

8 December, 2009.

The Secretary
WAPC
Albert Facey House
469 Wellington Street
PERTH WA 6000

**Section 57 Amendment (Minor): Metropolitan Region Scheme Proposed Amendment
1177/57**

Ranford Structure Plan Precinct

**Submission by: Urban Bushland Council WA Inc.
PO Box 326 West Perth WA 6872.**

ubc@iinet.net.au Tel 9420 7207

Contact person: Margaret Owen, Secretary

Hearing: We wish to appear at a hearing

Submission

1. The Urban Bushland Council WA strongly objects to Crown Reserve C 34077 lot 500 and C 34077 lot 501 being rezoned to 'Urban deferred'. It should all remain Parks and Recreation for the protection of native vegetation and fauna. The Crown Reserve functions as a conservation park and has a sign saying Shepherd Court Reserve. We question the reason for rezoning a Crown reserve with regionally significant vegetation in very good condition, the clearing of which would be at variance with the clearing regulations under the Environmental Protection Act.

2. We object to this proposal being a stand alone minor MRS Amendment rather than a major MRS amendment. This suggests a process by which the proponent, the City of Armadale, seeks to avoid public scrutiny by the Parliament and also seeks to avoid thorough environmental assessment by the EPA by being a case isolated from its landscape and planning context. The EPA does not have the resources to do formal assessments on every isolated case in minor amendments.

It is claimed that the 'ongoing urbanisation of the subject locality is well known within the community,' this being one reason that the amendment is recommended to be processed as a minor amendment, but from our experience the community wants its bushland and wetlands protected from development.

3. The zoning "Parks and Recreation" is in the City of Armadale District Zoning Scheme No 4 and this should remain as such.

4. We note the advice from the EPA that the environmental issues are;

- Remnant vegetation and fauna
- Noise, odour and buffers between incompatible land uses
- Management of water quality and quantity.

5. Remnant vegetation and fauna

The UBC visited this reserve and its qualities are evident. It is a beautiful area of regionally significant bushland in very good condition. This area of the Swan Coastal Plain is outstanding in its species richness and we note that there is no such survey information available for this site.

We understand that a field investigation of DRF and Priority Species has been undertaken. We noted *Blancoa canescens* which is categorised as ‘Significant flora’ with a geographic variation which is ‘population disjunct from their known geographic range’. In addition this species is considered to be ‘poorly reserved’. (Bush Forever Vol 2, table 13)

Eremaea asterocarpa, also present is listed as priority 1; that is ‘poorly known taxa’, and is ‘considered to be poorly reserved’, has ‘significant populations’ and is ‘endemic to the Swan Coastal Plain’. (ibid)

The classification of the Crown Reserve is ‘Environmentally Sensitive Area.’ Thus it is not subject to Exemptions under the clearing regulations.

Banksia and other proteaceous plants provide food for Carnabys' Cockatoos. The decline of cockatoo numbers is associated with land clearance in the wheat-belt and on the Swan Coastal Plain. While clearing in the wheat-belt has declined since the huge amount of clearing in the 1930s, clearing on the Swan Coastal Plain has accelerated due to development pressures.

The bushland provides habitat for small resident bush birds, reptiles, amphibians and invertebrates. Fungi also are a vital part of the system of this bushland. In addition the bushland acts as an ecological corridor between bushland areas and is part of a regionally significant fragmented bushland/wetland linkage (Bush forever Vol 2, p 261)

The EPA’s advice and recommendations are that if DRF and Priority Species are identified, these species are to be protected pursuant to the provisions of the *Wildlife Conservation Act 1950*.

It is highly likely that Quenda, a significant mammal species is present.

The vegetation complex is Southern River within Bassendean Dunes/Pinjarra Plain. The Southern River Complex had only 10% proposed for protection in Bush Forever (2000) based on 1997 data. Under the Biodiversity Planning Guidelines (WALGA June 2004), Local Authorities are expected to retain at least 30% of each complex where this area still remains. Only 17% remained at the time of Bush Forever publication in 2000. This percentage has now reduced and within Bush Forever there is only 3219 hectares of Southern River Complex left which is 6.35% of the total native vegetation. (DPI advice from the Dept of Agriculture, 2007 mapping) Further losses are unacceptable. The updated data for percentages of each complex remaining are pertinent to consideration of this site and they should have been quoted in the Amendment.

As stated in Bush Forever volume 1 “There will be a general presumption against clearing bushland containing threatened ecological communities or representation of vegetation complexes of which less than 10% currently remains on the Swan Coastal Plain portion of the PMR (generally involving vegetation complexes of the eastern side of the SCP)”.

We read the statement in the Amendment Report under ‘**6 Sustainability appraisal**’, that “extensive areas of P and R already exist in and around Piara Waters/Harrisdale, ensuring recreation and conservation requirements are met as urbanization of the area proceeds.” This is no argument for proposing a rezoning and later clearing of bushland which has been almost completely destroyed through urbanisation.

It is very important then that this reserve be protected from future development, its zoning kept at P and R, and that it can continue as a reserve for the conservation of native bushland.

Acid Sulphate Soils.

In regards to the other lots the Urban Bushland Council is very concerned with the implications of building on acid sulphate soils and the effect on ground water. The Water Corporation has advised that ASS are present in this precinct. The area of the proposed rezoning is low lying with the potential for acid and toxic levels of pollutants such as arsenic, iron, aluminium being released and then washed into the groundwater and wetlands. Once acid conditions form it is virtually impossible to reverse the situation. There are already a number of acidified sites on the Swan Coastal Plain and it makes no sense to provide more. Further we do not have any confidence that the City of Armadale and the developers and landowners will have the knowledge, resources or skill to avoid adverse effects of ASS on the natural and built environment. These areas are simply not suitable for urbanisation and they need to maintain high groundwater levels and seasonal flooding events to avoid acidification.

The Urban Bushland Council objects very strongly to rezoning and development of any type on these ASS areas.

Balannup Lake, a wetland of ‘special note’ is directly across Ranford Road to the north east

Hearing

The Urban Bushland Council wishes to attend a hearing and thanks the WAPC for the opportunity.

Attending would be Mary Gray, president, 9271 5707;

Margaret Owen, secretary, 93811287 (unavailable from 19th January, 2010 to 5th February 2010)

and we would like a public hearing.

Yours faithfully

C. Mary Gray
President

