

Mr David Caddy
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Dear Mr Caddy

**ENVIRONMENTAL PROTECTION AUTHORITY SUBMISSION ON STATE
PLANNING POLICY 2.9 AND PLANNING FOR WATER GUIDELINES**

Thank you for the opportunity for the Environmental Protection Authority (EPA) to comment on the State Planning Policy 2.9 (policy) and Planning for Water Guidelines (guidelines).

Background

The EPA appreciates the comprehensive review of the water-related planning policy framework and the significant consultation undertaken with environment agencies such as the Departments of Water and Environmental Regulation and Biodiversity, Conservation and Attractions. Continued collaboration with these agencies will help to underpin a comprehensive policy and guideline that will assist decision-makers to achieve optimal water resource outcomes and environmental protection.

The EPA has a longstanding interest in the protection of Western Australia's wetlands, estuaries, waterways and groundwater systems, and notes that these are under increasing pressure associated with land-use change and a drying climate in the south-west of Western Australia (WA). These valuable water resources should be provided with adequate buffers and measures to protect, manage and conserve water quality and quantity, native vegetation, habitat and associated biodiversity and cultural values. The EPA also notes that robust measures are needed to protect people from potential changes to water regimes, including impacts such as nuisance insects, insect borne diseases, flooding and the degradation of drinking water source areas. The suite of measures proposed in the policy and guidelines will enable effective water resource management and environmental protection.

Strengthening WAPC role in water resource protection

The EPA maintains a robust policy suite to support delivery of its advice, including environmental impact assessments (EIA) of significant proposals, strategic proposals, and planning schemes and strategic advice under the *Environmental Protection Act 1986* (EP Act). The EPA welcomes the reference to its factors and objectives in the draft guidelines, and in particular the EPA's objective to protect inland waters '*to maintain hydrological regimes and quality of groundwater and surface water so that environmental values are protected*'. It is also important to note that other EPA environmental factors are directly related to matters associated with water resource planning. On this basis, there may be merit in making explicit reference to several other environmental factor guidelines and technical guidances that intersect with water resources, notably subterranean fauna, social surroundings, flora and vegetation and terrestrial fauna.

The EPA is particularly pleased to see cumulative impacts addressed in the guidelines. This is consistent with the amendments to the *Environmental Protection Act 1986* that were passed in November 2020, which requires proposals be considered in terms of the cumulative effects of their impacts. In addition, a key action from the EPA's Strategic Plan 2019-2022 is to champion improvements to the assessment and management of the cumulative effect of impacts. Taking a strategic approach to addressing cumulative environmental impacts is a priority for the EPA and be a central consideration in future assessments.

Conclusion

In summary, the EPA is supportive of the policy and guideline to deliver transparency and consistency of decision-making for water resources in WA. It is also likely that the policy and guideline will enhance environmental protection and encourages the WAPC to continue to engage closely with the EPA on these matters.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Matt Tonts', with a stylized flourish at the end.

Professor Matthew Tonts
CHAIR

15 November 2021