

# POSITION STATEMENT

## WETLANDS



### *Context*

The retention of wetland values, functions and attributes are important to industry. Wetlands are dynamic ecosystems which change over time in response to climate cycles or events such as storms or fires. Given their dynamic nature it is important that up to the minute data is the basis for policy development and decision making.

There is uncertainty in the development industry regarding acceptable wetland buffer widths and acceptable uses within wetland buffers particularly in relation as to how these are assessed. The draft *Planning Bulletin – Wetland Buffer Requirements* was endorsed by the Wetlands Coordinating Committee and delivered to the Department for Environment and Conservation for approval in December 2010 yet the bulletin remains unpublished. A significant amount of work has been undertaken by both government and industry over a lengthy period of time in preparation of the draft planning bulletin and it is imperative that it be finalised promptly.

Industry supports responsible wetland conservation and management and this is best achieved where there is a clear policy framework that provides certainty to the proponent and assessor early in the land use planning process. A clear framework facilitates timely decision making to ensure development timeframes control costs, the outcome of which is improved housing affordability.

The review of the existing wetlands buffer guidelines is consistent with the government's planning reform agenda that has committed to review and rescind superseded policy documents. Publication of the draft bulletin must be expedited promptly to ensure the most relevant, effective and up to date wetland buffer guidelines are available to guide decision making.

### *Dataset on wetland mapping*

Industry is concerned that the dataset used as a basis to guide planning and decision making is inaccurate for detailed site planning purposes. The 1:50 000 scale at which the data are captured does not support detailed site planning. To ensure robustness of wetland mapping onsite assessment should be undertaken before wetland boundaries and classifications are determined. Wetland reclassifications are sought where the management category does not reflect the mapping or needs to be refined to suit detailed site planning. Decision making must be based on the most appropriate available data to provide optimum outcomes for the environment and the community. Where changes to wetland boundaries are being sought consideration must be given to the long term outcomes for the wetlands including potential changes as a result of climate change.

### *Implementation of draft wetland buffer guidelines*

Work on the implementation of the draft wetland buffer guidelines requires immediate attention. The existing planning bulletin, *Guideline for the Determination of Wetland Buffers*, was advertised for review in December 2005 and despite extensive work undertaken by the government and industry in the intervening period the draft updated planning bulletin has not been published. As an industry it is critical that we have clear policy frameworks that facilitate certainty early in the planning process to ensure timely decision making. Delays in clearing conditions have a significant impact on housing affordability and policy must be mindful of the potential for delays to cause cost blowouts resulting in reduced affordability.

Industry has fully supported the preparation of the planning bulletin to guide the application of the buffer guidelines within the land use planning process. Some key issues for industry are:

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- Given the bulletin is a planning policy, wetland buffers should be recognised as just one component of a multitude of factors that are considered in land use planning processes and decisions to achieve balanced and sustainable outcomes;
- As a land use planning document the policy will be most effectively applied during local structure planning, subdivision approval and development approval phases of the planning process;
- The new guideline and policy framework should not create situations where buffer distances would be revisited after planning processes have already considered or made provisions for wetland buffers;
- A 50 metre buffer is an effective separation for urban development in the majority of cases, with 30m buffer being most suitable for Resource Enhancement Wetlands;
- Where there is a particular value that requires a larger buffer, this must be specified in the policy;
- The policy should allow flexibility for significant wetlands or high risk land uses / threats;
- The policy must differentiate between spatial issues (that is, the required buffer) and wetland management issues, which are addressed in a management plan.

A further item of interest to the industry is the need to clarify how wetland buffer requirements are dealt with in terms of Public Open Space calculations. The lack of open space credits, or treating buffers as restricted use open space, devalues wetlands as there is no economic incentive in place for the preservation of wetlands in urban areas. This results in ongoing disagreements with WAPC regarding compensation with affected landowners attempting to reduce the wetland values so as to downgrade the wetland status. The benefits of allowing open space credit for wetlands include: increased water conservation as more POS would be used for passive recreation; economic incentives to preserve and conserve wetlands and their buffers, and reduced costs to the state for acquisition of wetlands as they would be included in POS calculations.

#### *UDIA policy position*

*It is the policy of UDIA to:*

- Advocate for the immediate publication of the draft *Planning Bulletin - Wetland Buffer Requirements* prepared by the Wetland Coordinating Committee (December 2010);
- Advocate for the government to initiate a review of the Wetland Mapping and Classification database to make it current and relevant to today's conditions;
- Advocate for wetland buffers to be included in Public Open Space calculations.

This Position Statement articulates UDIA's current policy position and supersedes any other UDIA policy statement.

<b>Committee Review</b>	<b>Endorsed by Council</b>	<b>Policy Review</b>
	July 2011	