



Environment
Institute of
Australia and
New Zealand

Submission to the NSW Government's Green Paper on a New Planning System for NSW

Introduction

Following the Environment Institute of Australia and New Zealand's (EIANZ) March 2012 submission to the NSW Planning System Review, the NSW Division of the EIANZ welcomes the opportunity to provide comment on *A New Planning System for NSW – Green Paper*.

The Institute's NSW Division represents the views of close to 500 environmental professionals operating in NSW. We have chosen to comment on what we regard as key aspects of the Green Paper for our membership.

General Comments

In general, the NSW Division wants to flag the need for the objectives of the planning system to be based on the principles of *sustainability*. Sustainable decision-making in the planning context is consistent with the other objectives of the planning reforms, including adding long-term economic development to the State, protecting the natural environment, and as part of infrastructure planning connecting people and places. The concept of sustainability is not new, and it should be applied at state, regional and sub-regional levels of planning.

Reformed planning will require clear guidance regarding the interpretation of the concept of 'sustainability' by drawing on the decades of case law and State and Commonwealth legislation that refer to the principles of ecologically sustainable development. In addition, the definition of sustainability should incorporate the broader understanding of sustainability to include social, cultural and economic sustainability. These principles should be overarching objectives of planning decisions in NSW.

Particular Comments

In addition to these general comments, the Division particularly draws attention to the importance of:

- Defining strategic planning at a State-based level, ensuring that adequate consideration is given to climate change mitigation and adaptation strategies in planning decisions;
- Evidence based decision-making relies on historical data records rather than subjective decision-making; and
- Ensuring the integrity of environmental impact assessment through the independent certification of environmental professionals.

Strategic Planning

We support the emphasis on strategic planning. NSW Planning Policies should include issues that are truly of importance to the future of the State as a whole. These include **natural disaster prevention planning** (e.g. bushfire, flooding, storm surge) and flexible approaches for **adaptation to climate change**. Coastal management, biodiversity conservation, and infrastructure are also good examples of spatial planning aspects that require a State-based focus. Given the need to

limit the number of state-level policies, retail and tourism should be considered at the regional level, rather than as part of state level planning.

Strategic planning needs to be supported by **effective strategic impact assessment**. The Division welcomes transparent and **evidence-based decision-making** as essential to fostering the trust of the community. The importance of evidence-based thinking is that it relies on data records and previous history to guide decisions. This approach is more credible than an issue-based approach that involves relatively subjective decision-making.

The Division believes that proper evidence-based decision-making needs to be supported by a broad range of specialists. For example, there is ample evidence of the benefits of including environmental scientists, engineers, educators, social policy makers and economists collaboratively in decision-making processes. These disciplines compliment the planning professional in contributing to effective strategic planning outcomes.

Reformed planning requires the capacity to apply best available information. Therefore the planning process needs to apply the '**Precautionary Principle**' to some development proposals when the evidence-base or adequate science is not available. This might require revising pertinent planning processes when evidence becomes available at a later time.

Training and Transparency in Decision-making

To support the new planning system, the government will need to articulate a better system of training and staff development. The Institute and the Division regularly hold professional development events on a wide range of subjects including environmental impact assessment, sustainability, and climate change adaptation, with input from experts and peers who are leaders in their fields of environmental practice and policy.

EIANZ has an existing Certified Environmental Practitioner (CEnvP) certification scheme which certifies competent, experienced and ethical environmental practitioners. Within the CEnvP scheme, there are specialist Ecology and Environmental Impact Assessment categories. A requirement for involvement of independently certified environmental professionals would support reformed planning for the State and would assist in demonstrating integrity in the assessment process to the community.

EIANZ would welcome the opportunity to support the Department with certification and professional development for environmental practitioners within the planning system.

The Institute requests the opportunity to assist the NSW Government as an ongoing stakeholder during the development of the White Paper and Exposure Bill. If the Department requires any clarification on our submission, please contact the NSW Division at eianz.nsw@gmail.com.

Submitted on behalf of the EIANZ NSW Division.
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