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10 February 2020

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

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

Dear Sir/Madam

Native Vegetation in Western Australia Issues Paper

Thank you for the opportunity to provide feedback on the Native Vegetation in Western Australia Issues Paper. The Urban Development Institute of Australia (UDIA) WA is the peak body representing the development industry in Western Australia. UDIA is a membership 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.

UDIA is currently preparing its Policy Priorities for 2020, which focuses UDIA's advocacy on three key issues: the economy, the environment and liveability. Given these priorities, we fully support the release of the Native Vegetation Issues Paper and the Government's intent to 'strike the right balance between protecting the environment and delivering a strong economic outlook'. In order to achieve this by adopting better regulatory processes, a robust evidence base is essential. Therefore, UDIA supports increased investment in better mapping and monitoring information.

UDIA supports the adoption of a bioregional approach and ensuring that rules and thresholds appropriate to each bioregion are adopted. We also support the intent to introduce flexibility in terms of how objectives are met. Preliminary work undertaken by UDIA's Environment committee, has shown that the assessment of impacts on vegetation using an arbitrary percentage impact on vegetation complexes might not be the best way to undertake assessments.

Within the Swan Coastal Plain, there are many vegetation complexes with large amounts of vegetation remaining that would not be significantly impacted by localised clearing when assessed at a regional level. Accordingly, the assessment of vegetation at a regional level using some flexibility based on actual impact is supported by UDIA. Once complete, the Institute would welcome the opportunity to discuss the work undertaken by the Environment Committee with the Department and the Environmental Protection Authority.

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Should the Department require any assistance or further information regarding this submission, the UDIA would be delighted to assist, please contact Chris Green, Director Policy and Research at cgreen@udiawa.com.au or 9215 3400.

Yours sincerely

Tanya Steinbeck

Chief Executive Officer