

City of Gosnells  
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**Submission on the proposed Maddington Kenwick Strategic Employment Area  
Precinct 3A Structure Plan – Amendment No. 1 – Lot 414 Grove Road, Kenwick.**

The amendment specifically relates to the inclusion of Lot 414 Grove Road, Kenwick into the Precinct 3A Structure Plan area.

Dear Officer

The proposal for which the City of Gosnells is seeking comment shows a great misunderstanding of requirements needed for environmental protection and engineering and planning. The proposal is, once again as in the main Precinct 3A Structure Plan for the Linc Property development (Taylor Burrell Barnett, 2017) for a massive re-engineering of the landscape to effect a water wasting and polluting “pit and pipe’ drainage scheme instead of working with the existing environmental conditions to use modern and cheaper ‘infiltration at source’ methods that replenish groundwater and maintain wetlands and biodiversity This is totally unacceptable.

The Urban Bushland Council WA Inc is the peak community organisation for urban bushland recognition and protection of its biodiversity. The UBC has 75 member groups as well as many individual supporters.

The proposal on which we are making a submission, if implemented in its current form, will have

- major adverse impacts on hydrology of the wider area
- major adverse impacts on flora and fauna biodiversity
- significant impacts on MNES, notably Forest Red-tailed Black Cockatoos (FRTBC) and also on Carnaby’s Cockatoos; an important occurrence of the Threatened Ecological Community: *Shrublands and Woodlands on Muchea Limestone of the Swan Coastal Plain*; the Threatened Flora Species: *Grevillea thelemanniana* and *Lepidosperma rostratum*; and potentially also the Critically Endangered native bee *Leioproctus douglasiellus* for which habitat exists in the area impacted by this proposal in the TEC but has not been surveyed by the proponent.

In addition, in the face of further destruction for development, the community will be disillusioned, dissatisfied and angry. The ‘burnt earth’ clearing that has already occurred in Precinct 3A, where not one tree remains, is unacceptable and indeed shocking.

**World-class wetland**

As the City of Gosnells is aware, the Greater Brixton Street Wetlands is a world class wetland of amazing biodiversity: more ecologically diverse than any other area on the Swan Coastal Plain. The wetlands have over 500 species of flowering plants of which about 27 are carnivorous plants.

Whilst Amendment 1 of the proposed Maddington Kenwick Strategic Employment Area (MKSEA) Precinct 3A Structure Plan deals with part of the proposed development, what happens underground or just above the land's surface as a consequence of Precinct 3A, is not confined to Precinct 3A. The proposed drainage by the City of Gosnells and Eastcourt Pty Ltd in Amendment 1 would have major adverse effects on the outstanding conservation values of the Brixton Street, Greater Brixton Wetlands, Yule Brook and the intact areas that are Threatened Ecological Communities with threatened species. The stratigraphy in this area of vegetated wetlands is extremely complex, and any changes in sub-surface hydrology, such as a major reduction in infiltration of rainfall into the ground water (as is proposed over the entire Precinct 3A, including in Lot 414) will affect the hydrological processes that are essential for the complex vegetation of the TEC next to Lot 414 and the Greater Brixton Street Wetlands.

All of the areas are intimately linked, and all the flora are exquisitely dependent on the complex hydrology. Many invertebrates, yet to be discovered, would be associated with the endemic flora.

### **'Infiltration at Source': an essential feature of Water Sensitive Urban Design**

The State government, having '*a responsibility to protect, conserve and manage water resources*', has been encouraging Water Sensitive Urban Design for local and state developments for many years. A recent good example is the design for Optus Stadium, Burswood: a similar best practice, infiltration at source, Local Water Management Strategy is required in Precinct 3A instead of the harmful LWMS proposed in Lot 414 and in the greater area of Precinct 3A.

City of Gosnells chief executive Ian Cowie was quoted as saying that '*the City fully appreciated the wetland's importance and were committed to its preservation*'

and

*'Planning the for the Maddington Kenwick Strategic Employment Area (MKSEA) is fully cognisant of the need to ensure no disturbance that would negatively impact on the wetland's preservation'*.

Linc also has stated that it has '*developed a wide range of Water Sensitive Urban Design strategies that have been incorporated*'. However, Water Sensitive Design that would have demonstrated infiltration at source, has been over-ruled for pipes, pits, basins and drains. Precinct 3A has, so far, misrepresented the intent of the LWMS it will employ by, for example, calling the open drains it will install 'conveyance swales' whereas, infiltration at source explicitly disconnects water from conveyance via drains of the type proposed throughout Precinct 3A (including in Lot 414).

*'The hydrology of the area is the most complex of the entire Swan Coastal Plain. Water travels below ground welling up where resistance is less. This complex hydrology combined with the very low nutrient status accounts for the tremendous plant diversity of the area.'* (Profs. Lambers, Dixon, Hopper and Loneragan, 2016, submission to WAPC).  
Onto this complexity the City and Linc propose water treatment that will completely alter the hydrology and certainly threaten the outstanding values of the Bush Forever sites. Indeed the impacts could be catastrophic.

Figure 11, 'Surface Water Features and Wetlands', of Emerge Australia's 'Environmental Assessment and Management Strategy, MKSEA Precinct 3A Structure Plan', shows that there is very little of the area that is not 'Multiple Use' wetland. **The whole area is wetland**

**of various types.** To make the area suitable for industrial development as proposed would be very destructive to the landscape, especially when wise use of wetlands, water sensitive design and State Government policy explicitly recommend the management category of MUW to be used to assist in LWMS, not more destruction of wetlands in the MUW category.

The main aim of the project *'To determine if future industrial development can occur whilst ensuring the protection of key environmental characteristics of the area'* (Maddington Kenwick Strategic Employment Area: City of Gosnells) **is not achievable in the Structure Plan for Precinct 3A and the current Amendment 1.**

The Urban Bushland Council calls on the City of Gosnells, Linc Property and Eastcourt to redo plans relating to hydrology and water treatment so that best practice modern and sustainable water sensitive planning, **mandating**, on lot and at source, water quality treatment and infiltration. Such user pays measures are well proven to be the most economical and cost-effective solutions to stormwater management for both for landowners and for Local Government. Adequate undisturbed environmental buffers (not roads) must also be put in place for sensitive areas: the 30m buffer proposed around the TEC in wetland UFI in Amendment 1 is grossly inadequate and does not even meet the 50m minimum buffer requirement, let alone the requirements for a buffer to separate **industry** from MNES in the form of an Endangered TEC wetland that includes Critically Endangered Flora and habitat of Critically Endangered Fauna. **Forest Red-tail Black Cockatoo (FRTBC) roost site.**

It is nonsense for Linc Property to state that its "conservation strategy" will avoid impacts on the FRTBC by conserving 70% of the roost area (Conservation Strategy June 2018), when 30% of the roosting site will be destroyed and when 7ha of marri adjoining the roost site has been cleared. Any clearing will have an impact on FRTBC and the effect of Linc's clearing of 7ha of Marri in early 2018, the clearing Linc proposes in its conservation strategy and Eastcourt's proposed actions in Lot 414 in this Amendment 1 are **cumulative** and will significantly impact FRTBCs and other MNES.

The additional clearing of another 1.4ha in Lot 414 of FRTBC quality forage habitat (Marri); and four large "breeding habitat" trees on the Lot 424 verge is highly significant impact and not acceptable in the **context** of:

- Lot 414 being located very close to a major roost (334+ FRTs including 90m juveniles) of FRTBC, in Edward St of Precinct 3A (Great Cocky Count, 2018);
- The use of this Marri by FRTBC in their flight paths and mustering behaviour on their way to the roost (Great Cocky Count, 2018);
- A proven breeding area of FRTBC nearby in Kenwick; and
- A nearby permanent water source in the Woodlupine Brook Wetland Reserve.

The Federal government's Revised draft Referral Guideline for three threatened black cockatoo species (2017) states:

*Currently the overall population trend for **all three black cockatoo species** is declining.*

*Clearing very high to high quality foraging is likely to result in a significant impact (p18)*

The definition of high quality foraging habitat is *'High quality foraging habitat, particularly in proximity to roosting sites and/or breeding sites, demands protection. Foraging habitat with a score of 7 or above is considered high quality and is important for the long-term survival*

and recovery of black cockatoos. Impact to high quality foraging habitat should be referred.' Marri trees are the most important habitat trees for FRTBC.

Clearing of 30% of the roost site trees is a significant impact. We understand that the roost trees are very full of FRTBC when there are peak numbers, so the loss of 30% of the site is significant. There is competition for inadequate food resources. Carnaby's Cockatoos also use Marri as a favourite food – as do other parrot species.

Clearing of ~51 trees at the roost site is very significant (p 51 Conservation Strategy).

Clearing of 7 ha of quality Marri forage habitat and significant, potential nesting trees adjacent to the roost site is a significant impact. Notably this area has been already cleared early 2018 and this was not acceptable.

The presence of black cockatoo breeding within the Greater Brixton St wetlands is significant.

The count of more than 334 FRTBC at the 2018 Great Cocky Count is a large number, making the roost **the 4<sup>th</sup> largest roost site (GOSKENR001) of all the sites counted.**

It is understood that Linc propose planting Marri trees among the *Eucalyptus camaldulensis* in a constructed water basin. Marri will not tolerate flooding and the existing *E. camaldulensis* in the roost is known to not survive flooding for much of each year, annually in its natural habitat in arid Central Australia and the eastern states. The trees are likely to not survive in the roost under the altered hydrological regime imposed by the conversion of this currently well drained area into a sumpland (a seasonally inundated basin) with a long hydroperiod. Even though a commitment has been made by Linc for further planting around the roost sites, further planting '*within the Greater Brixton Street Wetland and within the City of Gosnells parks and recreation sites*' (p 14 Conservation Strategy), the clearing of 7ha of Marri adjacent to the roost site **should not have occurred** and the proposed clearing of 30% of the roost site trees should be revised so that there is:

No clearing of existing trees in and adjacent to the roost;

The Detention Basin not built in the roost area; and

The roost protected by at least 100m of Marri revegetated buffer all around it.

Most relevant to Amendment 1 of Precinct 3A of the MKSEA is that the section of Grove Rd from Coldwell Rd to Brook Rd that border Lot 414 (part of which is currently a 35 kph speed limit area) has traffic controls to mitigate impacts on the large flock of FRTBC that use the area daily in most seasons. There should be controls on permitted hours of traffic adjacent to the roost and adjacent to Lot 414 (e.g. dawn to dusk curfews on RAV3 – RAV 7 vehicles using Grove Rd); speed limits of 35 kph on Grove Rd from Brook Rd to about 250 m north of Coldwell Rd; and other controls on directions and placement of lights, noise, vibrations, dust and fumes enforced.

### **The TEC and Threatened Flora area impacted by drainage**

All the stormwater collected from 230 hectares of catchment over the site including from Welshpool Road and Lot 424 will impact the TEC and threatened flora areas before flowing through into Yule Brook. Five water basins will be constructed north of the TEC area with three of them close to the TEC area. An 100m wide buffer is recommended to

protect the TEC area but a 30m wide buffer is proposed by Linc. Linc maintain that the amount of water draining or being pumped from the detention basin will be equal to that amount of water in the ground prior to the proposed development. However the Brixton Street Wetland and the TEC area are waterlogged for less than a couple of months or less annually and then is dry, so that most of the rare plants in these wetlands have adapted to this hydrological regime and live in that wet/dry situation and will be lost with the changed hydroperiods (that have not even been acknowledged as a relevant factor by the proponents) in either of the Structure Plans for Precinct 3A (Taylor, Burrell, Barnett, 2017; and Amendment 1 of the latter).

## **Conclusion**

There are so many problems associated with the current proposal. The lack of hydrological and holistic ecological assessment of the impacts of the MKSEA on the GBSW and Yule Brook and the resultant knowledge deficits exhibited by the EPA, the WAPC, the City of Gosnells and Linc relating to environmentally sensitive areas over the site and what sustains them, has led to this unacceptable situation.

The proposal before us must be greatly improved, in particular by rethinking the plan for water on the site.

Our best scientists have contributed their expertise to the Structure Plan and the UBC urges the City to respect those views and to redeem the proposal and require its thorough revision.

We have the most wonderful biodiversity on these wetlands and iconic threatened species, all at risk if the current plan is implemented.

We may be contacted at the UBC on 9420 7207 or on 9444 5647 or contact our Secretary Margaret Owen on 9381 1287.

Thank you for the opportunity to send in a submission.

Yours sincerely

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