

## SUMMARY AND KEY POINTS TO ASSIST SUBMISSIONS ON DRAFT PERTH AND PEEL 3.5 MILLION PLAN

### OVERVIEW

The Southwest Australia Ecoregion (SWAE) is one of 34 global biodiversity hotspots. Not only is it Australia's only hotspot; it is also one of the few found in a developed country. The Australian Government also recognises the importance of the SWAE's unique biodiversity. Five of Australia's 15 national biodiversity hotspots are located within the SWAE. For all these reasons, the SWAE is a vital and valuable part of Earth's natural heritage. Conservation of its biodiversity is the responsibility of all Australians. ***The Perth and Peel region lies within this global biodiversity hotspot.***

The WA Planning Commission is seeking public comment on four draft sub-regional planning frameworks by Friday 31 July 2015. Once finalised, the frameworks will become sub-regional structure plans and will be used by State agencies and local governments to **guide residential and industrial development**, and supporting infrastructure.

By 2050, 3.5 million people are expected to live in the Perth Peel Regions, placing pressure on our resources, social and physical infrastructure, services and the natural environment. So what will Perth and Peel look like by 2050 and how do we accommodate a substantial population increase without impacting on our valued way of life, **our precious natural environment**, and our crucial social and physical infrastructure?

### CONCERNS

The *Draft Perth and Peel 3.5 million Plan* is **fundamentally flawed** in the following ways:

- This draft plan appears to pre-empt the *Strategic Assessment of the Perth and Peel Region (SAPPR)* – the SAPPR process should precede this plan. These planning processes appear to be proceeding independently, and not being informed each by the other.
- It does not clearly and forthrightly indicate the impacts of proposed urban expansion on existing remnant native vegetation on the Swan Coastal Plain.
- The draft plan makes very little reference to Bush Forever – which is the whole of Government strategy for the protection of regionally significant urban bushland.
- Environmental constraints (such as low lying areas, palusplain wetlands) do not appear to be informing the resultant structure plan.
- It does not explicitly state the extent of clearing of native vegetation for urban expansion on the Swan Coastal Plain. However, implicit in the documentation is a completely unacceptable level of clearing of urban bushland.
- When overlaying the native vegetation maps over the draft structure plans, it appears that 2,500 ha of the 6,000 ha of native vegetation will be lost in South Metropolitan Peel region; some of the native vegetation at risk is of very high quality.
- Preliminary analysis of this draft plan shows that, across the whole area, up to 20,000 ha of bushland is anticipated to be cleared for development. There is currently 8 – 10,000 hectares of bushland 'up zoned'; this plan indicates that the number will double!
- There will be massive loss of native vegetation in the urban push northwards to Yanchep.
- There are elements of the plan that contain 'death by a thousand cuts' for urban bushland, and in particular the areas zoned rural residential. Ecological connectivity diminishes over time with the loss of part of the bushland on these rural blocks.
- It is impossible for interested parties to do an analysis of the impacts on biodiversity and bushland as the baseline data for the existing extent of vegetation, land capability assessment, floodplains and wetlands is not shown. Furthermore, this information is not generally available to the community.

- The grouping of land uses into broad, quite non-descriptive categories (e.g. 'open space') mask the range of options possible; is misleading to the point of dishonesty and is not consistent with an open and transparent process
- Extensive areas are mapped as 'Regionally significant Basic Raw Materials' especially in the north west sub region (p41) and many are shown on top of 'open space' and Bush Forever Areas! This is not clear on the small scale printed maps.
- Mining seems to be shown within the category Industrial. Mining use and 'industrial use' have different impacts on land and come under different State planning policies. It appears there are significant areas coded 'industrial' that are known to be mining. This lack of clarity about proposed purpose is totally unacceptable
- We believe that 'Industrial investigation areas' are proposed for use for dumping mining spoil given their proximity to current mines. **This is NOT an industrial use but is a mining use. The footprint is double or more than the size of the mine. This information is not provided.**
- The process to date has not included engagement with key stakeholders; consequently the information now available for public comment is grossly incomplete.

#### **WE RECOMMEND**

- The SAPP process should be allowed to run its course, and the outcomes of that process then used as inputs for the Draft Perth and Peel @3.5 Million plan.
- This Plan should recognise that the Banksia Woodlands of the Swan Coastal Plain have been nominated as a Threatened Ecological Community (TEC) and act as if the nomination has been upheld.
- There should be no further clearing of Banksia woodlands.
- All remaining native vegetation on the Swan Coastal Plain that is not in a completely degraded state should be classified as being "nationally significant" owing to its uniqueness, its ecological importance, its heritage value, its diminished extent, the species which it supports and the threatening processes which it faces.
- Mining should not be permitted in and adjacent to bushland areas
- Proposed urban infill rates should be increased to 80% of new housing and urban expansion should only be permitted on land cleared prior to 2015.

#### **SUBMISSIONS**

**It is vital you consider the potential impact for bushland in your region and make a submission to WAPC.** We have made this easy to do by providing a link direct to the online submission form and by providing an outline of the key issues and critical recommendations with regards our natural environment.

Feel free to use any of the points listed previously to help create your submission.

The website is: <http://www.planning.wa.gov.au/publications/3.5million.asp> . Submissions can be made online at <https://consultation.planning.wa.gov.au/perth-and-peel-planning/perthpeel3-5mill> as well as by completing their submission form and emailing to [3.5million@planning.wa.gov.au](mailto:3.5million@planning.wa.gov.au)

#### **Submissions due by 31 July 2015**

When making a submission, WAPC requests that you:

- identify which sub-region your comments relate to;
- include the section and/or page number;
- clearly state your opinion and the reasons for your opinion;
- if possible, outline alternatives or solutions to your areas of interest; and
- provide any additional information to support your comments.

The online form may be a bit challenging to navigate, but does promise that you can save your uncompleted submission and return to it later.

## SUB-PLANS

*Included below are some comments about statements and content within the various sub-plans*

Key pages in the sub-plans that refer to environmental considerations are indicated below.

In the North-West; North-East and South Metropolitan Peel sub plans there is reference to the Strategic Assessment process (usually Section 2.6) and then a section on Environment and Landscape (usually Section 3.7)

The SAPPR process page is written as if that **process is close to completed** and that this sub-plan will be fully recursive with SAPPR recommendations. However, the SAPPR process is not expected to generate public comment documents until late in 2015.

*The strategic assessment involves the preparation of a **Matters of National Environmental Significance** plan and related impact assessment report. The outcomes of this work will be reflected in the final sub-regional structure plans (where appropriate)*

None of the Environment and Landscape sections refer to the scale of loss of bushland as part of that plan; and it is not possible to interpret such information from the maps provided in the documents.

**Central** – Relevant section is Section 4.7 – Green Network – Page 36

Quotes from the documents: **Central** – 4.7 – Green Network – Page 36 Key statements: *safeguard existing green network components from fragmentation; and create and enhance existing green networks and identify ecological linkages to connect the green network and assist in the retention of habitat for significant fauna dispersal and migration*

**North-West** – Relevant sections are: Section 2.4 – SAPPR process – written as if that process is completed and that this plan is fully recursive with SAPPR recommendations. Section 3.7 – Environment and Landscape – contains references to Bush Forever including revegetation of BF 288 to connect BF sites 130 and 383. However, there is no statement regarding the LOSS of bushland from this area.

**North-East** -- Relevant sections are: Section 2.6 SAPPR; Section 3.7 – Environment and Landscape

Quotes from the documents: **North East** - *The sub-region has significant environmental attributes. Over 79,800 hectares, or 40 per cent, of the sub-region is protected as parks and recreation or State forests reservations under the MRS, which includes Bush Forever (Plan 8). Further conservation measures in the sub-region are being developed as part of the Strategic Assessment of the Perth and Peel Regions. State forest reservations may contain a variety of active uses, such as forestry, mining, recreation and heritage. Within the State forests there needs to be a continued focus on balancing these active uses with broader environmental outcomes.*

**South Metropolitan Peel** - Relevant sections are: Section 2.6 SAPPR; Section 3.7 – Environment and Landscape

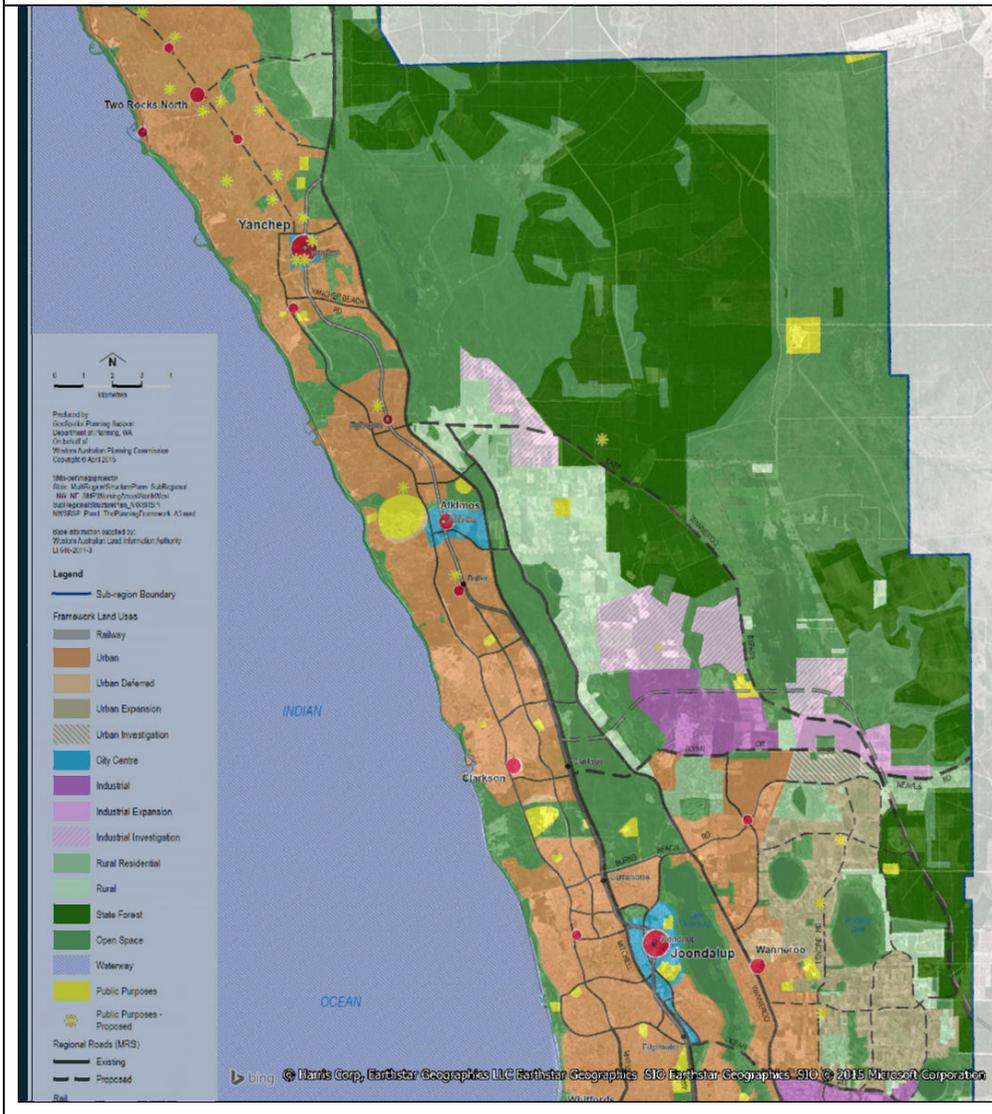
***In summary, the rhetoric in the plan is not reflected in our understanding of the likely environmental impacts foreshadowed in other sections of the Plan***

## QUESTIONS THAT ARE STILL UNANSWERED

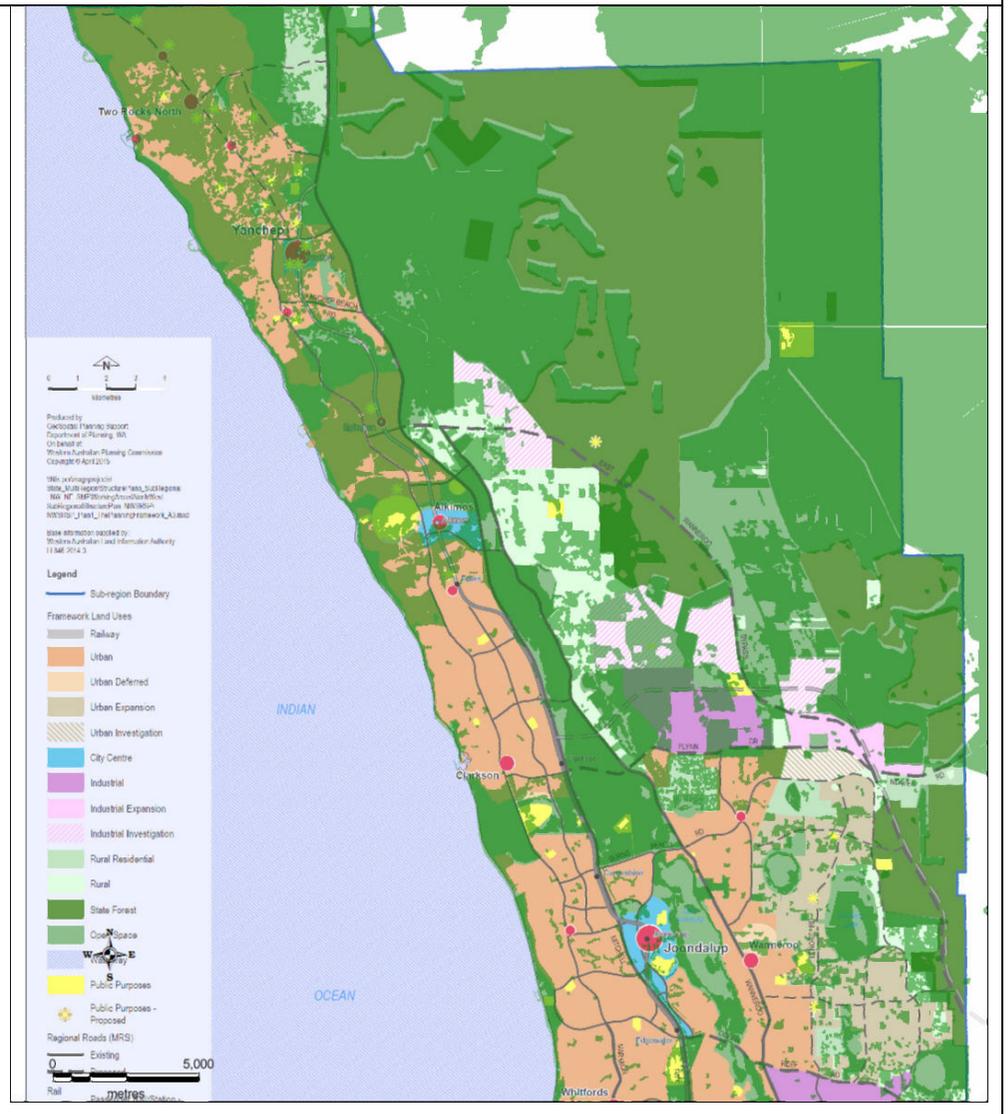
- For your region, will all the Banksia woodland be retained? How much clearing will there be?
- Will ecological linkages be retained and enhanced?
- Will wetlands and their buffer zones be protected?
- Will your local reserves be nibbled away on the edges by roads or other infrastructure?

LIKELY IMPACT ON BUSHLAND: COMPARING THE PLAN WITH CURRENT VEGETATION MAPS

Map 1: North West Sub-Plan Development Map



Map 2 North West Sub-Plan Development Map overlaid with current vegetation



Acknowledgement: Maps provided by Matt Giraud