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### **Submission on Structure Plan: Lots 55 and 56 Cottonwood Crescent Dianella**

The Urban Bushland Council WA Inc. makes the following comments on the Structure Plan. We strongly recommend that it be revised to address the flaws as below.

#### **1. Banksia Woodlands of the Swan Coastal Plain TEC**

The federal Minister for Environment; Energy, the Hon Josh Frydenberg listed (effective 16 September 2016) the Banksia Woodlands of the Swan Coastal Plain as a Threatened Ecological Community under the Environmental Protection and Biodiversity Conservation (EPBC) Act at the level of endangered. The 1.26ha Banksia woodland on Lot 56 is in 'excellent' condition (Table A 1.6 in Appendix 1) and thus triggers assessment under the federal EPBC Act. Referral of the Structure Plan to the federal Department of Environment should have been done and now must be done by the proponent.

**Recommendation:** Consideration of the Structure Plan by the City of Stirling be suspended until this referral is made to the federal Department of Environment; Energy by the proponent and federal assessment has been carried out. Notably the Plan proposes to clear all the intact vegetation and this is unacceptable and requires revision so that the Banksia Woodlands ecological community is retained and managed to maintain its values. The revision should be made according to the federal government's 'Approved Conservation Advice' for the Banksia Woodlands TEC listing.

#### **2. DPAW and EPA advice ignored**

We recommend that the Plan be reviewed so that the 1.26ha good quality Banksia woodlands is retained and identified as 'natural POS' – in line with advice by DPAW and the EPA. The advice from DPAW dated 22 July 2016 shown in Appendix B (Environmental Assessment) is that DPAW recommended that the City considers increasing the size of the natural area POS to retain the good condition vegetation. Further that a hard edge road be constructed to separate the natural POS for its protection and fire safety for residents. The good quality vegetation can be clearly seen on air images in the Structure Plan.

**Recommendation:** The areas proposed for POS are on cleared areas of Lots 55 and 56. Thus the layout requires revision so that:

- (1) the 1.26ha of natural Banksia woodland vegetation in excellent condition is retained;
- (2) a hard edged road bordering the 1.26ha natural vegetation is included as recommended by DPAW; and

(3) the Banksia woodland is managed to retain its conservation values and as an asset to the local community.

### **3. Presence of state listed TEC: FCT SCP 20a:**

#### **‘Banksia attenuata woodland over species rich dense shrubland’**

Advice from DPAW as shown in the Plan on page 37, as well as the report from Ecoscape, is that the site (Lot 56) may contain Floristic Community Type (FCT) 20a which is a State listed Threatened Ecological Community (TEC) and that this requires further field spring survey. Similarly the EPA has sought information of the extent of FCT 20a remaining on the Swan Coastal Plain.

A survey for the Friends of Dianella Bushland by botanist C. Tauss indicates that the Banksia woodlands in Lot 56 is TEC SCP 20a and we are advised that the analysis of plot data to confirm this will be completed within the next 2 weeks. This information will be pivotal in confirming that this 1.26ha must be retained as it is both a State ESA as well as a federally listed ‘endangered’ TEC.

Notably earlier assessments of Floristic Community Types in Cottonwood Crescent Bush Forever site 43 were all ‘inferred’ as the detailed plot analyses were not carried out (C. Tauss, botanist *pers. comm.* Dec 2016).

**Recommendation:** We therefore recommend that the City initiates a study to determine the extent of this endangered Floristic Community SCP 20a within the City. Notably the southern-most extent of this community is in the channel 9 bushland. It also exists in the Cottonwood Crescent Bush Forever site 43.

This is a further reason for the patch of Banksia woodland in very good – excellent condition in Lot 56 to be retained. Another definitive flora survey and analysis of plot data cannot be done until next spring.

### **4. Karrakatta Complex Central and South**

The vegetation complex for both Lots 55 and 56 is shown as Karrakatta Complex central and south. It is on the Spearwood Dune system. Table 3 shows that 18% of this complex remains in the Bush Forever area, and only 8% is proposed to be secured for conservation in Bush Forever. (The target is at least 10%). It is noted that this is based on dated 1997-98 data with limited on-ground truthing and is therefore likely an over-estimate of what remains.

The EPA’s interim section 16(e) advice (Appendix C July 2015) shows that only 1.8% of this complex is secured for conservation in the Perth Peel Region. Thus any opportunity to secure additional high quality vegetation of this complex should be carried out in local and state government planning decisions. What is remarkable in Lot 56 is the outstanding quality and condition of the native vegetation remaining and we believe the City has a duty of care to nature and to the community to ensure retention and protection of this irreplaceable patch.

### **5. Misleading and incorrect information diminish description of vegetation value**

**On page 16, the Local Context Plan** states that Lot 56 is covered in ‘*light scrub and some mature trees*’. This is misleading and does not represent the description given by Ecoscape in their report. It should state that it is Banksia woodland in excellent condition as shown on the Ecoscape table and map for the Level 2 flora survey.

**Then on page 20 Part Two: Explanatory Section, ‘2.1 Biodiversity and natural asset areas’,** it states: ‘*Neither report has identified any vegetation worthy of protection, which is characteristic of*

*the site's infill location and the impact of surrounding urban development. The common conclusion is that it is acceptable from an environmental viewpoint, for this land to be developed for urban.'*

The report claims that the 'inferred' FCT of the Banksia woodlands in Lot 56 is FCT 23a which is well reserved and is not regionally significant. As stated in (3) above, this does not accurately reflect the findings and conclusion by Ecoscape which states that further survey and analysis is needed to determine the FCTs in Lot 56 and especially any presence of the TEC FCT SCP 20a. All these statements contribute to a gross understatement of the biodiversity value of the Banksia woodlands which is used to help justify their loss by clearing.

**The Map on page 17** is out of date and does not show that 13 Dianella Drive is now Bush Forever and is owned by the WAPC. The air photo on **page 15 dated October 2016** has incorrect labels for Lot 13 Dianella Drive as it is no longer owned by Mirvac. The air photo is probably not a 2016 air photo as labelled as the buildings at channel 7 were removed and the land cleared last summer. Also the north west tip of Bush Forever site 43 is not shown as Bush Forever as in Bush Forever Volume 1 (*December 2000*).

Although these issues do not involve Lots 55 and 56 directly, the context of the area and its biodiversity importance in Bush Forever should be correctly portrayed and not diminished. The City needs to revise its maps accordingly.

## **6. Matters of National Environmental Significance (MNES)**

There are 3 MNES in the area of the Structure Plan and these should all have been referred by the proponent to the federal government for assessment under the EPBC Act:

(1) Banksia Woodlands endangered ecological community as explained above. The 1.26 ha of Banksia Woodland in excellent condition triggers the requirement for the proponent to refer the proposal for assessment under the EPBC Act.

(2) Habitat for the endangered Carnaby's Cockatoo. The Carnaby's population in the region is declining markedly largely because of continuing clearing patch by patch. Clearing results in a net loss of habitat and therefore should not be permitted. Notably the Structure Plan does not even consider the endangered Black Cockatoos or the site as habitat. The Friends of Dianella Bushland report that Black Cockatoos are seen in the area feeding in the Banksia woodlands. It is well known that all remnants of Banksia woodlands comprise Carnaby's Cockatoo habitat and thus should be retained in all local plans and developments considered by the City of Stirling.

**Recommendation:** We recommend that the good quality Banksia woodlands and other large tree habitat, such as the large Eucalypt trees in Lot 55 along the Cottonwood Crescent roadside, all be retained in a revised Structure Plan.

Notable also is the presence of the Forest Red-tailed Black Cockatoo (federally listed as vulnerable) in the region and retention of the Banksia woodlands and other tall Eucalypts will provide habitat for them too.

(3) Graceful Sun Moth habitat.

The *Lomandra hermaphrodita* which is habitat for the endangered Graceful Sun Moth is present on the site as described in the Plan. While the Sun Moth was not recorded in 4 surveys in March 2010, surveys should be repeated again as we understand that sometimes the Sun Moths do not appear each year.

## **7. Ecological linkages**

There is no consideration in the Structure Plan of providing and retaining ecological linkages through both Lots 55 and 56. The tall trees and understorey remnant shrubs around the side of Cottonwood Crescent - especially at the top of the hill on Lot 55 near Lot 56 - provide an existing linkage value which should be retained and enhanced. The Structure Plan shows that all this roadside tree cover will be cleared which will add also to the heat island effect with no tree canopy cover.

Street landscaping should include use of local tree and shrub species. The adjacent 1.26ha patch of Banksia woodlands in Lot 56 is also a significant stepping stone providing added connectivity and should be retained.

**Recommendation:** The City revises the Structure Plan on the basis of the federal 'Approved Conservation Advice' issued with the listing of the Banksia Woodlands TEC. The sections on buffer zones, surrounding environment, landscape context, linkages and connectivity are especially relevant. Indeed this information and advice should have been used in the Structure Plan and now must be considered in a revision.

## **8. Landscape context and layout of housing**

The overall design and layout of small housing blocks on cleared and levelled sites is an old fashioned 'greenfield clearing' approach which denies the natural attributes of the landscape. In contrast, the views would be outstanding from medium density blocks of buildings strategically placed on this naturally sloping landscape with fabulous views to the east – rather than individual large houses on small blocks.

The proposed layout in the Structure Plan is similar to that now evident for the former channel 7 redevelopment. These satisfy earthmovers, limestone miners and builders rather than future residents who could benefit from some natural vegetation, cooler tree canopy and open spaces not hard covered as well as spectacular views towards the hills – this being the highest ridge between the coast and the hills. We note that the sale of these tiny blocks at this site is very slow.

The Structure Plan includes the 'cut and fill' approach with all sites being cleared and levelled, with retaining walls installed. Indeed the Plan justifies clearing because of the demand of builders for level sites. This is unacceptable. There is no need to change the shape of the natural landscape to suit earth moving contractors and builders.

**Recommendation:** It is recommended that the City revises the layout of the Structure Plan so that the natural attributes in the above recommendations are all retained and that medium – higher density style blocks (multi property and/or apartments) be considered on the existing sloping landscape taking advantage of the views. Road and pedestrian entry can be opened up direct from Dianella Drive which is a main bus route.

Representatives of the Urban Bushland Council are available to provide further information if requested. We may be contacted via our office by phone 9420 7207, or by email to [ubc@bushlandperth.org.au](mailto:ubc@bushlandperth.org.au)

Yours sincerely

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