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Industrial Land Strategy 2009; Perth and Peel
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Industrial Land Strategy 2009 Perth and Peel

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Interest Peak community association for the conservation of urban bushland

Background

The Urban Bushland Council WA is the peak community conservation body for urban bushland. We have around 60 member groups and are also supported by individuals.

'And what we've got to learn about fairly quickly is that bushland is disappearing by the death of a thousand cuts before our very eyes. At some stage we have to say that we want to look after a certain percentage and hand it on to future generations.'

Prof Steve Hopper 2000 (now Director Kew Gardens, London UK).

We note the ILS comment in 1.8 that industrial land demand forecasting is limited (unlike the future residential demand) because *there is little known or factored into the planning for industrial land to ensure that the end product will cater for the end users' needs*. The projected area needed for industry in the Perth Peel area is 4726ha to 2031.

The UBC objects to applications to clear bushland. It would be most unfortunate if a clearing permit was granted or vegetation destroyed for proposed industrial development.

We also note in 2.2.2 that one of the key demand drivers for industrial land is the issue of population and settlement growth. It is stated that

'Directions 2031 anticipates that the current population of 1.65 million in the Perth and Peel regions will grow to more than 2.2 million by 2031, requiring an additional 330,000 houses and 350,000 jobs.

The West Australian, Monday March 22 2010 reports that Perth and Peel's population will double from 1.7 million within just 35 years.....

In our finite world, we can see that continuing population growth is not good for our planet. We cannot keep growing, consuming, polluting and destroying our environment. The level of anthropogenic impact on our world is causing terrible consequences and the urgency required to tackle the problems is lacking from government. And this is happening in the Perth region on the unique but fragile Swan Coastal Plain.

'Perth's biodiversity is one of the highest recorded in any major city' (Bush Forever Vol1:vii, Dec 2000) Indeed the Perth region lies in one of only 25 biodiversity hotspots in the world, internationally recognised for conservation priority. Further we believe that in a sustainable society *nature is no longer being destroyed* but we are still bulldozing natural landscapes rich with biota for housing and industrial development.

This ILS shows that unsustainable development and growth is still government intent.

General comments

The Urban Bushland Council is dismayed at the failure of the ILS to rigorously select areas on the basis of land capability and land suitability assessment. Natural landscape constraints and first priority uses have not been used to *exclude* areas for industrial use. These include:

- P1 areas on the Gnangara (and Jandakot) Mounds being catchment areas for Perth's drinking water supply
- Bush Forever sites
- Conservation Category Wetlands and other wetlands and their buffer zones
- the catchment of sensitive Ramsar wetlands - Lake Forrestdale
- Palusplain Wetlands and damplands
- Habitats for Rare and priority flora
- Threatened Ecological Communities

Throughout the ILS there is a tendency to dismiss and downplay the environmental constraints and realities of the landscape. Advice from DEC is often contradicted. This is totally unacceptable.

In a revised ILS, we recommend that the areas which are currently P1 areas of the Gnangara Mound (Pinjar South and Whiteman), South Forrestdale, Greenlands Road, and parts of other areas as detailed below be removed from the proposed industrial land use.

For each of the 6 priority sites in section 3.2.2 the first map does not have a key making it impossible to decipher the context for each area. This is unacceptable and should be included.

Pinjar South and Whiteman

1. P1 Underground Water Pollution Control Areas

Under 3.3.2 we note that *two of the sites*, (of the six sites *afforded a higher priority based on their attributes and characteristics, and their subsequent preference for being developed in the short to medium term*) Pinjar South and Whiteman are located in Priority 1 areas of the Gnangara Underground Water Pollution Control Area.

There should be absolutely no development at all on P1 areas.

The principle of prevention and the precautionary principle both apply when dealing with catchments for potable or indeed other water supply.

The table on page 28 states that: '*investigation into the removal of the Public Water Supply Area classification is required*'. It is unbelievable that the ILS has presumed that the P1 boundaries will be removed from the proposed industrial areas. It is remarkable that no scientific or factual basis has been stated for this. However, public water will still be taken from the Mound, thus its classification is appropriate. The convenience of simply moving the P1 boundary to suit a preference for dealing with the Crown rather than many private landholders, or to suit cadastre or the ready access direct to groundwater (for industries) is totally unacceptable. We are aware that this idea arose in the draft Gnangara Sustainability Strategy and we strongly opposed it.

The P1 areas are the intake areas, *ie* the catchment for the groundwater storages and must remain protected. If there is chemical contamination on part of the Mound it will not be possible to remove it so the only sensible and practical approach is to prevent it forever by not allowing all potentially polluting land uses. This means all types of development. We do not believe that anyone would propose industrial land uses in the Mundaring Weir surface water catchment in the hills and if they did there would be a public outcry. The situation is the same for the intake areas of the Gnangara Mound. The controls of the UWPCA must always apply.

Indeed the UWPCA was put in place after very thorough research undertaken in the 1990s. In December 1994, M F Board MLA presented the Western Australian Legislative Assembly's *Select Committee Report on Metropolitan Development and Groundwater Supplies*. It recommended groundwater protection zones in

order to maintain the highest water quality. The findings are just as relevant today and we recommend that this report be studied again for the ILS and its findings followed.

In addition the CRC for Water Quality and Treatment has produced two relevant reports - nos 24 and 29. *Recreational Access to Drinking Water Catchments and Storages in Australia*, (Research report 24) also includes ten relevant guiding principles of the Australian Drinking Water Guidelines, for example:

- Prevention of contamination provides greater surety than removal of contaminants by treatment.
- The most effective barrier is protection of source waters to the maximum degree practical.
- Water suppliers should adopt a preventive risk management approach, as stipulated in the ADWG, to maintain the supply of water at the highest practicable quality.
- The guideline values should never be seen as a licence to degrade the quality of a drinking water supply to that level.

Source water Quality Assessment and the management of pathogens in Surface Catchments and Aquifers Report No 29 emphasis the problems with risks of chemical contamination of groundwater. This risk would always be present with industrial land use on P1 or P2 areas. We have already seen an example of the pesticide Atrazine contaminating the superficial aquifer in the Perth region and there are many other examples of contaminated plumes. These risks should never be entertained on P1 areas and therefore present a fatal flaw. Thus the ILS should have removed the Pinjar South and Whiteman proposals.

There is very strong opposition from the local community to industry in the Gnangara area as evidenced by the recent demonstration in which at least 400 people participated. The proposal for industry in this area *is considered* (by the local community) *as poor government planning and shows a disregard for environmental reports commissioned by previous governments and has left residents living near the Gnangara Mound, which provides the bulk of our city's water supply, under threat of a proposed enormous industrial area.* (www.wancrew.org)

Page 31 Key Actions

Action 4. *Investigation into the potential reclassification of wetlands*

This statement is indicative of the lack of respect for sites which are seen to constrain the opportunity for industrial development. Presumably the wetlands are not going to be reclassified for greater protection. If the wetlands are drying, this is because of our impact on the earth and industrial use on P1 and P2 areas would remove even more groundwater aggravating wetland decline. Concrete pads up to the minimum buffer are counter to good health and survival of the wetlands into the future. If wetlands were linked between each other and to local bushlands, rather than being reassessed so that the minimum buffer will apply, they would have some chance of maintaining values into the future.

The same applies to Whiteman where the issue under Environmental sensitivities, page 32, is *Resource enhancement wetlands can be further assessed to determine the full extent of conservation value that should be attributed to them, with the potential to increase the developable area.* Under the Wetlands EPP we are not supposed to be protecting and not destroying any more wetlands on the Swan Coastal Plain.

Notably an MRS Amendment to rezone Whiteman to urban was disallowed by the Parliament only recently. It was the Liberal party and the Greens who supported the disallowance, one of the reasons was its status as P1.

Bullsbrook South

1. Proximity of Western Swamp Tortoise habitat

In the Bush Forever document, the fauna for Ellenbrook Nature Reserve and adjacent bushland, Upper Swan, site 301, is listed as the *critically endangered* Western Swamp Tortoise and the Quenda. Proposals which would affect the Ellenbrook Nature Reserve are unacceptable. Habitat destruction and fox predation are listed as the major causes of the decline of the Western Swamp Tortoise. The proposed Bullsbrook South area is in the same catchment of Ellen Brook but is upstream. It would bring increased human presence which could be a potential problem unless very well managed.

2. Nutrient loads and drainage

There is no discussion of the sensitivity of the Ellen Brook catchment to nutrient loads. While the constraint of drainage is listed, it is dismissed as a minimal impact which is not expected to be a constraint. This is incorrect as it will be a very significant factor requiring major infrastructure, the area being subject to the Swan and Canning Rivers Environmental Protection Policy (EPP).

Ellen Brook is the single biggest contributor of nutrients to the Swan River. Although the Ellen Brook catchment comprises less than 1% of the total Swan-Canning catchment area, it contributes 36% of the phosphorus load to the Swan-Canning Estuary (Deeley et al 1993). Importantly, Ellen Brook also accounts *for 60% of the soluble phosphorus load to the Estuary, all of which is considered to be available for algal growth.* (Interim Ellen Brook Horticulture Strategy DEP 1997, approved for implementation by the then Minister for the Environment).

The primary sources of nutrients to Ellen Brook are broadscale agriculture, point sources of intensive agriculture being mainly market gardens on the poor soils of Bassendean, Yanga, Southern River, Coonambidgee and Mogumber soil associations. On these soils nutrients are not retained and are exported to groundwater and waterways very quickly. Industrial land uses are potentially less harmful, where landscaping would be the main source of nutrients, ***but only if very strict guidelines are enforced.*** This should include: the complete absence of turf lawns or fertilised and watered grassed areas; no use of fertilisers (all types); and exclusive use of local native plants in landscaped areas and roadsides. Whilst sounding restrictive, this presents an opportunity to enhance the connecting wildlife corridor along Ellen Brook and across the landscape to wetlands and bushland areas. It also presents an opportunity to showcase the beautiful native plants of the area which are perfectly adapted to the soil conditions.

Some of the heavier alluvial soils in the east of the area are suitable and are used for agriculture - as shown on the map 'prime agricultural land'.

We recommend that these areas be excised from industrial uses and be retained for agricultural uses.

On the other hand the ***two poultry farms shown on the map on/near wetlands should be removed and relocated out of the Ellen Brook catchment as they are incompatible and highly polluting uses.***

3. Retain native vegetation and wetlands

The table on p36 states that *'no significant clearing of native vegetation is expected'*. This is a meaningless statement which is open to selective interpretation. We presume it means there would be some clearing of remnants and isolated trees. ***We recommend that no clearing be permitted as all native vegetation is essential for wildlife habitat and connectivity across this over cleared landscape, and for protection of the fragile soils and their role in minimising nutrient export.***

The wetlands and their buffer zones should all be strictly maintained and managed with no incursions.

4. Drainage

Stormwater drainage should be retained on site by the comprehensive use of water sensitive urban design. Guidelines were produced for this many years ago and these principles are used in other places. This means there would be no piped drainage to Ellen Brook or its tributaries. Swales adjacent to buildings should be designed to hold stormwater. As stated it is critical that fertilisers not be used at all.

5. Sewerage and wastewater

On p36 it states that there is no wastewater treatment infrastructure on the site. There is no other statement. Provision of mains sewerage will be essential. If treatment is to be on site, it should be tertiary treatment with nutrient removal (total nitrogen <1.0mg/l and total phosphorus < 0.1mg/l) before discharge or re-use. Otherwise sewerage should be piped out of the catchment to other treatment plants. Industrial chemicals must be very strictly retained and any wastes contained and taken off site.

South Forrestdale

Action 2. *"Investigate, in consultation with DEC, the acceptability of industrial development within the identified TEC buffer affecting the northern portion of the site."*

Comment; “Threatened Ecological Communities are naturally occurring assemblages of plants and animals listed by CALM as being **threatened with extinction** by human activity, or in danger of being destroyed or significantly modified by development and other pressures from people.” (English and Blyth 1997, 1999) (Bush Forever Vol 2, p 475) (our emphasis). Buffers are used for protection and we would hope that we as a community are not prepared to sacrifice the future of sensitive areas for the sake of industrial development which could be located elsewhere.

There is no recognition that Forrestdale Lake is a Ramsar Wetland, a wetland of international significance subject to international (JAMBA and CANBA) treaties.

Action 1. “Development in this area will require careful consideration and minimisation of potential polluted water flows into Forrestdale Lake and the Peel Harvey catchment. Drainage may need to be installed and directed to interception or treatment wetlands prior to discharge and development would require application of Water Sensitive Urban Design principles including peak flow reduction and adequate nutrient reduction.”

This understates the importance of protecting the Lake and its surrounds. We strongly object to industrial development adjacent to, nearby or in the catchment of the Lake. Nutrient and other contamination of the Lake area by stormwater drains is already a problem and this should not be aggravated by industrial or urban or other closer development. To the south of the Lake the land is very flat and movement of stormwater may be variable in direction of flow depending on rainfall.

Action 3 “Undertake an Acid Sulphate Soils investigations and prepare an ASS Management Plan where moderate to high ASS Study risk levels are detected.”

In regards to Actions 1 and 3 we note that the development of acid sulphate soils resulting from possible drainage necessary for industrial development would present great problems for future infrastructure and acidification of the ground water. Again we state that prevention of ASS problems is called for and this means that the landscape should not be disturbed.

For all the above reasons we strongly object to industrial land use in South Forrestdale and recommend that this proposal be deleted.

North East Baldvis

To the west of the Kwinana Freeway in this proposed development area are Bullrush Swamp, then going south, Bush Forever site 349, Leda Swamp; south of that Bush Forever site 356, Lake Coolgonup and south again Rockingham Lakes Regional Park. We recognise that the ILS states that “*Impacts to Bush Forever Sites and wetlands should be avoided.*” (page 44). However we also note that the ILS states on the same page (page 44) that “*Western edge of subject site and along Millar Road, west of Kwinana Freeway, overlaps Bush Forever sites **which can be managed.***” This contradicts the earlier statement and what exactly does this mean? We suggest the latter statement discounts the importance of properly conserving the Bush Forever site and this is unacceptable.

We strongly recommend that the proposed industrial area to the west of the Freeway be deleted from the proposal as it is an incompatible land use adjacent to conservation areas especially the wetlands. The critically important linkages would be lost and groundwater quality would be threatened.

Greenlands Road

“the whole area is a seasonally waterlogged palusplain multiple-use geomorphic wetland. A conservation category dampland is located within the centre of the site. Development is constrained within the conservation dampland and its buffer area (100m)” page 48.

Palusplains are a type of wetland, being flat landscapes with groundwater close to the surface. During sustained rainfall periods or heavy rain storms water will not drain away readily and thus water lies on the

ground. Channel drainage of large flat palusplains is inherently very slow. Thus these areas are inherently unsuitable for industrial or urban developments and have been left out of earlier plans for Greater Perth for this reason.

This area fails the test of land capability and land suitability. Drainage of the landscape would destroy surrounding wetlands, be extremely expensive, and the area will be prone to flooding. With climate change it is predicted that there will be more extreme weather events - as we experienced this month in Perth.