

27 November 2016

Emma Kirkman
Senior Planning Officer, Planning Services Business Systems
Department of Planning and Environment NSW
GPO Box 39
Sydney NSW 2000

Dear Emma,

DRAFT PIA INPUT TO ENVIRONMENTAL IMPACT ASSESSMENT IMPROVEMENT PROJECT

The Planning Institute of Australia NSW (PIA) support the thrust of the discussion paper to improve the quality, fitness for purpose and timeliness of EIA evidence and documentation.

PIA support improved accountability for the sign-off of EIS's and key studies by a PIA 'Registered Planner' who meets the highest industry experience, education, competency and ethical standards relevant to the EIA process.

PIA's specific comments on the EIA discussion paper initiatives are outlined below:

Initiative 1 – Develop a consistent framework for scoping within the EIA process

- PIA support this initiative. Identification of the key issues specific to each individual project and requiring a level of environmental assessment that is commensurate to the relative importance of the issue is a major improvement and will refocus effort towards the critical issues.
- A risk ranking / assessment tool would assist in achieving this.
- The Department should take a leading role in coordinating the review of the Preliminary Environmental Assessment (PEA) with all relevant government agencies and seek to clarify any queries they have at this stage prior to receiving their submissions on the scoping document.
- Agencies should be required to provide "draft SEAR's" to the Secretary in defined areas for their relevant fields of responsibility and avoid long correspondence that is often difficult to articulate into the SEARs and EIS assessment process.

Initiative 2 – Earlier and Better Engagement

- Early and better engagement is strongly supported.
- Need to ensure that engagement can be done as part of the process and not adding time to the process.
- The Department is not well placed to lead consultation on behalf of a proponent or on project specific aspects.

- Guidance on the consultation that the department expects would be an improvement.

Initiative 3 – Improve the consistency and quality of EIA documents

- This initiative is supported.
- Department should consider a reintroduction of the adequacy review, this cannot be a merit assessment.
- If an EIS template is introduced it needs to allow enough flexibility to be adapted to all manner of projects.
- There is an opportunity for peer review but how this is rolled out needs careful consideration to avoid delays and complexity.

Initiative 4 – Set a standard framework for conditioning projects

- Consistency is welcomed.

Initiative 5 – Improve the accountability of EIA professionals

- Strongly support this concept for improved accountability and believe it will have a strongly beneficial effect on the utility and quality of EISs.
- PIA has introduced a new standard of certification for the profession: 'Registered Planner'. Registered planners will have the highest industry experience, education, competency and ethical standards relevant to the EIA process. Registered Planners are equipped to sign off on EIS and related studies.
- PIA would be interested in working with DPE on their expectations for competency and training of an accredited person accountable for EIS sign off.

Initiative 6 – Provide greater certainty on EIA timeframes

- Strongly support this initiative. Greater certainty will increase business confidence and certainty for capital investment in the NSW market.

Initiative 7 – Strengthen monitoring, auditing and reporting of compliance

- This initiative is supported. This will lead to improved environmental outcomes across NSW.

Initiative 8 – Project change processes following approval

- The direction of this initiative is supported. PIA would be available to develop the potential improvements with DPE further.

Should you wish to discuss the PIA response please contact John Brockhoff directly on 0400 953 025.

Yours sincerely,

John Brockhoff
Principal Policy Officer, PIA NSW