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Perth and Peel@ 3.5 million

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Dear Sir/Madam

Submission: *Perth and [Peel@3.5 million](#)*

The Urban Bushland Council presents the following submission with regard to the *Perth and Peel @ 3.5million* project – abbreviated to the *Draft PP3.5m* elsewhere in these pages.

The Urban Bushland Council (UBC) has been in existence for over two decades. It is a peak community conservation body with 71 member groups. The Council lobbies for the protection and appropriate environmental management of native vegetation in and around Perth and other urban and regional centres in Western Australia. The UBC has also been involved in practical research projects involving urban bushland and educational initiatives as well.

Preliminary General Comments

The Urban Bushland Council has a particular interest in conserving the Perth region's natural heritage. Being a relatively young city, in a State that has experienced European settlement for less than 200 years, the Perth region still retains some of its native vegetation and associated fauna. The flora and fauna of the Perth region is outstandingly rare, beautiful and diverse and it could be argued that the natural attributes of the region were better appreciated by our pioneers and earlier generations than they are today.

It is regrettable that the general admiration of what in earlier times might have been described as "the countryside" and its landscapes, trees, wildflowers and birds – which is very evident in accounts of life in the previous two centuries – did not really manifest itself in the establishment of nature reserves on any major scale – the populace probably assuming this resource of natural beauty and recreation was quite vast and unthreatened. It is true that agricultural development wiped out much native vegetation and habitat on land that was considered fertile – such as land on the eastern side of the Coastal Plain and in the Swan Valley but private landholders were subject to no real environmental restrictions and ecological knowledge at the time was somewhat threadbare.

However, with the pace of urban development after World War II, Perth has expanded steadily – and sometimes quite rapidly – to become a city with an exceedingly large footprint relative to the size of the population. The impact on native vegetation and habitat on the Swan Coastal Plain portion of the Perth Metropolitan Region was substantial and increasing. The System 6 Report of the early 1980's was one of the first systematic attempts to identify potential nature reserves in the Perth Metropolitan Area. Many potential nature reserves were indeed identified around the Perth Metropolitan Region but they were certainly not all implemented and many areas of high conservation value were omitted.

It was community dissatisfaction with the extent of clearing of native vegetation around Perth and the destruction of our natural heritage that led to the establishment of the Urban Bushland Council in the early 1990's. Many years of lobbying by the Conservation Council, the UBC and other community groups led to the Perth's Bushplan initiative, which subsequently became Bush Forever – officially released and adopted as Bush Forever in the year 2000.

It is worthwhile rehearsing some of this history because in the *Perth and Peel 3.5 Million* document and the associated four Draft Planning Framework documents the Planning Commission has shown scant regard for the views of the great many Perth citizens who are of the view that it is eminently reasonable and desirable that a substantial, representative and environmentally sustainable portion of the original extent of the native vegetation and habitat that existed on the Swan Coastal Plain at the time of European settlement - only 176 years ago - be set aside for conservation purposes in perpetuity.

In the Minister's Forward to the *Draft PP3.5m*, the Hon John Day concedes that Perth's anticipated population growth over the next 35-40 years will place “increased - and unsustainable - pressure on our natural environment, our economic well-being and our highly-valued way of life” (p.2). In the “Message from the Chairman,” Mr Eric Lumsden refers to the need to identify “where areas of significant regional environmental value should be avoided and protected” (p.3). These statements would appear to be setting the tone for the community to be presented with a clear exposition of how the proposed expansion of Perth might be expected to impact on our remaining native vegetation and habitat. Regrettably, this is not the case and this is unacceptable.

It is noteworthy that the Chairman of the WAPC refers to “areas of significant regional environmental value.” The designation “regionally significant” has conventionally been seen as having a lower environmental value threshold than the designation “nationally significant”. In the case of the Swan Coastal Plain, the WA government botanists who devised the Bush Forever plan classed the **regionally significant** vegetation as also being **nationally significant** because of its uniqueness, its species richness, the extent to which it has already been cleared, its provision of habitat for endangered species, and its vulnerability to threatening processes.

Disconnected relation to Strategic Assessment

The *Strategic Assessment of the Perth and Peel Regions* (SAPPR) which concentrates on “Matters of National Environmental Significance” (MNES) is cited as having “played a major role” (p.54) in the production of the *Draft Sub-Regional Planning Frameworks*. This reference to an interaction between the *Draft PP3.5m* project and the SAPPR is mysterious as the latter is not even due for completion until 2016 (p.54).

The UBC submits that the *Strategic Assessment* process should have been completed first, and put out for comment before compiling and releasing the *Draft PP3.5m*. Failure to do this is we believe a fundamental flaw in the process and must be corrected. We simply cannot determine what areas are to be cleared and what MNES will be affected.

Uncertain future for biodiversity

In addition however, the UBC regards virtually all the remaining native vegetation on the Swan Coastal Plain as being “nationally significant” and we are very unlikely to be convinced otherwise regardless of the determinations of the *Strategic Assessment*. There are considerable grounds for suspicion that the driving force behind this *Strategic Assessment* is the object of “providing certainty for developers and industry” rather than protection of our unique and rich natural heritage.

The EPBC Act has not thus far provided adequate protection for the many native species and communities requiring the maintenance of viable habitat to survive safely into the future on the Swan Coastal Plain. So there is not much reason for optimism that it will in the future. It is an on-going

disgrace that so-called environmental protection legislation actually functions to protect development in the Perth region – largely due to the application of offsetting processes which the UBC regards as being fraudulent and environmentally ruinous. Habitat loss is the fundamental problem and offsetting always results in a net loss of habitat. In particular the extremely rich and complex ecosystems in Banksia woodlands simply cannot be replanted and replaced. Offsets are not a justification for clearing.

Community engagement flaw

The *Draft PP3.5m* purports to comprise a set of documents that gives some priority to community consultation. In the core document the Chairman of the WAPC states that *“this overarching document has been developed to help engage the community in open discussion on the future of Perth and Peel”* (p.3). The Urban Bushland Council, however, is exceedingly concerned to find that there is no mapping in any of the five documents that specifically identifies the existing native vegetation on the Swan Coastal Plain in the Perth and Peel region and no mapping of the prospective impacts of the proposed urban expansion envisaged by the WAPC on that remnant native vegetation.

Existing biodiversity assets not shown

The lack of any means of viewing an up-to-date image or map of “the existing environment” with respect to native vegetation on the Swan Coastal Plain is a shocking omission in a supposedly consultative suite of documents. This is totally unacceptable and maps of current vegetation must be made available before public comment. It is impossible to give useful comments without this baseline information which must include also sites of MNES. The UBC is well aware that there is considerable disquiet in the community about the amount of bushland clearing that has been occurring in and around Perth and that a great many people see it as the destruction of a vital aspect of the city’s heritage and character.

Clearing hidden

Bushland clearing around Perth always arouses concern in the community and fact that does not necessarily receive extensive coverage in our mainstream media outlets does not mean there are not a great many people who are very unhappy with the way Perth’s natural environmental attributes are being eroded for development purposes. So it is remarkable that such a contentious issue should not be canvassed properly in draft planning documents like the *Draft PP3.5m* suite.

Where are the maps or images specifically showing the existing native vegetation on the Swan Coastal Plain so that the community can see what the WA Government and WA Planning Commission envisage being cleared?

Where are the overlays that could have been provided so that the community could clearly see what proposed new urban developments will entail in terms of the loss of our natural heritage?

Satellite image essential

It is extraordinary that in these times where sophisticated satellite imagery is readily available the *Draft PP3.5m* does not even include an up-to-date satellite image of the city and its context in the Swan Coastal Plain. There could and should have been at least one A3 image of this kind in the document(s). This is an appalling omission in itself but it also denies the community the opportunity to gain a better idea of what the kind of urban expansion envisaged by the WAPC would mean for our remaining native vegetation and our biodiverse natural environment.

Extensive clearing proposed but not stated

It is the Urban Bushland Council’s understanding that the WAPC actually envisages the clearing of very large areas of up to 18,000-20,000 ha of native vegetation for Perth’s future expansion. But this is not clearly set out in the *Draft PP3.5m* documents and it is an outrageous denial of the community’s

right to be properly informed - particularly when their views on such important and contentious matters are allegedly being sought.

It is totally unacceptable that a suite of documents purporting to seek community input should avoid clearly setting forth the facts about such an important issue as the protection of native vegetation and areas proposed for clearing on the Swan Coastal Plain in the Perth and Peel region. Recent satellite images or proper mapping of the existing environment with respect to native vegetation – and not just that which has been included in Bush Forever or which has been given some kind of reserve status - could and should have been a prominent component of the documents put out for public comment in the PP3.5m process.

The following comments relate to the overarching *Draft PP3.5m* document

INTRODUCTION (p.7)

The very title of the *Draft PP3.5m* process involves projections and estimates that are questionable. Only a few years ago Perth was experiencing rapid population growth largely due to a booming resources industry. However, in more recent years the experience of the resources sector has been somewhat less buoyant and it is our understanding population growth has declined accordingly. WA Governments are very reluctant to publically concede that the state has a “boom and bust” economy but history would suggest this pattern is not unfamiliar owing to its vulnerability to market prices for mineral resources and agricultural produce.

Tourism overlooked

Governments have an understandable tendency to “talk up” future prospects for the state but WA’s projected economic growth is really tied to important factors over which they can exercise no control. Western Australia is no longer experiencing the economic boom derived from mining resources as it was for an extended period. Growth prospects at least are a matter of conjecture and may well be more subdued than is projected in the *Draft PP3.5m* documents. Tourism to see our unique natural areas could produce much more economic growth *without resident population growth* but this is not even addressed in the documents. This should be addressed but our urban bushland must be retained, protected, properly managed and promoted to enable more visitors to enjoy it.

Water supply not adequately addressed

Another essential consideration for the future “carrying capacity” of Perth is the availability of potable water. Major and irreparable damage has already been done to wetlands associated with the Gngangara Mound system through excessive and over-limit groundwater extraction, and there are on-going adverse impacts still occurring. Our climate has and will continue to change to a lower rainfall regime and supply from catchment dams is now negligible. Increased supply without much greater restrictions will have to rely on more expensive desalination plants. Groundwater extraction and treatment is also expensive. Drawing water from very deep aquifers does not necessarily alleviate this problem.

Where is the technical advice from the Department of Water concerning future water supply for the predicted doubling of demand?

Due to excessive and uncontrolled abstraction compounded by declining rainfall, the superficial aquifer is falling in the region and this is a major threat to our bushland and wetlands. This key issue is not adequately addressed on p58-59. Use of the superficial groundwater by all sectors should command a volumetric charge and per capita use should be reduced substantially.

The Urban Bushland Council is not opposed to economic growth or population growth which is environmentally sustainable. But the manner in which Perth’s physical growth has proceeded, and is

proceeding, is not environmentally sustainable. Urban sprawl is chewing up irreplaceable natural heritage and it must be contained. The economic cost of providing services and infrastructure appear to be the Government's primary concern regarding urban sprawl but ours is the on-going impact on our remaining native vegetation and habitat – and hence our flora and fauna.

Sustainable development

In the Introduction (p7-8) it is claimed that:

The draft frameworks provide guidance on where sustainable development should occur over the next 35 to 40 years to ensure the impact of urban sprawl on areas of environmental significance is minimised; to protect our heritage; and importantly, to maximise the benefits of available land and existing infrastructure (p.8).

However, in the ensuing document(s) there is no clear exposition of the matter of how proposed developments will impact on native vegetation – though they can be roughly determined by referring to other sources of information. Our protest is that if the *Draft PP3.5m* process purports to be leading to the settlement of issues relating to the identification of suitable land for further urban development, then why are these issues – particularly those relating to native vegetation - not fully canvassed in the document(s)? **If the identification of such land has been informed by the SAPPR, then why were the two projects not released for public comment simultaneously? In fact it makes far more sense to deal with the environmental assessment issues first - with ample opportunities for public input and comment on draft documents.**

It looks very much as though the WA Government and the Planning Commission want to bed down their preferred options without canvassing the environmental issues properly in the *PP3.5m* consultation process. The UBC is very wary of the release of planning documents that do not tell the whole story and which are designed to constitute some kind of authorisation for planning and development into the future. Referring to the *draft frameworks* it is stated in the Introduction that:

They provide an unprecedented level of certainty about the amount of land available and the best areas identified for urban expansion, including residential, commercial and industrial development (p.8).

We strongly disagree. This is a very disturbing assertion given that there is no data specifically relating to native vegetation supplied in any of the documents and no proper explanation of the environmental criteria that have been taken into account regarding decisions on land development options. Indeed, the impression is created that these decisions have been finalised and that public comment is simply a generous opportunity to endorse the WAPC's work.

The status of flora and fauna populations and general environmental conditions can vary over time and locking in large scale development plans well before they are actually due may suit the WA Government, the WAPC and the land developers, engineering firms and miners and others but the status of fauna and flora species can change fairly abruptly owing to such factors as predation, disease, poor reproduction, and competition while such unpredictable large-scale impacts such as droughts can also devastate flora and fauna populations. Many of our flora and fauna species and communities are not well understood and information derived in future studies may shed new light on the need for new conservation priorities.

The unfortunate fact is that is that while development – in the broad sense - has any number of chances, native vegetation and habitat has only one chance. Once it has been cleared and disturbed it is gone forever. The fragility of our natural landscapes in this respect has been demonstrated time and time again, but there are very few cleared sites that can't be "redeveloped."

The UBC submits that **the precautionary principle** should be applied assiduously in all environmental assessments involving the Perth and Peel regions. It is our very strong view that it would be wrong to make absolute decisions regarding conservation provisions in plans covering a 30 to 40 year time frame unless those decisions amounted to a ban on clearing altogether – which the Urban Bushland Council would fully endorse.

Infill increase to 80%

The Urban Bushland Council is in favour of “*higher density residential development*” (p.8) and “*a more compact and connected city*” (p.8). However, many people have enjoyed growing up in the large, shady blocks that Perth has had to offer as the residential norm until recent times. This suburban layout was probably beneficial for the health of growing children in that it provided plenty of outdoor recreational space and the larger blocks allowed for a great many trees to be planted in private gardens throughout the city. A change in modern building design to more compact houses and apartments with much less use of concrete structures especially on the exterior could enable more outdoor ‘green’ space with trees and plants.

The Urban Bushland Council supports infill with higher density but only on the condition that urban expansion is contained sufficiently **to protect existing native vegetation**. The impetus for making Perth a more compact city should be the adequate protection of our natural heritage with ecological connectivity to make a greener and cooler city. Decentralisation and the further development of regional centres where pressures on the natural environment are not so intense is another way to accommodate increased population.

With the proviso that protection of the city’s natural environment (*ie* native vegetation and habitat) – is to be a primary objective and benefit to be derived from higher density residential development, the UBC believes that the target should be **increased to 80% infill**. It would require very careful planning to maintain the quality of life of suburban residents living under such a planning regime but it would not be impossible.

PERTH 2050 –THE NEED FOR CHANGE (p.15)

The Urban Bushland Council strongly agrees with the objective of getting more people out of cars and into public transport but this commitment is lacking in current planning. Enormous new road projects are still being approved and their physical impact on the natural environment is often shocking, let alone the on-going impact of pollution, noise, obstruction, high emissions, and congestion. It has been proven throughout the world that the best way to beat road congestion is **not to build more and bigger roads** – as happens in Perth – but to build better public transport systems. Perth needs to develop public transport systems that are efficient, well run and safe and Greenhouse Gas emissions will be lower also.

There are many laudable objectives set out in the *PP3.5m* document(s). Regrettably, there is not much if any evidence that the planning process has delivered, is delivering, or is likely to deliver the outcomes that fulfil these objectives: It is stated that:

The principles of good urban growth management should be applied to the planning of new areas to reduce any negative impacts on water resources; to avoid the loss of a sense of place; and to protect natural habitats and rural food producing land close to the city.

Massive amounts of clearing of native vegetation is obviously contrary to “protecting our natural habitats”

Sense of place

The Urban Bushland Council welcomes the use of the term “sense of place” as it recognises an element of the consequences of planning that is of major significance to the community but one that is seldom brought to any prominence. The human response to the physical environment in terms of

aesthetics, emotion, memory and familiarity is of major interest to a body such as the UBC as most of our members are not scientists and are not necessarily driven to care about the protection of our natural landscapes for particularly scientific reasons. It is likely that most of our members simply love the native flora and fauna of the region and want to keep it as a significant feature of the urban and near-urban landscape in perpetuity.

Few modern cities even have the opportunity to have such spaces included in their city environment but this is one of the unique features of Perth that we need to keep. The Urban Bushland Council has many members who are not originally from Perth and members from overseas who are passionate advocates for the protection of our flora and fauna. It is our very strong view that bushland is an essential part of Perth's identity and heritage and planners should demonstrate much more commitment to protecting that native vegetation which remains in and around the city.

Ensuring the region's environmental assets are protected (p.17)

"Ensuring the region's environmental assets are protected" (p.17) is a dot point listed among a number of "challenges" (p.15) facing Perth. It should be listed as a serious planning "objective" rather simply a "challenge" as should "reducing car dependency" and "achieving efficient use of water in a drying climate" (p.16). This requires a "whole of government approach." We expect a much more robust commitment to "ensuring the region's environmental assets" than that presented in the *Draft PP3.5m* documents.

Biodiversity hotspot not protected

The UBC welcomes the recognition that "the regions sit within Australia's only global biodiversity hotspot, one of only 34 in the world" (p.17) but deplores the fact that there is almost no expansion on this subject elsewhere here or elsewhere in the *Draft PP3.5m* documents. The Swan Coastal Plain constitutes a very significant portion thereof in terms of biodiversity and endemism. The Australian Government's Department of Environment describes Hotspots as follows:

Biodiversity hotspots are areas that support natural ecosystems that are largely intact and where native species and communities associated with these ecosystems are well represented. They are also areas with a high diversity of locally endemic species, which are not found, or are rarely found, outside the hotspot.

The current, planned, or potential management activities in hotspots place the natural values at risk and it is highly likely that this risk will increase in the absence of active conservation management (Australian Government Department of Environment Website)

Hotspots are globally recognised areas where highly biodiverse ecosystems are a conservation priority because they are under threat. Although the *Draft PP3.5m* documents relate to a hotspot with fragile ecosystems that are under serious threat from human activity, **there is no prioritisation of environmental protection evident in the texts** and it is treated as just another consideration. Even worse, that consideration is minimal. There are repeated statements about protecting significant environmental assets in the documents but there is no real substance to back them up. Mapping showing planned and projected future land uses is clearly anticipating very extensive clearing of native vegetation and habitat but this fact is not rendered in an up-front fashion to give a true picture of the environmental impacts of the WAPC's preferred development options for the average citizen. Once again, where are the maps and overlays and satellite images that would make the information relating to the projected loss of native vegetation and habitat appropriately available to be canvassed? Figure 11 on page 57 entitled "Open Space and State Forest" is certainly not specific to remnant native vegetation.

Under the dot point "Ensuring the region's environmental assets are protected" :

More than 358,057 hectares of land across Perth and Peel is reserved as parks, regional space or State forest under the Metropolitan Region Scheme (p.17).

The juxtaposition of this statement is appalling. Under the dot point “Ensuring the region’s environmental assets are protected” there are two other sub-points. The first is that “the Swan Coastal Plain is under increasing pressure from development,” (p.17). The next, appearing directly above the indented quote above relating to the Metropolitan Region Scheme is the observation that “the regions sit within Australia’s only global diversity hotspot, one of 34 in the world.” In this context, the observation regarding the apparently large amount of land reserved under the MRS as parks, regional open space or State forest is entirely inappropriate. There is any amount of land broadly zoned as park land or regional open space in the MRS that does not consist of or even contain remnant native vegetation. State Forest is not national park and it is potentially open to exceedingly environmentally destructive usage. It is highly misleading to imply that all this land so reserved under the MRS relates directly to the issue of “ensuring the region’s environmental assets are protected.”

This matter of what constitutes “protecting environmental assets” is but one example of a serious problem with the *PP3.5m* documents. We are accustomed to seeing the words “sustainability” and “green” being used to mean just about anything. Sports grounds and public gardens full of exotic trees may be “green” in colour but they have not much to do with protecting our native flora and fauna.

GROWTH PATTERNS – OUR CHOICE

For the protection of our native vegetation, the UBC favours the “Contained City” scenario presented in the document (p.20). The UBC supports an infill target closer to 80% than 47% only if that allows for the preservation of more native vegetation and habitat. The UBC is not convinced the “Connected City” option can be pursued while enabling “the protection of important area (sic) of conservation and agricultural significance” (p.20).

Urban vs Suburban (p.21)

The repeated reference to a “green network” (p.22) throughout the documents is a seriously misleading concept in the context of the more pressing need to protect our native ecosystems and ecological linkages. Including essentially ecologically barren artificial parkland settings in with landscapes that retain native habitats is an unacceptable combination that diminishes ecological values and their extent. **Natural areas need to be separately mapped and discussed.** They are entirely different landscapes and have entirely different ecological values. “Protecting the green network” is substantively about protecting community recreational amenity and not predominantly about protecting Perth’s unique ecosystems at all.

Achieving the Directions 2031 Vision

Basic raw materials (p23)

The UBC is very concerned about the prominence given to “protect areas with basic raw materials for timely extraction” (p.23). There are considerable expanses of native vegetation underlain by such resources and any pre-emptive attempt to secure the future access to these resources - given all the environmental destruction that might entail – is both alarming and unacceptable. These resources can be accessed further afield in less environmentally sensitive sites or can be replaced by substitute materials – e.g. recycled rubble for sand fill.

Bush Forever omission

The UBC supports the proposal to “protect areas with regional conservation and landscape value” (p.23) but struggles to see how this can be achieved given the nature of the *Draft Planning Frameworks*. The subject of land with “regional conservation value” brings us to the subject of Bush

Forever. This major planning initiative that was years in the preparation and which was launched in the year 2000 gets very poor coverage and recognition in the *Draft PP3.5m* documents and that is totally unacceptable and requires revision. Bush Forever is still not completely implemented after 15 years. Bush Forever sites still do not have statutory protection *per se* and some high profile sites are still under threat of totally unacceptable developments while others are not being managed to protect their values. It is an outrageous failure of governance. But where is the recognition and assurance that Bush Forever sites will be protected in the *Draft PP3.5m*?

Figure 6: Perth and Peel – A Spatial Plan (p.25)

Maps do not show impacts

The abovementioned Figure 11 does not show potential impacts on remnant native vegetation and it has a somewhat “cartoonish” quality that is not very illuminating. If the WAPC is expecting endorsement for its preferred future layout for Perth perhaps it should have taken more trouble to highlight and explain the issues raised by their preferred model and provided better imagery and mapping. It is true that the *Draft Sub-regional Planning Frameworks* have somewhat more precise mapping, but we are none the wiser as to the existing environment with respect to native vegetation when viewing these documents.

Offsets are flawed

Bushland currently zoned urban should be set aside for conservation. We have vulnerable fauna that is at risk of losing so much of its original habitat that maintaining viable populations is increasingly difficult. A very large total amount of remnant native vegetation has been cleared in and around Perth in recent years thanks to the environmentally fraudulent process known as “offsetting.” This ecological desertification of whole areas of the city has been facilitated through this scandalously inappropriate practice. We have no confidence in any authority that claims changing the tenure of some land remote from native vegetation cleared for development that has no real ecological connection with the cleared vegetation physically or in composition somehow makes up for its loss. It does not make up for its loss and not only is there an overall net loss of habitat but the district in which the native vegetation is cleared becomes yet another depleted - if not obliterated – habitat resource for species that are already facing many threatening processes.

ECONOMY (p.33)

In the summaries of the requirements of the various sub-regions with respect to employment (p.36.37) there are repeated references to the need for “readily-available” (p.36) land for various purposes – these being industry and commerce, services, retail, trade, education and so on. This reads as land free from impediments to development and this could be interpreted a land free from constraints such as environmental assessment processes. We have very grave concerns that the *Strategic Assessment for the Perth and Peel Regions* may be being framed with a view to providing open slather on large tracts of native vegetation. We hope this is not the case but as the *Strategic Assessment* is not even completed, we are quite in the dark as to its direction and potential recommendations. The UBC wishes to make it very clear that we are strongly opposed to environmental offsetting as a justification for clearing native vegetation.

THE URBAN ENVIRONMENT (p.41)

The UBC is a strong support of increasing urban density for the purpose of reducing urban sprawl and reducing pressures on native vegetation. We are not in favour of urban consolidation if it merely delays the process of the Swan Coastal Plain becoming one large urban expanse.

Under the heading “Sport and Recreation” the following statement appears:

Public open space is crucial to Perth and Peel's liveability and its green network is among the largest in Australia with some 112,000 hectares of public and private land reserved for "Parks and Recreation" reserved in the Metropolitan Region Scheme (p46).

The UBC is supportive of the provision of ample public open space in urban settings and there is probably a greater need for the provision of such areas in higher density residential settings. This would seem contradictory but more people living in close proximity probably need a greater area of accessible open space to accommodate their recreational needs. The use of the term "green network" to describe or include grassed parks and sports grounds is problematic. The term "green" conventionally refers issues pertaining to the environment – and perhaps, more specifically, the natural environment. Sports grounds and grassed parks are good for people but their contribution to the survival of our native ecosystems is minimal.

It is misleading to the point of dishonesty to treat bushland and sports grounds as if they had some common environmental values. This is not the case and these categories must be separated in revised plans.

Transport (p.46)

The UBC strongly supports the development of efficient, accessible and safe public transport systems. We are sick of seeing major new road developments and extensions devastating and fragmenting good quality native vegetation and habitat. They do not solve the problem of traffic congestion in the long term, they are expensive, they waste raw materials, and they encourage more rather than less use of private vehicles. Rail systems are the option of the future, and every opportunity should be taken to examine the feasibility of using rail options as they have the potential to move people – and freight – with considerable efficiency while reducing overall environmental impacts.

Another way of reducing congestion on our roads is to encourage more people to take up cycling and to provide better cycle path networks. Perth has an excellent climate for cycling but it has not yet reached anything like its potential as an alternative to road transport.

ENVIRONMENT AND LANDSCAPES (p.53)

The fact that "Environment and Landscapes" is the last of 8 chapters dealing with planning issues other than "Implementation" is probably an accurate reflection of the *Draft PP3.5m* document's priorities. The UBC would make the point that the natural environment – as opposed to highly modified and essentially man-made landscapes such as park land - should have been given its own chapter in this document. "Regional Open Space" is not necessarily native vegetation or natural landscape and the figures supplied are unhelpful in consideration of such matters.

The UBC welcomes the *Draft PaP3.5m* documents recognition of the fact that:

The Perth and Peel regions are located in one of only 34 global biodiversity hotspots and the only one in Australia. Open landscapes and unique, diverse native flora and fauna, together with popular waterways, beautiful coastline and highly utilised public open spaces gives the regions a distinctive sense of place (p.53).

It is regrettable that the ensuing treatment of "environment and landscapes" in the document gives no cause for confidence that the WA Planning Commission proposes to take appropriate action to address the urgent problem of native habitat loss affecting our flora and fauna on the Swan Coastal Plain in the Perth and Peel regions. There are not enough "protected areas" (p.53) in these regions to ensure the survival of many of our flora and fauna species into the future. It is certainly true "urban

encroachment” (p.53) is impacting on native vegetation that contributes to the international recognition of south western WA’s biodiversity but where is the ban on clearing that is needed to address this problem? Future generations will not be able to reconstruct these ecosystems and their on-going destruction raises very serious questions of intergenerational equity.

The Draft PP3.5m document claims that four sub-regional strategies have been “informed significantly” (p.53) by the Strategic Assessment of the Perth and Peel Regions but the community has no access to this assessment and has not been given any opportunity to comment on them. It is our understanding that it is not even due for release until 2016. So the community is supposed to take it on trust that proposed urban expansion “also protects environmental values” (p.53). It is the very strong view of the Urban Bushland Council that there must be cessation of clearing of native vegetation on the Swan Coastal Plain in the Perth and Peel regions for them to have any chance of retaining their viability in the longer term.

On the matter of the *Strategic Assessment of the Perth and Peel Regions* this is an assessment that looks at “matters of national environmental significance” as perceived by the Commonwealth. For a matter to be of “national significance” it must meet quite a high threshold for rarity and endangerment. This is about taking action at the last minute instead of preventing species and communities coming under stress in the first place. The Urban Bushland Council is not satisfied with many aspects of the *EPBC Act* and has certainly not been satisfied with the way in which it has been administered. It purports to protect our biodiversity but it is administered in such a way that it does nothing of the sort. How are we protecting our biodiversity by continuing to approve the clearing of native vegetation? Australia has a disgusting record of destroying habitats and causing the decline and extinction of flora and fauna species but the process continues. The use of “offsets” has just facilitated more environmental destruction and until governments admit that allowing the net loss of native habitat is ruinous for our flora and fauna this degradation of our ecosystems will continue indefinitely.

Regional Open Space (p.54)

“Regional Open Space” – is not defined in the glossary at the end of the document but as it is treated as being synonymous with the “Green network” (p. 54) which is defined as follows:

The Green network consists of public and private open spaces. The green network included Bush Forever sites, national and regional parks, district and local parks, sports fields, school grounds, community facilities, golf courses, foreshores and beachfront areas connected by streetscapes, trails, cycle paths and pedestrian footpaths (p.70).

This “green network” could just as well be described as “land not covered by bricks, concrete or tarmac.” This is an incredibly broad and inclusive category that has little ecological meaning at all. Providing figures for areas so-defined associated with the various sub-regions is problematic at best and this data has nothing to do with opening to the chapter which is referring to the regions’ significance as part of a “*biodiversity hotspot*.” Where are the figures on the remnant native vegetation in the four sub-regions? How much of that is safely reserved and how much does the PP3.5m process envisage being cleared for proposed future development? This is the data the Urban Bushland Council expects to see and which should be included in the document.

Urban Forests (p.55)

The planting of trees in the suburban landscape is a matter of some interest to the UBC as such trees can create a distinctively Western Australian ambience and they have the capacity to provide some additional habitat for our native birds and other fauna - but only if local species are planted.

There has been a remarkable trend towards the planting of exotic rather than WA native or local native trees in the suburbs of Perth and this is not going to help our native birds and other fauna. Local Government Authorities have shown extraordinary environmental indifference and ignorance in planting exotic trees in huge numbers through Perth. These trees may be “green” in colour and meet the environmental criteria of some town planners but they represent a depressing failure to appreciate our own state’s native trees and a failure to recognise the need to provide additional habitat for native birds and insects. The UBC is very suspicious of terms such as “green” and even “environment” as they are variously used and associated concepts often completely neglect serious issues relating to biodiversity and natural ecology. As they are being planted today, “Urban Forests” are largely an environmental opportunity being wasted and it reflects poorly on Local Government.

Adapting to our Climate Change (p.55)

As the south west of WA becomes hotter and drier, it is possible that our agricultural lands will become less productive. This may affect the WA economy significantly and that cannot be ruled out. It is also likely that our city will become more reliant on recycled water and desalinated water and that the cost of water will rise substantially. Whether such factors might even effect the growth of Perth and Peel is worth consideration.

The UBC is concerned that uncontrolled groundwater extraction is damaging our natural wetlands and that it may place native vegetation under serious stress in times of drought. It is likely that most of our native ecosystems will come under increasing stress from a hotter and drier climate and it is our view that our native flora and fauna species and communities may need additional habitat buffering in the face of this approaching threat. In other words, they will need much more reserved habitat than that which is currently established.

Basic Raw Materials

The UBC is of the very strong view that protection of native vegetation should take precedence over the extraction of basic raw materials. If it is more costly to use recycled materials or substitute materials or materials brought from less environmentally sensitive areas then that is a cost the community should be prepared to pay to protect our native habitats and their flora and fauna for generations to come.

IMPLEMENTATION (P.61)

It is stated that the sub-regional planning frameworks “*do not change the existing zonings and/or reservations of land, or allow for new land use*” (p.61). The Urban Bushland Council can only reiterate its insistence that much more of our native vegetation and habitat on the Swan Coastal Plain in the Perth and Peel regions needs to be reserved to protect our flora and fauna and a distinctive sense of place for future generations. Bush Forever is not fully implemented and receives little attention in the *Draft PP3.5m* documents. It is our strong view that remaining areas of native vegetation occurring in areas zoned Urban or under some other threat of development still need to be protected. We are fully in favour of the objective:

Perth will responsibly manage its ecological footprint and live within its environmental constraints, while improving our connection with and enjoyment of the natural environment (p.65).

As stated earlier, the problem is we cannot see the evidence of this objective being addressed in the *PP3.5m* documents. This is a missed opportunity which could enhance the quality of life and health of citizens as well as visitors.

DRAFT CENTRAL SUB-REGIONAL FRAMEWORK

The relevant comments regarding the draft sub-regional frameworks are largely covered in our general points relating to the overarching *PP3.5m*. They centre on the need for much greater protection for native vegetation and habitat. The UBC submits yet again that the clearing of native vegetation on the Swan Coastal Plain should be a thing of the past. A great deal of clearing has occurred since our organisation first began calling for a ban on further bushland clearing on the Coastal Plain. This disposition is not going to change and we are confident our precautionary approach to estimating how much native habitat will be needed to ensure our ecosystems can be maintained into the future will be proven to be correct.

Green network (p.36)

The UBC does not accept the use of terms such as “green” when it comes to the environmental planning as its meaning is open to varying interpretations. Natural landscapes consisting of native vegetation and habitat should receive their own separate treatment in these documents. It is quite misleading to combine Bush Forever sites and sporting grounds as if they shared the same environmental values. The catch-all term of “green network” encompasses many elements with very limited ecological value and this needs to be changed.

There is a remarkable difference between the amount of “green network” readily available to citizens in the north west portion of the Central Sub-regional Planning Framework (Figure 21) compared with that in the eastern portion bounded by the Swan and Canning Rivers. Even less is available in this area when it is understood that describing Perth Airport as part of the “green network” as if it were a reserve like Kings Park is ridiculous. Much of the area shaded green at Perth Airport has already been cleared and none of the land has any status as conservation reserve. A very large portion of the land could and should be reserved – as much of it was in the conservation precincts in *Perth Airport Master Plans* released prior to the present one - but our confident prediction is that the WA State Government will do precisely nothing to encourage the Commonwealth to take any such steps.

There are aspects of the “green network” concept that are worthwhile but it does not centre on protection of native vegetation or even of native species. It has the appearance of an empty gimmick. There are no guarantees on Bush Forever implementation and no proposals for new nature reserves. Furthermore, Local Government has little grasp of the need to plant native habitat trees in streets and parks in more urbanised environments and cannot be relied upon to establish “ecological linkages.” **This needs to be changed so that local native species are used in each region.**

DRAFT NORTH-WEST SUB-REGIONAL PLANNING FRAMEWORK

This Sub-region is faced with the prospect of losing very large areas of native vegetation. Already very large areas of native vegetation and habitat have been cleared along the northern part of the coastal strip in recent years and there is no compensating for this unacceptable ecological loss.

The UBC strongly supports the objective to “protect areas with regional conservation and landscape value’ (p.6) but cannot see the consistency between this goal and the projected urban development for the region. It is also difficult to reconcile the aim of conserving areas of regional conservation value with the objective to “protect areas with basic raw materials for timely extraction” (p.6). There are clearly overlaps between basic raw materials and native vegetation and it is our very strong view that the conservation of native vegetation must take precedence. This should not only apply to Bush Forever sites but native vegetation in general.

It is our very strong view that much of the land zoned urban but as yet uncleared of native vegetation should be set aside for conservation purposes. This development along the coastal strip is urban

sprawl at its worst. The road system connecting these areas with central Perth struggles to accommodate the existing traffic – even with a reasonably good rail system in place. There is no room for another freeway so how is all the additional road traffic going to be catered for?

Sub-Regional Planning Network (p.15)

The UBC would like to believe there is a comprehensive approach to planning aimed at “ensuring the conservation of regionally significant environmental attributes” (p15) but this area is notorious for the clearing of native vegetation on a large scale and we have not seen any guarantees that this is likely to cease. The document states that:

Within the sub-region there is a wealth of environmental attributes including the coastline, several national and regional parks that encompasses banksia woodlands, habitat that supports flora and fauna and a complex system of wetlands (p.16).

And furthermore,

To ensure that the impact on the environment is minimised planning for the sub-region will need to, in the first instance, carefully consider its environmental attributes (p.16)

At face value this is encouraging but the document is contradictory in its apparent claim that protecting “environmental attributes” is a key objective while allowing for future developments which are largely incompatible with good environmental outcomes with respect to the protection of native vegetation and habitat. The full urban development of the coastal strip as shown in Plan 1 (p.17) is an environmental disaster. But the document anticipates this development:

The North-west has become one of the most populous sub-regions and it is anticipated that this trend will continue through to 2050 as the sub-region has a significant supply (over 7,600 hectares) of undeveloped land and urban deferred zoned land available under the MRS, predominantly in the Coastal Urban Growth Corridor (p.18).

Zoning is not necessarily appropriate just because it is in the MRS and the environmental impact of the development of all the affected land would be unacceptable.

The location of industrial centres and the establishment and alignment of proposed roads are all matters requiring further environmental investigation and assessment. Again, it our view that protection of existing native vegetation and habitat should be a priority and urban sprawl should not go further as shown.

Environment and Landscape (p.38)

Once again we make the point that native vegetation and habitat should be treated as a separate subject in these documents. Areas of minimal ecological value that happen to have a Parks and Recreation zoning should not be equated with genuinely ecological significant native vegetation and habitat. Citing large areas that have parks zoning is meaningless in terms of the protection of our native flora and fauna.

There is no worthwhile description of the environmental attributes of the proposed two new parks and recreation sites (p.38) so we are unable to make informed comments on the matter other than to say we want the maximum amount of native vegetation and habitat conserved.

“Ecological linkages” (p.39) are a good idea but Local Government would need some remedial environmental education and indeed an enforceable requirement to get them to understand the need to plant locally and regionally native trees as opposed to exotic trees to protect our native flora and fauna.

NORTH-EAST SUB-REGIONAL PLANNING FRAMEWORK

Similar comments apply as for the above regions. The UBC's primary interest is in the protection of our native vegetation and habitat for flora and fauna.

We support the planning principles as rendered in the document with respect to the protection of "significant environmental values" - with the proviso that our understanding of "significant environmental values" (p.12) are defined. We have not noticed the Department of Parks and Wildlife having much to say about major clearing projects being planned in this region in recent times and we are not really very clear on how their conservation priorities are determined.

We hope the *Strategic Assessment of the Perth and Peel Regions* is a worthwhile and credible assessment process that properly informs the Sub-regional Planning Frameworks and that they are appropriately modified to meet its recommendations but as it is not even due for release until 2016 we are in the dark as to its processes and determinations.

We would have particular concerns regarding proposed developments around Ellenbrook and Bullsbrook in regard to potential impacts on native vegetation.

We are also concerned at the future potential impacts on native vegetation of the extraction of basic raw materials.

SOUTH METROPOLITAN PEEL SUB-REGIONAL PLANNING FRAMEWORK

Most of the general points the UBC has to make regarding this Sub-region would be similar to those made regarding the other Sub-regions.

The UBC supports the idea of "concentrating new urban areas in cleared pastureland rather than impacting on areas with regionally significant conservation values" (p.42). Destroying native vegetation and habitat in one area to fund the reservation of native vegetation in another area via an 'offset' is environmentally destructive and a strategy for serious habitat depletion. The planning priority must be the avoidance of clearing native vegetation and habitat.

The UBC has opposed the clearing of native vegetation in the Mandogalup and Baldivis areas in recent years and is of the strong view that there has been more than enough clearing permitted in this region.

The eastern side of the Swan Coastal Plain is almost bereft of native vegetation in this region and is of particular conservation significance. Protection of the region's outstanding wetlands and the (EPA's) recommended surrounding buffer zones and near-coastal lakes is essential.

The UBC objects strongly to the extraction of basic raw materials from within, and adjacent to, Bush Forever sites and from areas retaining native vegetation generally (p.44, 45).

CONCLUSION

1. The Urban Bushland Council is very disappointed with the *DraftPP3.5m* documents and their failure to address in a clear and well mapped fashion, the potential impacts of proposed urban expansion on remnant native vegetation and habitat. It is perfectly reasonable to expect that such a suite of documents, impacting as they do on the very sensitive environmental issue as the protection of our natural heritage and MNES, would have maps and overlays and images clearly showing what proposed urban expansion –including the development of land already zoned urban – could be expected to have on our remaining native vegetation and habitat.

2. This has been a very flawed consultation process.
3. The Planning frameworks do not show the impact on MNES.
4. The Sub-regional planning frameworks should be revised and withdrawn until the SAPPR is completed and presented for public comment. The environmental impacts of proposed structure plans must be clearly described and assessed in the SAPPR. It would have been much better and would have made much more sense if the *Strategic Assessment* had been completed first and put out for public comment, prior to or at the same time as the *Draft PP3.5m* documents. As it is, the community is not appropriately appraised of the environmental issues associated with the Sub-regional Planning Frameworks which we submit must be revised.
5. The expected extensive clearing of up to 20,000 ha of our biodiverse native vegetation especially in Banksia woodlands, and continued urban sprawl to the north especially and in the south region is totally unacceptable, and must be revised so that MNES are protected as required under the EPBC Act.
6. Offsets will not justify extensive clearing.
7. We support increased infill to 80% (rather than 47%) of projected growth, the remainder being on land already cleared but not on palusplain wetlands.

We would like the opportunity to discuss these important matters further with you.

Yours faithfully

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