17 December 2024

Comment – Have your say to DPLH

Metropolitan Region Scheme Amendment 1388/57 – Wattle Grove South, EPA Assessment No: 2335

The work required for the EPA's environmental factors is listed under:

1. Inland Waters
2. Flora and vegetation
3. Terrestrial fauna
4. Social surroundings
5. Greenhouse gases

Introductory statements

We note and comment:

> The EIA is being done concurrently with the MRS Amendment – the first one for more than a decade. (ER P361). We agree with identifying the necessary environmental conditions at the earliest stage in the process (where the EPA assessment is that environmental values can be maintained in the face of development)
>
> The EPA providing the WAPC with a list of 58 tasks that need to be evaluated and then incorporated into the published Environmental Review. Given the complex hydrology of the seasonally waterlogged flats (palusplain) and seasonally inundated basins (sumplands) of the general area (this area plus GBSW), and the considerable documented biodiversity of the Greater Brixton Street Wetlands, we support the focus on inland waters, flora and vegetation, terrestrial fauna, social surrounds and greenhouse gases.

We have considered the content of the Environment Review and its attachments and note their assessment as follows and **disagree** that this development will **not have** significant impact on the environment.

In summary it is considered that with the application of appropriate mitigation and management measures at the various identified stages of future planning and development approvals subsequent to the MRS amendment, the EPA's objectives for the key environmental factors will be met (P374)

No change to hydrological regime that will result in groundwater dependent vegetation to be impacted within the MRS amendment area or the GBSW as determined by a groundwater monitoring program. P 374

A potential loss of up to 29.54 ha of highly modified habitat types of compromising scattered trees (26.58 ha) and planted gardens (2.8 ha), as well as degraded to completely degraded Banksia Woodland (0.16 ha), which consist of predominantly of low-quality foraging habitat for black cockatoos, and 0.72 ha and 0.80 ha of medium quality foraging habitat for Carnaby's cockatoo and Baudin's cockatoo, respectively.

Loss of up to 0.16 ha of native vegetation fauna habitat, including breeding, foraging and dispersal habitat, from clearing. (P 375)

There appear to be some reliance in this Environmental Review on the reports prepared for City of Gosnells amendments and yet the EPA Report 1757 outlines why the EPA believes that there is not enough scientific certainty presented to set baseline conditions to ensure the threat of serious or irreversible damage to the GBSW and associated values is avoided. Given this, is the baseline monitoring of Wattle Grove South sufficiently robust that the water balance analysis generates reasonable estimates.

Cumulative effects of developments in and around Wattle Grove have already seen impacts on environmental values and the UBC's following comments on Inland waters, Terrestrial fauna, Flora and vegetation, and Holistic impact assessment, support values affected.

Inland waters

The Emerge Associates 2024 water balance report on the hydrological implications of the proposed development predicts no adverse impacts on the GBSW. With the data available, it is difficult to assess the validity of this conclusion, primarily because little or no information is presented on the hydrology of the GBS wetlands themselves. Given the critical importance of water inflows to the long term health of the wetlands, and the clear drying trend in southwest WA (driven by climate change and referred to explicitly in the Emerge report), this seems a major oversight.

Page 51, 52 of the Hyd2o report indicates that there will be an increase in surface water outflows directed towards GBSW and also MKSEA.

Modelling indicated surface water outflows would increase by 4,759 kL/yr compared to the existing condition and 13,674 kL/yr compared to the Amendment Area only development scenario. Of the additional 13,674 kL/yr as a result of UEUI development, 5,830 kL/yr is toward the GBSW area, with 7,844 kL/yr to the MKSEA open drains.

Should the City of Gosnells Town Planning Scheme 6 Amendments 166 and 169 (EPA Report 1757) be approved by the Minister for Environment then this project will **ADD TO** the surface water flows from those proposals. As noted in EPA Report, the proposed amendments have already been deemed to be at significant variance with the EPA's factor objectives (including inland waters).

It is the EPA Panel's view that the amendments as referred have residual impacts and holistic impacts that are significant and inconsistent with the EPA factor objectives for inland waters, flora and vegetation, and terrestrial fauna. The EPA Panel advises that baseline information and surveys are lacking comprehensiveness which is a significant limiting factor for the assessment. P7

The UBC believe that the MRS site is unsuitable for urban development. In addition the EPA Assessment of **THIS** MRS Amendment should be delayed until the Minister has made a decision on EPA Report 1757.

The precautionary principle must be employed.

The UBC supports the document and mapping by Daniel Jan Martin, University of Western Australia. His mapping of the 'permeable hydroplain shows that the subsurface flownet between the foothills and the Canning River flows through [the Wattle Grove south precinct] and feeds the Greater Briton Street Wetlands'.

The UBC supports the following statement: **'**A rigorous, long-term study by independent hydrologists should be commenced immediately to fully understand the hydrology of the

Greater Brixton Street Wetlands and to help determine how climate change, a drying climate and development will impact the wetlands and its plant species'**.** (Cate Tauss, December 2024)

Terrestrial fauna

BLACK COCKATOO:

The Cumulative Impacts Table 7-15 (P315) outlines the anticipated impacts for Black Cockatoos from adjacent projects but does not reference the data found elsewhere in the Report for this MRS Amendment. Those details appear in Table 7-14 Fauna habitat retained within conservation areas and potential maximum clearing impact (P307).

This table indicates that up to 29.54 ha of habitat may be cleared with the loss of up to 146 potential nesting trees. Table 7-15 identifies the potential loss of Black Cockatoo habitat of up to 66 ha and up to 537 potential nesting trees.

The Environmental Review document makes the case that the loss of potential nesting trees will be from degraded habitat and will not be significant. We argue that in terms of quantum this MRS creates **additional** losses of potential nesting trees of around 20%. Similarly, when considering habitat, the 5 projects in Table 7-15 identify a potential loss of habitat of up to 66 ha. The further loss of up to 29.54 ha in this MRS Amendment represents an **additional** loss of 30%. We note that this is referenced in the Offset Table 11-1 (P354) where the residual impacts for habitat for fauna as not significant and hence not requiring an offset.

We believe that more potential nesting trees should be protected and that the degraded habitat where they are located (those areas scoring 3 or 5 for foraging habitat) should be revegetated to restore biodiversity values. Refer to Figure 7-4: Carnaby's cockatoo foraging habitat (P294). Retaining these trees and revegetating those areas will have the added advantage of retaining canopy and supporting the City of Kalamunda's Urban Forest Strategy goals.

The City of Kalamunda's Local Biodiversity Strategy has been developed '*to guide the retention, conservation and management of Local Natural Areas for the perpetual wellbeing of our residents, enterprise, and ecosystems.'* The City's and that of the community's overarching vision is that they '*will protect, manage, and value the local biodiversity to ensure a lasting legacy for future generations.'* (Kalamunda.wa.gov.au)

Will this vision be able to be achieved if the whole area is rezoned urban?

Black cockatoos are being managed to extinction.

Over 2024 '…huge numbers of emaciated and starving birds are presenting to the Perth Zoo.' ' Heat and drought killed food trees and late rainfall meant seed did not get a chance to set.' (Perth Zoo)

Increasing temperatures due to climate change will threaten black cockatoos. In the summer of 2010, 150 Carnaby's Cockatoos and possibly some Baudin's died at Hopetoun. Further, at Munglinup, 37 white-tailed cockatoos, 6 regent parrots, one kestrel and other birds died. (WA Today Chris Thomson, ' Heat kills 150 endangered black cockatoos'. Jan 8, 2010)

'The birds [Carnaby's cockatoo] are in trouble, not only from clearing of native vegetation, but also from extreme climate events,' says Denis Saunders, who co-authored the scientists' recent paper for Pacific Conservation Biology.

‘Long-term survival of Carnaby's Cockatoos will be impacted by changes in rainfall, projected to be 16% drier in winter and up to 20% drier in spring, and by an increase in the number of days with maxima ≥35°C, conditions when the birds are unable to forage. Conclusions. This drying and warming is likely to lead to a further contraction in the range of Carnaby's Cockatoo’ (Saunders DA et al. (2024) A challenging future for Carnaby's Cockatoo (Zanda latirostris) under a changing climate.)

A judgement must be made that would give black cockatoos a chance to persist in Wattle Grove and associated suburbs. Loss of habitat through this proposal and **cumulatively** through clearing over the Swan Coastal Plain denies this chance.

SMALL BIRDS, PEREGRIN FALCON, CHUDITCH AND BRUSH-TAILED PHASCOGALE

The UBC also has concerns about persistence into the future of small birds. Extinct in Kings Park are the Western Yellow Robin, Scarlet Robin, Western Thornbill and Golden Whistler. However these birds are persisting *‘in the greater Yule Brook area and have the potential to return in good numbers if habitat restoration and ecological linkages are implement and maintained (Zelinova, 2019)’* (p288 Lambers Hans ‘A Jewel in the Frown of a Global Biodiversity Hotspot’ 2019).

Also of concern is the ‘Specially Protected’ Peregrine Falcon.

Listed mammals are Chuditch and Brush-tailed Phascogale.

The Carpet Python is and its habitat is ‘known to occur within area.’

The concern of the UBC is that future planning processes will not protect habitat for fauna under a blanket urban rezoning.

Flora and vegetation

Table 6-14 (p247) indicates that the potential loss of native vegetation on adjacent projects is anticipated to be more than 55 ha. Much of this has been categorised at Banksia woodlands TEC; with significant amounts assessed as having been in good or better condition.

The Environmental Review for this project indicates that efforts will be made to protect high quality remnant native vegetation on this site. This is commendable given the potential losses in nearby projects.

All remnant native vegetation (in Good or better condition), inclusive of all remnant patches of Banksia Woodlands TEC and probable FCT 20a, which makes up approximately 2.9% of the MRS amendment area, will be retained in Conservation areas.

Furthermore, all intact Southern River Complex and Forrestfield complex vegetation in good or better condition will be avoided, protected and managed. (P 245)

However, there is an opportunity to protect potential nesting trees, to revegetate more of the area thus improving environmental values.

We believe it is very important that the final design and boundaries of the proposed conservation areas be fully inclusive of all remnant vegetation and that this be required in future local structure planning. The cumulative effect of clearing around Wattle Grove and over the Swan Coastal Plain, and in particular, the eastern side of the SCP must be considered.

Holistic Impact assessment

Table 12.1 (p358, 359) clearly and unambiguously outlines the risks and impacts of clearing vegetation, the alteration of natural drainage regimes and the physical presence of future development on inland waters, flora and vegetation, terrestrial fauna, social surroundings and greenhouse gases and references the need for engineering or management solutions to all of these.

The UBC endorses the advice given by the EPA in the document 'Environmental values and pressures for the Greater Brixton Street Wetlands on the Swan Coastal Plain – Advice in accordance with section 16 (J) of the EPAct 1986. The following quote is an example of the regard the EPA has for the Greater Brixton Street Wetlands.

The EPA has identified that a high level of protection and coordinated management is critical for the GBSW. There are opportunities to expand the Class A nature reserve within the GBSW and its buffers to create a more contiguous reserve system. Improvements to the coordination and management through a shared and expanded partnership involving all relevant groups including, Traditional Owners, would allow for holistic management of the entire GBSW area.

And:

'Direct and indirect impacts to the environmental values of the GBSW should be avoided to the greatest extent possible and practicable.'

Thus, the UBC's concern is for any development that would compromise the amazing GBSW.

Should this MRS Amendment be supported by the EPA, we recommend the most stringent of conditions and monitoring with the desired outcome being the full protection of GBSW, Yule Brook and the survival of black cockatoos.

With thanks

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