

12th May 2011

Secretary  
WAPC  
Albert Facey House  
469 Wellington Street  
PERTH 6000

Planning and Development Act 2005 Section 57 Amendment (Minor)

**MRS Amendment 1205/57: Southern River Precinct 3F**

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**Summary**

The Urban Bushland Council opposes the rezoning and recommends that the proposal be rejected and that the current zone be maintained or preferably that the area be rezoned for Parks & Recreation and added to the adjoining Bush Forever site. The land is not suitable and not capable for industrial use primarily because it is mostly palusplain wetland, the bushland has high biodiversity values, and the area is too close to Bush Forever site 413 and is hydrologically linked to it. The water table is relatively close to the land surface and disturbance of the land (drainage, dewatering) will have an unacceptable impact on groundwater relations affecting adjoining vegetation. Importantly Acid Sulphate Soils are likely to be present and any dewatering will cause acid events with irreversible impacts. Furthermore according to Bush Forever policy (Vol 1 p xiv) there is a presumption against clearing on the eastern side of the Swan Coastal Plain and therefore this area should not be disturbed and cleared. The proposal is therefore in breach of Government policy.

**Submission**

The study area analysed by ENV Australia is a much larger area than the current MRS site proposal, and the area studied by ENV to the north-east is already zoned light industrial.

**Wetlands and Managing water and the effect on bushland**

This MRS Amendment site abuts Bush Forever site 413. The Urban Bushland Council is concerned about proposed works including a headwork mains construction, a pump station and an odour buffer. We read that a compensation basin for a 10 year storm event has been identified to be located in the south-east corner of the site. Digging this in an area with acid sulphate soils (ASS) or potential acid soils (PASS) could result in expression of acid with irreversible impacts. Some or all of these proposals could have a serious effect on Bush Forever site 413 and on the vegetation on the MRS site. The Bush Forever site is such a wonderful site of great floristic diversity and is in excellent condition.

While many other bushland areas on the Swan Coastal Plain have experienced sudden deaths of Banksia and Jarrah and other plants because of climate change and lack of water, Bush Forever site 413 is looking healthy, with to date, only limited tree deaths. In *Bush Forever* volume 2, it states that:

*It is notable that small bushland areas on the eastern side of the plain have demonstrated an ability to maintain good condition after many years of isolation in an agricultural environment, provided that have not been subject to gross disturbance. (page 83).*

Also because the eastern side of the Plain has been over-cleared and is inherently highly biodiverse for flora, Bush Forever policy states that there is a presumption against clearing on the eastern side of the Swan Coastal Plain. Therefore this should apply to this proposal and clearing should not be permitted. The Planning Department should be aware of this.

It is obvious from looking at some of the maps available from the City of Gosnells website, that there is a reason why this land has not been developed. Namely the land is not capable of supporting developed land uses and is not suitable. ie it fails the *land capability* assessment and *land suitability* assessment tests. The area is one of high water levels and which is seasonally water-logged. Indeed this is palusplain wetland. **A very large area is mapped as Multiple Use Wetland on over 75% of the MRS site** and further to the north-west. (City of Gosnells; Southern River Precinct 3 Geomorphic Wetlands 2004)

Another City of Gosnells map, 'Summary of Wetland and Buffer Requirements' shows the buffer for the Conservation Category Wetland on Bush Forever site 314 as being within the MRS site and running almost the length of the site.

As the MRS Amendment document states:

*A large area of the subject land is mapped as a Multiple Use Wetland and a Resource Enhancement Wetland is located on Lot 16 [to the north east]. The Resource Enhancement Wetland appears to be in very good condition and vegetation mapping by ENV mapped it as being in excellent condition. The EPA urges that all reasonable measures are taken to minimise potential impacts on Resource Enhancement Wetlands and their buffers. These wetlands have the potential to be restored to a Conservation Category Wetland and rehabilitation is encouraged. This does not indicate support for clearing these areas, rather the opposite.*

**The issues identified by the EPA are:**

- Native vegetation and flora
- Fauna
- Wetlands
- Acid Sulphate Soils
- Contaminated Site.

It is interesting and disturbing to read that Mr Steven Radley, Team Leader-Regional Schemes, WAPC, believes that these factors raised by the EPA will not be 'fatal constraints' to the MRS Amendment and that the EPA *is unlikely to recommend the approval of projects that have a significant adverse impact on natural areas of high conservation significance.* Why is the approval being pre-empted? The EPA has not formally assessed this proposal.

The Urban Bushland Council WA has been advised by the City of Gosnells that the work commissioned by the City has resulted in Coffey Environments identifying a number of options for the MRS site, from clearing all to Option 4, retaining quite a bit, but not retaining all the native vegetation. These options are based on destroying varying extents of the environmental values of the site, rather than on retaining the values of the site as advised by the EPA and contrary to the Government policy of a presumption against clearing on the eastern side of the Swan Coastal Plain and the retention of wetlands.

## Vegetation

The vegetation on the areas to the south-east of the site, adjacent to Matison Road, is marked as being from very good to excellent condition. The diversity of this area of the site could be comparable to the Bush Forever site and of course, is part of the original vegetation. One part became Bush Forever and this area was omitted. These areas are regionally significant.

Page 3 of the MRS Amendment document gives advice from the EPA on 'Native Vegetation and Flora'. The points raised are;

- The site contains Floristic Community type 21C, listed as a Priority 3 Ecological community.
- Only 17% of the Southern River Vegetation Complex remains, therefore the vegetation is considered regionally significant. Because of this, a level 2 survey should be also undertaken
- Part of the site is an Environmentally Sensitive Area and thus is not exempt from requiring a clearing permit.

The Urban Bushland Council strongly supports the EPA in its statement that significant ecological communities and flora are of high conservation significance. We also believe that small areas of Banksia woodland, for instance in the north- western corner should also be protected. Of importance also is the area of Marri trees. The other disturbed or cleared areas serve as buffers to the wetlands and high conservation areas and should not be disturbed. Thus there is no basis in conservation values to justify disturbance and industrial use of any of the land.

## Fauna

A cockatoo roosting site should never be destroyed and we understand that the northern part of this site is a roosting site. Because the three species of black cockatoo are declining in numbers due to clearing of native vegetation in the Perth region and in the south west of Western Australia, and because of fragmentation of bushland, we know that black cockatoos need all the food which is available now. Therefore this area and a buffer zone around it should not be disturbed and the area is not suitable for rezoning and industrial uses.

We recommend your attention to the proceedings of our UBC symposium 'Endangered Black Cockatoos in Western Australia'. This symposium was held on 26 November, 2010. In conclusion and the call for action, Associate Professor John Bailey stated [The black cockatoos] *are not yours to put at risk by removing those trees from your property. They are yours to care for so that they will fly on to someone else's property.*

We need the black cockatoos to survive and to endure so that future generations of humans can continue to see them. Only 25% of chicks survive to adulthood so species recovery is very difficult.

As Black Cockatoo habitat the proponent of this proposal is obliged to refer it to the Commonwealth under the EPBC Act for the endangered Black Cockatoos. There may also be other listed threatened or endangered species of flora present which require referral under the EPBC Act.

Conservation of black cockatoo habitat allows other fauna to survive.

## **Conclusion**

**The wetlands on this site and associated native vegetation including Marri trees would not be able to survive clearing, ground disturbance, and having water extracted and groundwater flows disturbed for a Business Park or Light Industrial area.**

**Palusplain wetlands are subject to flooding and sound planning would recognise that developments should not be located on flood prone areas. Surely this lesson must be learned from the extensive and dramatic flooding this summer in the eastern states- where planning and developments ignored flood risks and put businesses, infrastructure and lives at risk with massive destruction and loss of life occurred. The 1 in 100 year flood risk mapping should be made publicly available for the MRS Amendment area.**

**Representatives of the Urban Bushland Council wish to discuss in person this proposal with officers of the Department of Planning and WAPC . We believe that there are very serious land use constraints and that there is a failure in the environmental planning process.**

C Mary Gray  
Vice President