consultation and little purpose is served by imposing a formal requirement for minimum standards of community provision which UDIA members are already exceeding.

Conclusion

UDIA understands and supports the need to ensure that urban development is designed for healthy outcomes. UDIA's position is that healthy outcomes are already mandated for in existing planning and environmental policy. Developers are subject to rigorous environmental and planning assessments and review which take into account health issues and the impact of noise, odour, water quality, pollution and safety amongst others.

Communities demand democratic participation in the development of community facilities and public amenity in new developments. The development industry is fully engaged with the need for community consultation on a range of issues, including health, and a formal requirement for HIA has no additional benefit to what is already being achieved.

UDIA would like to thank you for the opportunity to provide comment on the Health Impact Assessment Discussion Paper. If you have any queries or would like to discuss this submission further, please contact UDIA's Manager of Research and Policy, Judith Harley on 9321 1101.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Debra Goostrey', with a stylized flourish at the end.

Debra Goostrey
Chief Executive Officer