



Australian Institute of
Landscape Architects

11 November 2021

**AUSTRALIAN INSTITUTE OF LANDSCAPE ARCHITECTS (AILA) SUBMISSION STATE PLANNING
POLICY 2.9 WATER RESOURCES**

To Whom it May Concern,

The Australian Institute of Landscape Architects (AILA) would like to thank you and your teams for the invitation to comment on the State Planning Policy 2.9 Water Resources

The Australian Institute of Landscape Architects (AILA) leads a dynamic and respected profession: creating great places to support healthy communities and a sustainable planet. AILA is the peak national body for landscape architecture. AILA champions quality design for public open spaces, stronger communities, and greater environmental stewardship.

We provide our members with training, recognition, and a community of practice to share knowledge, ideas, and action. With our members, we anticipate and develop a leading position on issues of concern in landscape architecture. Alongside government and allied professions, we work to improve the design, planning and management of the natural and built environment.

In operation since 1966, AILA represents over 2,500 members Australia wide and promotes excellence in planning and designing for life outdoors. Committed to designing better places, Australian landscape architects have the skills and expertise to improve the nation's liveability through integrated nature-based solutions delivering better environmental, social, and economic outcomes for all Australians.

We create conditions for nature to function and thrive, ensuring that infrastructure puts back as much as it takes from Australia's ancient landscape. We bring together other disciplines, in an integrated way to generate better outcomes.

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Introduction

1. What is your name? Australian Institute of Landscape Architects

Shea Hatch – WA President

2. Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

(Required)

Yes

No

3. What is your email address? wa@aila.org.au

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

4. What region are you from?

(Required)

Gascoyne

Goldfields - Esperance

Great Southern

Kimberley

Midwest

Peel

Perth metropolitan

Pilbara

South West

Wheatbelt

5. What is your interest in the SPP? Please select all that apply.

(Required)

Local government

State government department

Landowner

Industry

Developer

6. Are you responding on behalf of an organisation?

(Required)



X Yes

No

Organisation –

Australian Institute of Landscape Architects (AILA)

Feedback about draft SPP 2.9 - Planning for Water

7. Do you support the objectives of SPP 2.9? (Section 5, page 5)

X Support

Conditionally support

Object

No position

Provide your feedback about the policy objectives.

8. Do you support the outcomes of SPP 2.9? (Section 6, page 5)

Support

X Conditionally support

Object

No position

Provide your feedback about the policy objectives.

Page 2-3, Section 6

Strengthen the Policy to incorporate the need to include Traditional Owner knowledge and understanding of water resources and water resource management in future water resource management.

The Policy Outcomes do not seem to address the already over-utilisation of groundwater resources. How will existing private groundwater consumption be managed sustainably (e.g. residential in competition with POS watering)?

Strengthen the Policy to include the management of private groundwater bores.

Page 2, Section 6.1

Objectives to include "Public Open Space"

Add the following or similar - "That the planning, design and development identifies adequate fit for purpose and economically feasible water resources as a requirement of the capability of the urban land and rezoning to be developed. This is to be undertaken to ensure local communities have access to functional areas of public open space."

9. Do you support the measures identified in General measures? (Section 7.1, page 5)

Support



X Conditionally support

Object

No position

Provide your feedback about the measures.

Page 3, Section 7.1

It is not clearly understood why development applications would be exempt from considering cumulative impacts on water resources.

Reword to state that "Planning decisions (including development applications) should consider cumulative impacts on water resources."

10. Do you support the measures identified in Environmental, social and cultural values? (Section 7.2, page 6)

Support

X Conditionally support

Object

No position

Provide your feedback about the measures.

Page 4, Section 7.2

There seems to be a focus on protecting deep-rooted vegetation, however shallow-rooted vegetation also has ecosystem and water quality treatment values. Furthermore the use of non-endemic species immediately adjacent to waterways can have many detrimental impacts to water quality and ecosystem health so the use of endemic vegetation should be both encouraged and supported by the policy.

Remove reference to "deep-rooted" species and instead retain "endemic species"

Cultural – Traditional Owner knowledge and understanding of water resource management should be incorporated into water management processes. There should be a commitment to furthering how this information can be collected and applied to water resource management, in collaboration with and preferably lead by Traditional Owners. Cultural understanding should extend beyond protecting heritage places and values.

Provide a commitment to furthering how Traditional Owner knowledge and understanding of water management processes can be collected and applied to water resource management, in collaboration with and preferably lead by Traditional Owners. Cultural understanding should extend beyond protecting heritage places and values.

11. Do you support the measures identified in Riverine flooding? (Section 7.3, page 6)

X Support

Conditionally support



Object

No position

Provide your feedback about the measures.

12. Do you support the measures identified in Infrastructure and Supply? (Section 7.4, page 6)

Support

Conditionally support

Object

No position

Provide your feedback about the measures.

Page 5, Section 7.4

The policy should recognise the importance of wastewater as a potential resource that has the ability to be re-used in various ways for social, environmental and economic benefits. In particular in relation to irrigation water (when appropriately treated) in areas where groundwater availability is either low or absent.

The existing text should change the word "disposal" to "management" in the relevant sections of both the policy and the guidelines to recognise this element as a resource to be utilised. This has particular relevance to the need for adaptation to climate change in low (or non-existent) ground water areas or areas of groundwater contamination.

At-source groundwater infiltration should be included within development requirements, as part of stormwater management systems. This both assist in flood mitigation as well as recharging groundwater resources.

13. Do you support the measures identified in Specific area measures: Public drinking water source areas? (Section 7.5, page 7)

Support

Conditionally support

Object

No position

Provide your feedback about the measures.

14. Do you agree with policy measure 7.5(i) and the requirement for both P3 and P3* to be identified as Special Control Area (or equivalent) in the local planning scheme? (Section 7.5, page 7)

Support

Conditionally support



Object

No position

Provide your feedback about the measures.

15. Do you support the measures identified in Specific area measures: Peel-Harvey Coastal Plain Catchment? (Section 7.6, page 7)

X Support

Conditionally support

Object

No position

Provide your feedback about the measures.

16. Do you support the measures identified in Specific area measures: Swan Canning River system? (Section 7.7, page 7)

X Support

Conditionally support

Object

No position

Provide your feedback about the measures.

17. Do you agree with the definitions included in SPP 2.9? (Section 8, page 10)

X Support

Conditionally support

Object

No position

Provide your feedback about the policy definitions

Feedback about Planning for Water Guidelines

18. Do you support the guiding principles included in the Planning for Water Guidelines? (Section 2, page 8)

Support

X Conditionally support

Object

No position

Provide your feedback about the guiding principles.

Page 4, Section 3



Include on last sentence "such as natural landform, endemic vegetation type and other landscape characteristics that reinforce a unique Western Australian sense of place."

19. Do you support the content on climate change? (Section 2, page 9)

Support

Conditionally support

Object

No position

Provide your feedback about the content.

20. Do you support the content provided on cumulative impacts? (Section 3, page 9)

Support

Conditionally support

Object

No position

Provide your feedback about the content.

21. Do you support the content provided on water management reports, including the hierarchy of documents? (Section 5, page 12-29)

Support

Conditionally support

Object

No position

Provide your feedback about the content.

Page 11, Section 5.3

Where District WMRs propose to hand over water management assets to LGA, or potentially impact LGA assets, then it must be demonstrated that the approval process includes the support of the relevant LGA.

Page 13, Section 5.4

Require a service level agreement between LGA and developers in the Local Water Management Report, to ensure that the LGA has the capacity to appropriately manage and maintain water management infrastructure on handover from the developer (where this has been proposed).

Page 16, Section 5.5

Require a service level agreement between LGA and developers in the Local Water Management Report, to ensure that the LGA has the capacity to appropriately manage and



maintain water management infrastructure on handover from the developer (where this has been proposed).

22. Do you support the content and guidance provided for each type of Water Management Report? (Appendix B, C, D and E, page 80-100)

X Support

Conditionally support

Object

No position

Provide your feedback about the content.

23. Do you support the content provided within Environmental, social and cultural values? (Section 6, page 29-38)

Support

X Conditionally support

Object

No position

Provide your feedback about the content.

Page 24, Section 6.1.1

There is contradictory messaging within this point that goes against some of the policy and guiding principle elements of the guidelines. This is in particular relation to the "exceptions to the minimum width of the foreshore that may be granted". The paragraph containing this statement and its justifications should be removed to maintain consistency across the document.

The following "Point viii. views of the waterway from public places;" should be removed as it could appear to give justification for the ongoing damage and vandalism of native vegetation and trees within foreshore areas that local governments are continually responding to. This statement is again contradictory and goes against the guiding principles, as well as local and state government legislation, regarding native vegetation removal in riparian areas, in particular Swan River Trust DCA policies in the context of the Swan Canning River Park. Its implications across the many foreshore areas within Western Australia, the majority of which are public places should provide further justification for its removal from the document.

Page 25, Section 6.1.2

Include the requirement for a minimum 50m buffer zone for conservation value wetlands, in accordance with Guidance Statement 33 (EPA 2008).

The Policy and Guidelines seem to have a focus on the protection of sensitive water resources, but there are other important environments that should also warrant protection, which are not



adequately covered within the documents, for example TECs and PECs that are surface water dependent.

The impact of dewatering discharge to the conservation estate and/or receiving environments and the impacts that would have on the water balance of those receiving environments such as wetlands and other water dependant environments listed in the point below, should be included within the guidelines.

Page 27, Section 6.2

Expand the requirement for protection to other important water dependent environments such as sumplands, damplands, playas, palusplains, barlkarras, paluslopes, palusmonts and groundwater dependant ecosystems.

Page 31, Section 6.3.4

There seems to be a focus on protecting deep-rooted vegetation, however shallow-rooted vegetation also has ecosystem and water quality treatment values.

Remove reference to "deep-rooted" species and instead retain "endemic species"

See also:

page 55, 10.1 Considerations for proposals and decisions, 2.

Page 57, 10.2 Local Planning Schemes, 3.

Page 31, Section 6.4.1

There appears to be an emphasis on protection of cultural heritage sites, with only small reference to the understanding of broader cultural values related to water resources, and Traditional Owner knowledge and water resource management practices.

Strengthen the acknowledgment of cultural values of water resources above and beyond protection of registered heritage sites, and include collaboration with Traditional Owners to incorporate traditional water resource management processes into modern water management.

24. Do you support the content provided within Riverine flooding? (Section 7, page 40-43)

Support

Conditionally support

Object

No position

Provide your feedback about the content.

25. Do you support the content provided within Infrastructure and supply? (Section 8, page 44-58)

Support

Conditionally support



Object

No position

[Provide your feedback about the content.](#)

Page 37, Section 8.1

Water Demand efficiency strategies listed do not address residential water use. Residential water use makes up a significant proportion of WA's water consumption, of both scheme water and self-extracted groundwater.

Inclusion of residential water consumption, in particular groundwater extraction from residential bores, when considering water management and efficiency strategies.

Include additional point (iv) "Use WSD elements such as rain gardens, biofiltration swales and infiltration tree pits to reduce landscape irrigation water demand while providing green infrastructure with water treatment and at source infiltration characteristics."

Page 39, Point 8.4

At-source stormwater infiltration has not been included in stormwater management options. Stormwater infiltration has dual benefits in that it can mitigate localised flood risk, as well as returning water to the local environment through infiltration to local aquifers, rather than losing the water to distant water systems via piped stormwater systems.

Include at-source stormwater infiltration as an important stormwater management strategy.

Trees interact with the urban hydrologic cycle by intercepting incoming precipitation, removing water from the soil via transpiration, enhancing infiltration, and bolstering the performance of other green infrastructure technologies. While on an individual level the effects may be small, on a catchment wide scale, the effects add up to a significant amelioration and enhancement effect of the above attributes and processes.

Include design and consideration for tree planting and protection of existing trees on development sites within stormwater management considerations. Include and reference the use of Australian Standard "Protection of Trees on Development Sites (AS 4970-2009)".

Page 40, Point 8.5

Multifunctional open spaces are also an option to manage the intersection of ground surface and groundwater, as well as surface water. Open spaces can be designed to provide public open space within drier seasons, and also function as inundated areas during wetter seasons.

Include the consideration of multi-functional open spaces that can provide dual purpose as public open space and water retention functionality through different seasonal cycles.

[26. Do you support the content provided within section 9 Public drinking water source areas? \(Section 9, page 59-64\)](#)

X Support



Conditionally support

Object

No position

Provide your feedback about the content.

27. Do you support the content provided within Peel-Harvey Coastal Plain Catchment? (Section 10, page 65-69)

Support

Conditionally support

Object

No position

Provide your feedback about the content.

28. Do you support the content provided within Swan Canning River System? (Section 11, page 70-71)

Support

Conditionally support

Object

No position

Provide your feedback about the content.

29. Do you support the content provided within Roles and responsibilities? (Section 12, page 72-76)

Support

Conditionally support

Object

No position

Provide your feedback about the content.

30. Do you support Appendix A - Example of an inter-disciplinary team? (Page 77)

Support

Conditionally support

Object

No position

Provide your feedback about the content.

Table A.1



AILA strongly recommends that the discipline of Landscape Architect role be included alongside the Planner / Urban Designer Discipline (as well as being included as a separate discipline later in the table) as the examples of design elements and issues considered by this discipline align strongly with roles often undertaken by Landscape Architects.

Under the "Landscape Architect - Examples of design elements and issues considered by discipline"

The following should be included, noting that there is some overlap with other disciplines, these are essential roles that Landscape Architects undertaken to achieve true collaboration within and across a multi-disciplinary team.

5. Multifunctional POS design

6. Application, use and detailed design of green infrastructure (trees, walls, facades, roofs)

7. Application of landscape and environmental context, themes and coordination across other listed disciplines to achieve these outcomes.

Additional disciplines that should be included within this table should be

Cultural heritage consultants to facilitate knowledge transfer and inclusion of traditional owners perspectives, knowledge, aboriginal heritage protection requirements, artworks and other cultural elements within the design of places and spaces, including interpretive elements and place naming.

Arboriculture consultants - to advise on tree protection, setbacks and development requirements around existing trees within a WMR area.

31. Do you support Appendix F - Site requirements for on-site wastewater systems? (Page 101-104)

X Support

Conditionally support

Object

No position

Provide your feedback about the Appendix.

32. Is draft SPP 2.9 and Guidelines an improvement on the current water planning policy framework, comprising of six SPPs, the Government Sewerage Policy and the Better Urban Water Management?

X Yes

No

Provide any additional comments.



33. Is draft SPP 2.9 and Guidelines more user-friendly? e.g. do you find the policy suite simpler to understand, implement and easy to navigate?

Yes

No

Provide any additional comments.

34. Do you think the Guidelines support the implementation and application of draft SSP 2.9?

Yes

No

Provide any additional comments

35. Does draft SPP 2.9 and Guidelines adequately capture the role of planning in the broader water policy framework?

Yes

No

Provide any additional comments.

36. Is there anything that you would consider as helping or hindering the application of draft SPP 2.9 and Guidelines?

Yes

No

Provide any additional comments.

Additional resources such as workshops, and further practical guidance notes need to be developed and delivered to ensure uptake of the policy and guidelines is well understood. Many of the concepts and practises the policy introduces or requires are being applied by professionals that may have had limited exposure or training within these elements, such as collaborations across disciplines, WSD, climate change, urban design, endemic species etc. Additionally further collaboration with industry bodies and assistance to educate their members on the new policy and guidelines would be welcomed.

37. Are there any additional comments you wish to make on the policy or guidelines?

Provide any additional comments.

The Australian Institute of Landscape Architects represents members practising across all of the regions listed in question 4.

The relationship between well managed water resources and resilience to climate change should be strengthened within the policy and throughout the guidelines. Well managed water systems and water use will be able to manage reduced rainfall, increased heat and more intense



storm events, while maintaining comfortable, liveable urban environments. Linkages between water management and climate change resilience could be strengthened, as this will play a critical role into the liveability of urban environments into the future.

Policy

The policy should more strongly emphasise the role of water in supporting liveable, sustainable, productive and resilient places, as it is focussed on managing the perceived impacts of planning and development on water, and from water on planning and development. It is recommended that another objective is added to the policy that is reflective of the benefits and opportunities created by celebrating the role of water in our landscapes.

For example:

Sustainably manage and integrate stormwater, groundwater, wastewater and water supply into the built form to achieve water and environmental outcomes as well as urban amenity, liveability, and urban cooling.

There is a need, for the policy to explicitly recognise the importance of total water cycle management approaches (or integrated water management) to help shift the focus onto the areas of water management that are most critical for the site. Addition of the paragraphs listed above would adequately address this.

Page 1, Section 3 - Water in Western Australia

Incorporate an emphasis on the importance of water in the management of the environmental values of water. This is also an important factor in the mitigation of urban heat impacts and human health and wellbeing.

Guidelines

Page 3, Section 1.4

Strengthen numbered point ix. to include the principle of **restoration** of social, cultural and environmental values where these have been degraded by previous development, and not just maintaining (often degraded) existing values.

Include an additional reference to WSD measures. "retain native vegetation and natural landform"

Please feel free to contact the undersigned to discuss this and any future advice we can offer in helping to finalise this incredibly important strategy.

Kind regards,



Australian Institute of
Landscape Architects

Shea Hatch

AILA WA President, Registered Landscape Architect

SUBMISSION TEAM

This submission has been prepared by a working group of AILA WA Advocacy members.

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