

19 May 2010

Secretary  
Western Australian Planning Commission  
469 Wellington Street  
PERTH WA 6104

Dear Sir/ Madam,

**Submission re Metropolitan Region Scheme Minor Amendment 1187/57  
High Wycombe Urban Precinct  
(This is an attachment to Form 57)**

The Urban Bushland Council presents the following comments regarding the MRS Minor Amendment 1187/57 described above. We wish to make a presentation to a hearing.

The Urban Bushland Council has a number of environmental and planning concerns regarding the proposal to rezone a substantial parcel of land (31 ha) in High Wycombe from Rural to Urban for the purposes of facilitating residential development of the subject land.

**We therefore recommend that the rezoning not proceed.**

As the land is predominantly privately owned we have had limited opportunity to survey the area physically but it is quite apparent that it contains substantial wetland areas and at least some remnant native vegetation.

**1. Kewdale-Hazelmere Masterplan**

The Urban Bushland Council notes that the Amendment Report makes reference to the *Kewdale-Hazelmere Integrated Masterplan (2006)* as setting some kind of guideline for the future land use in the region – though not for the specific site. The UBC raised numerous concerns in its submission on the *Masterplan* regarding the apparent disregard the document exhibited regarding the value of the remnant native habitat in the areas its authors envisaged being developed. The UBC was emphatic in its view that much of the remnant vegetation in the area was of high conservation value because of its inherent biodiversity typical of its location on the eastern side of the Swan Coastal Plain and because it contributed significantly to the connectivity between some important conservation remnants on the urbanized portion of the Swan Coastal Plain and the foothill/scarp area – for example, the Darling Range Regional Park and Perth Airport (Bush Forever Site 386), Dundas Road Bushland (Bush Forever Site 319) and Hartfield Park (Bush Forever Site 320) and beyond.

**2. General conservation values of remnants, especially ecological connectivity**

We would make the general comment that rural land which does not necessarily contain remnant native vegetation in good condition can still have strong conservation values in providing a buffer between conservation remnants and intense urban development, and in providing habitat for native fauna travelling between remnants in a more natural and undisturbed state. Furthermore, it has long been our observation that native fauna does not always require habitat in optimal condition to sustain significant populations. Many native bird species, for example, are in decline on the Swan Coastal Plain – primarily because of habitat loss. It has been our observation that native birds are able to survive in, and traverse, rural areas far more readily than is the case in intensively urbanised areas with roads and buildings. This fact is routinely ignored by environmental assessment processes in this state and whereas the Assessment Report refers to the likely “alienation,” and “incompatibility,” and “isolation” of the subject land if it were to remain zoned rural (page 2) the Urban Bushland Council is becoming increasingly concerned about the “alienation,” “incompatibility,” and “isolation” of some of our city’s most important

conservation remnants because so little consideration is given to the need for ecological links and interconnectivity.

### **3. Airport noise and amenity values**

The Western Australian Planning Commission undoubtedly feels a responsibility to prepare for anticipated population growth – and these judgements are based on forecasts not inevitabilities – it also has a responsibility to allow people a reasonable quality of life and to protect our natural and cultural heritage. The UBC has some familiarity with environmental issues pertaining to Perth Airport and although our primary interest is in the protection of native biodiversity, we find the continuing residential development of land very close to the airport and the scant attention it receives in the Amendment Report somewhat puzzling. *Like other airports, Perth Airport is extremely noisy.* If the Planning Commission thinks this does not detract from the quality of life of the surrounding residents then it really needs to do some research. A proposed parallel runway would bring aircraft noise even closer to the subject land and the wisdom of opening up new residential developments so close to such a relentless source of unavoidable noise has to be questioned.

The noise issue is addressed using the usual jargon which is unintelligible to the ordinary reader and which in practical terms does very little to change the fact that people who live in any residential circumstance in that area are going to be affected by significant if not intolerable airport noise. If residents complain about the noise or request some assistance with noise abatement such as insulation or curfews they will be told they “chose to live next to an airport.” This is where rezoning becomes problematic. If residential development is permitted then potential residents have a right to assume some authority has made some reasonable determination that it is a suitable place to live and not simply a place made available for those who could not afford to live somewhere where conversations, telephone communications, and television programmes – not to mention trifles like sleep - are not interrupted every five minutes, or at the most ungodly hours, by roaring jet engines. People who currently live in such circumstances who protest the noise also face the quandary of “talking down” their own real estate values so the real level of dissatisfaction is difficult to gauge. Broadly speaking, it is obvious that airports and residential developments do not mix well.

We note that the EPA's report did not mention noise assessment and this is a serious omission.

**We recommend that the WAPC seeks advice, including modelling data, from the EPA and the Department of Environment and Conservation (DEC) and other independent noise experts concerning noise before consideration of rezoning.**

**Further we recommend concerns of residents in urban areas which are already too close to the Airport be studied closely.** Surely lessons of prevention can be learned from the extensive noise impacts suffered by residents in Sydney from Mascot Airport.

### **4. Acid Sulphate Soils and Munday Swamp**

The UBC is very concerned that preliminary investigations reveal that there is “a generally high risk of acid sulphate soils occurring” (page 3). Surely this matter should have been investigated more thoroughly before the Amendment was released. It is our view that a high risk of acid sulphate soils occurring militates against the proposal to change the current zoning in that significant disturbance of the earth would, in all probability, affect the wetlands in the subject area detrimentally. Our members report seeing quite substantial areas of seasonal surface water on this site and any acidification problem might also drain off site. Perth Airport's nearby Munday Swamp receives some drainage water from High Wycombe and we would definitely be concerned if there was any prospect of the drainage system delivering acidic or polluted water to that wetland in particular.

### **5. Vegetation habitat values**

Desktop studies of the site are hardly likely to reveal rare or priority species or threatened ecological communities. Because so much of the site is in private ownership and thus inaccessible to us, we are not sure of the full extent of the remnant vegetation on the site though there are obviously good stands of native paperbarks and some indigenous Eucalypts. We noted an area of banksia woodland along Adelaide Street with excellent trees but little native understorey. The livestock observed in this particular area, including

goats, would hardly be helping in this regard. Nevertheless, the remnant trees all have habitat value and the wetlands themselves could support such fauna as a range of frog species. From our observation the Southern Brown Bandicoot could be expected to be found in the Amendment site as it is common in that region and does not restrict itself to pristine habitat by any means.

#### **6. Aboriginal heritage**

In terms of Aboriginal heritage, it is, in our view, quite possible that there would be some Aboriginal artefacts present on the site as there are numerous artefact scatters not far away at Perth Airport – at least there were until the Commonwealth Government approved massive development projects on airport land. We are yet to see any project halted or even modified in the face of evidence of Aboriginal heritage of this nature.

#### **7. Wetland Ecosystem**

We would agree with the EPA's advice that the wetlands on the site could be rehabilitated to Conservation Category Wetland status so the protection of the wetlands should be guaranteed at some stage of the planning process. Residential development of the site, however, would hardly be conducive to the protection of the wetlands ecosystem either in the short or longer term. These wetlands provide habitat for such fauna as amphibians and waterbirds but both need more than simply the seasonally inundated areas to survive and breed. We agree that the riparian native vegetation needs to be retained but the surrounding pastures and damplands add to the ecological value of the system as well.

#### **8. Carnaby's Cockatoo habitat present**

The EPA's advice makes no mention of the banksia woodland on the site and although the parts we have seen appear to have a very disturbed understorey, this still constitutes habitat for native honeyeaters and Carnaby's Cockatoo. The latter species is seeing its food resources on the Coastal Plain diminish every year and from our observation it makes use of every stand of banksia woodland it can find.

#### **9. Unacceptable environmental impact**

In conclusion, the Urban Bushland Council is of the view that rezoning the subject land from rural to urban for the purposes of facilitating residential development will have a deleterious environmental impact on the site and on the region. The wetlands and remnant native trees on the site constitute habitat that can be utilized by native fauna moving between larger conservation areas such as those on the at the foot of the scarp and at Perth Airport. Acid sulphate soils pose a risk to wetlands and this area has been identified as being of high risk. Urban development brings drainage and significant disturbance to complex groundwater ecosystems. Contributing to our view that the rural zoning is more appropriate for the area is its susceptibility to considerable impact from airport noise – particularly into the future if and when a planned parallel runway is constructed.

Yours faithfully

C Mary Gray  
President  
Urban Bushland Council WA