

Section 57 Amendment (Minor)
Form 57
MRS Amendments 1300/57; 1301/57; 1302/57

1300/57 - Maddington Kenwick Strategic Employment Area - Welshpool Road East Industrial Precinct
1301/57 - Maddington Kenwick Strategic Employment Area Precinct 2
1302/57 - Maddington Kenwick Strategic Employment Area Precincts 3A and 3B

SUBMISSION NUMBER

Secretary
Western Australian Planning Commission
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The proposed changes to land zoning and land use from the current rural to to proposed industrial in these Amendments are expected to have major adverse impacts on the Greater Brixton St Wetlands (Bush Forever Site 387, indicated by the colloquial name of “Brixton St Swamps” on the plans for the Amendments) and Yule Brook.

This issue has been ignored so far by the WAPC, EPA and City of Gosnells because a detailed environmental impact assessment of the proposals on BFS 387 (that could have informed the protection of this very important conservation area by sensible planning measures) has not been carried out. We are very concerned about this obvious fault in the approvals process and suggest that a number of important changes are made to the Amendments before any industrial re-zoning in the area.

We consider that the total lack of environmental impact assessment of the proposed re-zoning on BFS 387 prior to the issue of these proposals is most irregular. Given what we see are obvious potential adverse impacts of the current scheme:

- * The acceptability of the industrial rezoning of all the land that encircles the BFS 387;
- * The potential impacts of the proposals on BFS 387 (arguably the most important natural area remaining on the Swan Coastal Plain) and Yule Brook ; and
- * The detailed strategies that may be necessary to address impacts were never considered or discussed in any of the planning documents or the EPA Reports related to these Amendments.
- * We realise that most of the area mapped as BFS387 in the Bush Forever (2000) report is excluded from the re-zoning. [However we note with great concern that some areas that are mapped in BFS 387 in the Bush Forever report in Wattle Grove are indicated as industrial in the current City of Gosnells structure plan!].
- * The main point we wish to make is that these Amendments and the latest City of Gosnells (August 2014) Structure Plan for the MKSEA have been presented as if all the authorities involved consider the BFS 387 as a small, hermetically sealed island with no links whatsoever to anything that will be happening outside this island. This kind of thinking is clearly flawed in an ecological sense and we expect a much more informed and scientific approach to be taken with regard to the conservation of the sensitive BFS 387 wetlands and Yule Brook (which is a vital, but currently much abused, artery in the ecosystems of the

area).

- * The flaws in the current form of the Amendments (reflected in the current City of Gosnells Indicative Local Structure Plan for this area) fail to safeguard the numerous Federally-listed and the State-listed conservation values of BFS 387, the regionally significant values of the eastern side of the Swan Coastal Plain in this reserve, and they fail to effectively restore the connections between Yule Brook and the BFS 387. This needs to be corrected to support the natural functions and sustainability of the wetland ecosystems in this area that can help make BFS 387 more resilient and sustainable in the face of the impacts from the MKSEA and from climate change. Simply leaving the BFS 387 out of the proposed development area (whilst allowing industrial development right up to the borders of these blocks) and ignoring even basic measures to avoid, reduce or manage impacts is negligent.

The planning and approvals process for the three Amendments has, to date, assessed the rural lands surrounding BFS 387 in detail but it has totally failed to do an environmental impact assessment of the proposed re-zoning and development on BFS 387 itself in Kenwick (or of the Kalamunda Shire land that includes parts of BFS 387 and Yule Brook). We believe that the industrial development that is currently proposed to encircle BFS 387 will have major impacts on this important conservation reserve and that the proposed Amendments have been drawn up with no regard for these impacts.

Some of the obvious potential impacts are :

1. The increased de-watering of the shallow aquifers that support the EPBC Act listed Threatened Flora and Threatened Ecological Communities in BFS 387, in the other MKSEA wetlands and in wetlands adjacent to Yule Brook. These are groundwater dependent ecosystems. The hydrological studies conducted by Endemic for the MKSEA collected some useful information about water quality but they failed to study water quantity issues to the extent required to understand the complex way that essential water is supplied (from many sources) to the biota of the BFS 387 and how to fix up the de-watering problem. With this information gap still present, the current proposed District Water Management Strategy for the MKSEA did little or nothing to improve the existing de-watering of the area by roadside drains or to address the increased de-watering that will be required to accommodate industrial developments. It just proposed to continue the existing regime and made this point in a sentence which could almost be considered as an oxymoron: *“Given the local, state and national importance of the wetland ecosystems this DWMS focuses on the maintenance of the hydrological regimes across the subject land”*.
2. The *“Multiple Use Corridor”* proposed in the DWMS to be located east of BFS 387 will (after major rainfall events) carry run off, accumulated nutrients and toxic pollutants, weed seeds and potential pathogens (e.g. dieback) from all of Precinct 2 of the MKSEA into a tributary of Yule Brook that runs through the UWA land in BFS 387; and will be a major threat to this most valuable area of the BFS 387. This is not a good plan. It is unacceptable, and will result in nutrient enrichment and degradation of the groundwater dependent ecosystems.
3. The current re-zoning of ALL the land that encircles the BFS 387 precludes the reservation of any ecologically legitimate buffer zones to protect the Conservation Category Wetlands of the BFS 387 and values listed under the EPBC Act in BFS 387. There will be very busy industrial roads immediately adjacent to these Environmentally Sensitive Areas on all sides of the BFS 387. Such roads cannot be called buffer zones. Buffer zones are, by definition, zones that absorb impacts and thus protect the inner core of a reserve that harbours conservation values. Instead, the roads in the MKSEA will be the sources of many impacts on the BFS 387 as shown below. ALL of the various small industrial lots shown in the latest City of Gosnells Structure Plan fronting Brook Rd (on both sides of this road), Bickley Rd, the

current alignment of Boundary Rd (on both sides of this road) and the north-west side of Brentwood Rd as shown in the this structure plan, should be buffer zones for BFS 387 or floodplain reserves for Yule Brook.

All of these blocks should be removed from the various MRS Amendments that cover them: it would very bad planning to re-zone them to industrial now as proposed in these Amendments as they would then be impossible to reserve later as parks and recreation areas.

4. The MRS Amendment rezoning proposals (which propose to re-zone all of Yule Brook from Welshpool Rd to Roe Hwy to industrial) allow the City of Gosnells Structure Plan to reinforce the fragmentation of important bush and wetlands by increasing the separation of Yule Brook from BFS 387 via the development of intervening industrial lots along Brook Rd. The DWMS for Yule Brook (and the current City of Gosnells Structure Plan) proposed to retain a maximum of only 50m on either side of Yule Brook as stream reserve (despite Water Corporation recommendations to retain all of the existing 100 year floodplain which is up to about 250 m wide).

Levee bank and fill

The DWMS proposes levee bank construction of both sides of Yule Brook and imported fill to build up the current floodplain by as much as 1.2 m on the Brook Rd side of Yule Brook. This should not be condoned.

Firstly, such filling constitutes destruction of a wetland.

Secondly, the wetland to be filled is a natural hydrological link between Yule Brook and a very important part of BFS 387 (the UWA Reserve) which is currently deprived of some of its ecological water requirements and requires remediation of the Yule Brook (not further destruction) to sustain very important values in a drying climate.

The proposed filling of the 100 year floodplain of the Yule Brook on the Brook Rd side and subsequent developing of the filled area as an industrial site, cements the hydrological separation between Yule Brook and BFS 387.

The current DWMS and the MRS Amendments which currently propose the re-zoning of all of Yule Brook to industrial are the antithesis of water-sensitive design and must be modified to allow the floodplain and natural hydrology to be restored here. **This can only be done if all the area between Yule Brook and BFS 387 is excluded from the re-zoning to industrial in these Amendments.**

5. Significant Fauna impacts

There will be greatly increased road-kill of native fauna (EPBC-listed Black Cockatoos, Quenda, reptiles etc) by the proposed large influx of industrial vehicle traffic into the MKSEA. The Black Cockatoo survey conducted by 360 Environmental for the MKSEA in 2012 mapped the considerable (roosting, foraging and nesting) habitats and estimated that significant populations of Red-Tailed Black Cockatoos and Carnabys Cockatoos used Precincts 2, 3A and 3B. However the scope of this survey (like all other environmental surveys conducted for the City of Gosnells towards these Amendments) ignored the much larger area of Black Cockatoo habitat (mainly foraging habitat) within BFS 387 itself.

The limited general fauna survey of MKSEA by Cardno was also totally insufficient to assess occurrence, potential threats, and the conservation of any other native fauna that may inhabit they MKSEA and BFS 387 (including Threatened Species of Native Bees, for which there are historical records in BFS 387). We consider that to retain and support the current Black Cockatoo use of the area (after the proposed MKSEA industrial developments go ahead) will be difficult. It would be advisable to retain as many as possible of the Marri and other roosting habitat trees currently present in Precincts 1, 2, 3A and 3B and to replant some of the proposed buffer zones with plants utilised by Black Cockatoos.

Vehicle free zone needed

More importantly, the creation of a substantially-sized, **vehicle-free zone** that would preferably encompass all of Yule Brook (between Welshpool Rd and Roe Hwy and its 100 year floodplain on the Brook Rd side) all of BFS 387 and a suitable buffer zone all around BFS 387, would prevent road kills and encourage continued foraging by Black Cockatoos in the area. This traffic free zone would separate the traffic from Precinct 3A and 3B from accessing Precinct 2 and would require the closure of most of Brook Rd. It would require the closure of most of Brook Rd and the portion of Grove Rd within the Yule Brook floodplain (including the crossing of Yule Brook here) to all traffic. All of the above measures would probably not be enough to promote the continuation of Black Cockatoo nesting recorded by 360 Environmental in Precinct 3.

6. Increased frequency of fire in BFS 387 due to arson, careless behaviour by drivers and accidents around the industrial precincts and increased pressure for fuel control burns in the adjoining BFS 387. **These vegetated wetland areas should never be burnt at all.**
7. An increase in feral animal populations in the area due to industrial development and the associated increase in food refuse and the new habitats that become available to feral species such as mice, rats, cats and foxes in industrial estates.
8. The heat island effect on BFS 387 of the large areas of additional roads and hard, built surfaces in the proposed industrial areas encircling the BFS 387.
9. Increased pollutants and increased chances of toxic spills in the industrial area (including heavy metals, oils, asbestos, dust, other toxic chemicals such as acids etc).

CONCLUSION

This is the last chance, before the MRS Amendments proceed, to identify and quantify the impacts and to design many of the fundamental solutions for them **before the rural lands that completely surround BFS 387 (and include all of Yule Brook between Welshpool Rd and Bickley Rd) are re-zoned from a rural area** (that still supports many ecological functions) into a highly-modified industrial estate called the Maddington-Kenwick Strategic Employment Area (MKSEA).

Buffer zones and ecological linkages are needed

It is not acceptable to ignore the problem of the impacts on BFS 387, - as the the current form of the Amendments does, - and defer all the problems for the City of Gosnells to deal with (via structure plans and management plans) after the Amendments are passed. This is particularly clear with regard to the failure of the current Amendments to reserve buffer zones around BFS387 and the adequacy of buffers and ecological linkage areas adjacent to Yule Brook.

The Amendments as currently proposed simply rezone the whole area from rural to industrial. However it is a basic and important ecological principle that buffers zones are required to protect conservation values (such as Threatened Flora and Fauna Species, Conservation Category Wetlands and other waterways, and Threatened Ecological Communities) from the impacts of industrial land uses. This important issue has been largely ignored in the Amendments and in the current City of Gosnells Structure Plan. Once the whole area that is called the MKSEA - and that includes many areas that should be reserved as buffer zones around important conservation blocks - are rezoned from rural to industrial, it will be impossible, on economic and other grounds, to remedy this basic environmental planning mistake via local structure plans etc.

Environmental review by EPA required

Therefore we oppose the current MRS Amendments in their current form and ask that environmental studies (that have so far been overlooked in a very irregular manner) to identify, quantify and map the environmental

values of BFS 387, and the potential impacts of the proposed changes inherent in the MKSEA on BFS 387, are completed and reviewed by the EPA.

It is only through the provision of this absolutely necessary data that ecologically-sound solutions to protect BFS 387 (that are so conspicuously absent in the current structure planning and DWMS) can be designed.

Thus we strongly recommend that, before any further consideration, the WAPC refers these three Amendments back to the EPA for further studies and review and modification of plans as above and with inclusion of legally binding buffer zones around the Bush Forever sites and Yule Brook.

Vice President

Urban Bushland Council WA Inc.

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