



18 February 2015

Mr Stuart Jardine
Chief Executive Officer, City of Stirling
25 Cedric Street,
Stirling WA 6021

Via email: stirling@stirling.wa.gov.au

Dear Mr Jardine

LOCAL STRUCTURE PLAN – LOTS 1 AND 2, HOUSE NUMBERS 2 AND 10 GAY STREET, DIANELLA (CHANNEL 9 SITE)

Prepared by Roberts Day on behalf of Swan Television & Radio Broadcasters P/L

The Urban Bushland Council WA Inc. is the peak community association concerned with the protection and proper management of urban bushland in WA. We have some 70 member groups, mostly Friends groups, who assist in the care and management of public reserves and local bushland, as well as raising awareness of, and education about, the values of our unique natural landscape, its flora and fauna.

The Friends of Dianella Bushland and the Wildflower Society of WA are both members of our Council and we commend their submissions to you, noting that both organisations have extensive expertise and knowledge of the Dianella bushland.

SUMMARY

- 1. The Urban Bushland Council does not support the Local Structure Plan (LSP) in its current form. It is a major concern that the Plan includes some serious omissions, flaws and errors of fact. It omits the fact that the bushland in Lot 1 Gay Street is part of the additional nominated Bush Forever site No. 4. The Plan needs to be reviewed and amended accordingly.**
- 2. We strongly recommend that it be amended so that no housing development occurs on Lot 1 Gay Street, and that only medium – high rise development occurs and is confined to Lot 2 Gay Street.**
- 3. Most importantly, we strongly recommend that Lot 1 Gay Street be withdrawn from this development and be acquired by the WAPC - as part of the Bush Forever nominated site 4 - and then be added to Bush Forever Area 43 together with the 5.5ha WAPC bushland as planned by DOP/ WAPC. This would then complete the implementation of the nominated additional site 4 for the (former) channel 9 bushland. It is further recommended that the whole of the enlarged Bush Forever Area be ceded to the Crown and managed by the City of Stirling.**

SPECIFIC COMMENTS

1. Strategic vision

The Executive summary of the LSP *'...is consistent with the City's Strategic Vision of a green leafy character dominated by trees, parks and bushland'* as in the Dianella Local Area Plan.

However the LSP is not consistent with this as it includes bulldozing of the bushland in Lot 1. This is a flaw in logic giving incorrect justification for clearing.

Further on page 22, it refers to Directions 2031 which calls for higher density and again quotes the above 'green leafy characterand bushland'. High density is readily suited to Lot 2 Gay Street and can take advantage of the high landscape aspect with wonderful views to the east, and into adjacent and nearby bushland if Lot 1 is retained as a natural area.

2. Conservation intents not met

On page 21 the LSP states 'the intent of the precinct Plan is to ... promote conservation of environmentally significant areas.' And also '....ensure that community aspirations are appropriately considered.' Neither of these is achieved. Bulldozing bushland is not a 'promotion' of bushland and the LSP is inconsistent with this intent and also with community aspirations for retention of the high quality bushland in Lot 2.

3. Conflicts with Bushland Policy SPP 2.8

Section 1.4.4 states 'the proposed development of the subject site is not considered to have an adverse impact on the Bush Forever Area'. It does not even state that Lot 1 Gay St is actually proposed for addition to Bush Forever Area 43. **ie it is a Bush Forever Area.** This is not acknowledged anywhere at all in the LPS document or its appendices. This is a serious flaw by omission of fact.

The vegetation in Lot 1 is the critical linkage between the Cottonwood Crescent bushland (north of Gay St) and the adjacent channel 9 bushland (to the south of Lot 1) now owned by WAPC. It is nonsense to remove this vegetation and claim that the trees on the other side of the road can be an adequate ecological linkage. The LPS plans to destroy the existing linkage.

4. Presence of listed endangered species and MNES under EPBC Act; and DRF

The bushland in Lot 1 is Banksia woodland and it is habitat for the endangered Carnaby's Cockatoo. They have been observed there by our members. The area would also likely be habitat for the migratory Rainbow bee-Eaters, which nest in bare sand. These are serious omissions which amount to errors in section LPS 2.1 on page 24.

The Declared Rare Flora *Caladenia huegelii* may also be present.

5. Regionally significant bushland is present

The LSP claims that the vegetation in Lot 1 is not regionally significant. This is an error of fact. The maps of vegetation condition show that most is in excellent, very good or good condition, a situation which alone shows that the vegetation is actually regionally significant.

Even the value of Lot 1 vegetation as the linkage between to 2 adjacent high conservation value bushland sites makes it regionally significant. The LSP does not use the correct definition of regional significance and the claims made are nonsense.

6. Threatened Ecological Community (TEC) may be present

Given the known substantial presence of a Threatened Ecological Community (TEC) in the adjacent WAPC bushland (E A Griffin; B J Keighery), a more thorough and rigorous flora survey should have been conducted. This TEC may be present in at least part of Lot 1 as the channel 9 bushland is regarded as including a transition zone from Karrakatta Central & South complex and Bassendean Central & South complex. The area is of particular interest as the Floristic Community Types appear unusual and are not yet clearly identified (B J Keighery pers. comm. 2008).

Thus it is an error of fact to claim the vegetation of Lot 1 is not regionally significant, and that it is not a Bush Forever site. This fundamental flaw means that the LSP requires revision so that the Bush Forever site status of Lot 1 and its conservation values and regional significance is recognised and that Lot 1 vegetation is totally retained.

7. Gay Street to be closed at Dianella Drive

As part of the Structure Planning for redevelopment of the area, it is strongly recommended that Gay St be closed to vehicles entering from Dianella Drive.

The tall cyclone fences should be connected across Gay St along Dianella Drive, and the tall fences removed from each side of Gay St between the 2 bushland areas to facilitate all

fauna and pollinator movement. Currently very little traffic goes up Gay St, but this would change markedly with the housing redevelopment of the media zone area and sever the conservation area. A defined pedestrian pathway could be located on the existing road to enable residents' direct access to public transport on Dianella Drive.

The total area of the two bushland areas of Cottonwood Crescent and channel 9 is approximately 20 ha and it is important that they be linked as one reserve – as is proposed with the addition of nominated Bush Forever site No. 4 to Bush Forever Area 43.

Road access to the Channel 7 and 9 areas to be redeveloped can easily be located or relocated from the north, west and south-west sides. This will facilitate easier and better management of the bushland while still providing easy access to the new housing developments.

It is imperative that the City of Stirling reviews the road entries to the whole of the former media zone in an integrated approach. This has not been happening and is we believe a failure in proper local planning by the City.

8. Flora surveys and inadequate information provided in LSP

The flora surveys are profoundly inadequate and indeed flawed and do not recognise the botanical data collected in earlier surveys for the channel 9 bushland which shows the outstanding regional significance of the bushland. The Bush Forever status of the channel 9 bushland is omitted. This is unacceptable and must be corrected.

The City of Stirling must be aware of this status and should recognise that the LSP is inconsistent with this evidence. Therefore the City of Stirling should review and adjust the LSP so that lot 1 Gay St is excluded from clearing and housing development.

9. Revise housing plan for Lot 2 Gay St

We submit that Lot 2 is an ideal location for high rise development and that this is in line with Directions 2031 (see 1 above), increasing density near main public transport routes (Dianella Drive), energy efficiency, and aesthetically pleasing views and nearby contact with nature which enhance human health and enjoyment.

CONCLUSION

The Local Structure Plan requires considerable revision so that Lot 1 Gay Street is excluded from housing development and is acquired and ceded to the Crown, formally added to Bush Forever Area 43, and managed by the City of Stirling for the purpose of nature conservation and public appreciation.

Further, Gay Street should be closed at Dianella Drive and fencing modified so that all the bushland is properly connected and fenced, with gates, signage and appropriate tracks for public access and appreciation of nature. New road entries for the redevelopment areas in channels 9, 7 and 10 areas need to be planned in an integrated way for the whole area.

Representatives of the Urban Bushland Council request the opportunity to discuss these important matters with you. I may be contacted directly by phone 9444 5647 or by leaving a message at our office 9420 7207, email ubc@bushlandperth.org.au

Yours faithfully

President.