

Submitted on Tuesday, November 13, 2018 - 08:04

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DETAILS  
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Company: Shire of Donnybrook-Balingup  
First name: Works & Services  
Last name: Manager  
Address: [REDACTED]  
Suburb: [REDACTED]  
State: [REDACTED]  
Postcode: [REDACTED]  
Phone: [REDACTED]  
Email: [REDACTED]  
Sector: Local Government

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NATIVE VEGETATION CLEARING  
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\*1 . Would a strategic approach to clearing, through a strategic purpose permit, benefit you?\*

Response: yes

Comments:

The Shire currently has a strategic purpose permit for roads and infrastructure <1ha. This permit is advantageous as long as the Shire has qualified staff to -

- 1) apply for permit
- 2) assess each area prior to clearing
- 3) monitor and record clearing
- 4) management and maintenance

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\*2. Is the 'purpose component' reasonable to apply considering the added complexity of assessing this type of clearing permit?\*

Response: unsure

Comments:

Environmental surveys such as flora, fauna, dieback etc are required for any clearing project. If this is not assessed by DWER then LG's or consultants will be required to conduct the works.

\*3. Is the proposed fee structure fair and does it adequately reflect differences in the financial capacity of clearing permit applicants?\*

Response: no

Comments:

Commercial operations may be able to afford fees on the size of the clearing however, there should be a process for exemptions or a way to apply for reduced fees.

The Department has outlined no levels of service that they will guarantee with the increased fees. Also, the process needs to be more considerate of the needs of the applicant. If someone wants to appeal a decision, should they not be required to pay for this as well?

\*4. What is the likely impact on your business or industry of the proposed clearing fee structure?\*

Comments:

The change in fees will have a huge impact on Local Government, mainly because LG's will be paying fees on clearing with ratepayers money for the upgrade of ratepayers roads. Applications for clearing permits by LG's are generally for either road widening (for improved safety) or to extract raw materials (gravel) for road upgrades.

LG's should be able to pay minimal fees or be exempt from requiring clearing permits, as it is just shifting cost between Government Departments.

\*5. Additional comments regarding Native Vegetation Clearing not addressed in the questions above.\*

Comments:

To save time and money (for both DWER and the applicant) eliminate the requirement for a permit, if the area to be cleared is less than 1ha of native vegetation/year/area. For example due to limited funding, LG's will only clear what is required to get the project completed and is generally under 1ha ie a 1m wide strip alongside a road.

Projects would still need to be referred to the Commonwealth Government under the Environment Protection and Biodiversity Act 1999 (EPBC Act) if more than 1ha of habitat where threatened fauna and flora are located.

Questions

- Has there actually been any reduction in clearing since the introduction of the permit system in 2004?
- Historically, does issuing of permits reduce, increase or have no effect on clearing of native vegetation?
- Have any (and how many) applications for clearing have been rejected by DWER in the past 5 years?

Suggestions

- Abolish the requirement for a clearing permit if area is >1ah in area
- The process of appeals/objections to clearing permits need significant consideration. If someones wishes to appeal they should have to pay a significant fee, that is only refunded if the appeal is successful.

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WATER  
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\*6. Do you consider it reasonable for taxpayers to pay 100 per cent of the cost of assessing water licence and permit applications and if so, why?\*

Response: no

Comments:

No, however a recording/permit system should be in place so DWER know where and how much water is being taken, on a yearly basis.

\*7. If water licence and permit assessment fees were introduced, what do you consider to be an appropriate fee for a water licence or permit application?\*

Comments:

\$50-\$200 per application, then risk based structure for amount of water required.

\*8. Would you consider a risk-based model for determining water licence and permit application fees to be appropriate? If not, what basis could the department use to structure fees?\*

Response: yes

Comments:

Low risk should be capped at \$1,000.

LG's should be able to pay minimal fees or be exempt from permits, as it is just shifting cost between government departments.

\*9. What would be the likely impact on your business or industry if water licence and permit fees were introduced?\*

Comments:

For works in rivers (any registered site, or clearing) fees/permits/licences are already costing thousands of dollars with heritage, dieback, flora and fauna surveys and monitors on site, etc so the introduction of another fee would put more pressure on the budget and less work would be carried out within Shires.

Generally, if fees and charges are too high there may be a reduction in applications and more illegal taking of water.

\*10. If water licence and permit assessment fees were introduced, how could the collection of fees be timed to better support your business or industry?

For example, would you benefit from paying fees up front, at the end of a licence assessment or annualised over the term of the licence?\*

Response: annual

Comments

If required, annually over the extent of the licence.

\*11 . Additional comments regarding Water licences and permits not addressed in the questions above.\*

Comments:

- Have any B&B application been rejected?
- Are B&B licences necessary if most rivers/creeks/tributaries are registered sites and require approval from the DAA ?