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The Appeals Convenor
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Appeal against the granting of a clearing permit, Nowergup, City of Wanneroo, proponent Quito Pty Ltd for turf production, 17.32ha CPS 688/1

The UBC's appeal against the granting of a clearing permit is based on three considerations.

1. Water consumption for turf production.

Across the Swan Coastal Plain vulnerable native species are dying because of a falling water table due to reduced rainfall, reduced recharge and a warming climate. Extraction of water from the Gnangara Mound is occurring beyond what is sustainable; we are using more water than is being replaced. Turf production requires high water use and is therefore a highly undesirable activity. Already it is considered that there are 150,000 bores on the Gnangara Mound (Conservation Council WA). Horticulture and agriculture used 18% of the total water use from the mound (2004 figures, Department of Water)

If irrigation for turf production is conducted above ground, evaporation is an important factor in water consumption. (One turf farm, Greenacres Turf Farm, recommends surface irrigation rather than below ground irrigation as the best method as turf does not come to the surface with below ground irrigation)

2. Fertilizer/herbicide use.

Required fertiliser and herbicide use is detrimental to the environment through its potential to contaminate ground water. Within the suburb of Nowergup are the Neerabup National Park and a chain of wetlands which include Carabooda Lake, Nowergup Lake, Neerabup Lakes and smaller lakes. These lakes are surrounded by swampy land and land subject to inundation.

Fertilizer intrusion into waterways promotes algal blooms with a high cost to the environment.

3. Protection of remaining remnant vegetation.

The draft of the Department of Water's "Gnangara Groundwater Areas Water Management Plan", now open for public comment states (page 14)

The Gnangara mound once supported large areas of groundwater-dependent native woodlands, primarily *Banksia*. With urban, agricultural and forestry development these woodlands have been progressively cleared, as they have throughout the Swan Coastal Plain. *As a result, the remaining remnant vegetation on the mound is considered regionally significant*.

Seventeen hectares is a significant area of bushland to be destroyed for a high water use industry and the UBC objects to the granting of the clearing permit for this proposal. Yours faithfully

Margaret Owen Secretary Urban Bushland Council WA