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The Urban Bushland Council WA Inc. makes the following submission on the draft State Infrastructure Strategy for WA.

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The Urban Bushland Council WA Inc. (UBC) is an association of more than 80 community groups with a common interest in the protection and management of urban bushland in WA.

Our major concern is with preserving and enhancing our unique, highly biodiverse natural environment and landscapes.

1. The draft Strategy starts with the recognition of WA's unique ancient natural landscapes and biodiversity that shaped Aboriginal culture, and that will continue to provide tourism income, and reduce our future financial burden by keeping our people mentally and physically well, and in moderating the climate.

The natural landscape with all its special features is the natural infrastructure element providing the context and setting for all other infrastructure types.

This major and critical element is missing from the recommendations.

It is therefore strongly recommended that the natural landscape environment be included. Landforms and natural vegetation and associated fauna are the basis of all planning and should have the highest weighting of importance. (see [Capital Cities Planning Framework 2013](#))

Further, the recognition of the status of the south west of WA being a *global biodiversity hotspot for conservation priority because it is under threat* should be included.

2. **Protection of native vegetation**
Specifically, it is strongly recommended that the Infrastructure Strategy includes protection of our remaining natural vegetation and especially all Bush Forever Areas and their ecological linkages; local bushland reserves; and threatened ecological communities and habitats of endangered species. **New infrastructure must be confined to lands already cleared, and this needs to be included in the Infrastructure Strategy.** This will help prevent further loss of irreplaceable native vegetation cover of high biodiversity value.
3. **Current implementation** of environmental laws and regulations are failing to properly protect native vegetation that is supposed to be protected. The use of 'exemptions' are unacceptable, and 'offsets' do not justify significant impacts of unacceptable clearing. The continuing net loss of native vegetation in our biodiversity hotspot by clearing for infrastructure developments, and/or degradation through mismanagement, must be stopped.

4. The Strategy strongly expresses that we should not undertake developments which will cost more in the future, but it fails to recognise the value of native vegetation for the many essential services it now provides.
5. The poor condition of natural bushland that has been allowed to degrade is no excuse to justify clearing and building on it. Remnants of bushland all contribute to the surrounding ecological functioning and as essential 'stepping stones' for fauna moving across the landscape.
6. **Over cleared lands:** All remaining Perth and south west urban areas as well as the Wheatbelt farm lands have already been **over cleared** and should not be approved for any further clearing by 'offsetting' with promised protection of existing natural vegetation somewhere else. All these landscapes now have vulnerable or endangered species of wildlife and plants and need **protecting** by rehabilitation to enhance environmental outcomes.
7. **Jandakot Groundwater Protection area**
Recommendation 51 (p. 173) is not supported. While Jandakot groundwater is being used for potable supply, its surface intake area which is classed as the Jandakot Groundwater Protection Area must be fully maintained with no rezoning or developments in order to prevent contamination.
8. **Infrastructure agencies:** The three infrastructure agencies Water Corporation, Main Roads WA, and Development WA each need to be required to plan their works so that there are no incursions whatsoever into bushland areas and especially conservation areas. This will be a significant change towards better outcomes.
In recent years for example, the Water Corp has in three cases proposed and pursued pipelines within and impacting on highly significant conservation lands. This is despite in early stages in each case, consulting our organisation and experienced expert scientists who recommended alternative options that would have **avoided** the unacceptable impacts. This expert advice was ignored. These destructive incursions must be stopped.
Main Roads has continued to clear roadsides especially in the Wheatbelt and south west where this could and should be avoided. The Wheatbelt is already very seriously over cleared and the Strategy should specify this and emphasise that there will be no further clearing for infrastructure in this region. Also it is recommended that revegetation of roadsides to increase canopy and ecological linkages will be a priority.

Thus in general, it is strongly recommended that all infrastructure agencies confine their works to lands already cleared in the south west and Wheatbelt.

Further, it is recommended that purpose permits and exemptions in these regions be resumed and cancelled.

9. **Climate Change Strategy**

The target for net zero emissions should be 2030. Our biodiversity is at extremely high risk from climate change impacts. Remediation and bush regeneration will become much more expensive if strong action is not taken in the next 10 years.

Already the many community volunteer groups conducting on-ground bushcare are having less restoration success because of lower rainfall, more heat waves, more extreme weather events, and variable seasons.

We welcome climate change strategies that require state agencies and government trading enterprises develop actions to enhance climate resilience. This must include an end to coastal developments which are well recognised for their long term financial burden. The Strategy needs to state this clearly: keeping the coast for recreational use; and protecting the coast from erosion and degradation with continuous vegetated ecological corridors.

It is strongly recommended that maintenance and enhancement of coastal vegetation as the best form of coastal protection be made a priority. There are many benefits for the environment and also citizens' health and wellbeing.

10. **Aboriginal Support**

The Strategy rightly comments on the value of preserving Aboriginal culture and country which is the natural landscape, its inherent biodiversity and waterways.

It is not acceptable to justify clearing by giving Aboriginal people jobs in doing this to provide renewable energy. Alternatively Aboriginal people will benefit from employment and business opportunities that protect their culture **and country** by maintaining nature and water quality.

11. **Carbon farming**

We welcome and support carbon farming to restore degraded farm land and for enhancing environmental outcomes by revegetating with local native species. **Also support for new projects similar to Gondwanalink are strongly recommended.** Retaining local remnant vegetation on farmlands is essential. Also it is known that increasing vegetation cover assists in **increasing local rainfall**. Plantations of carbon 'crops' such as Sandalwood and other local species of timber are recommended.

12. **Urban Forest**

We support Recommendation 25: 'Develop an overarching urban forest strategy for the Perth and Peel regions...' (p.114).

We welcome the Strategy for more liveable cities and towns by planting lots more **local native trees** on roadsides and in home gardens, and on other properties. This will help in urban cooling and assist biodiversity conservation with 'garden wilding'. The heat island effect in Perth suburbs needs to be addressed.

It is recommended that in public car parks, all local government councils be required to plant local native trees and shrubs to increase the urban green canopy and help cool car parks. Also the layout should allow runoff from the hard surface to flow to the trees.

13. **Transport strategy**

Strategy Recommendation 60: Increasing active transport infrastructure (cycling and walking): Walking and cycling has health benefits. Regardless of transitioning to electric vehicles, which is recommended, active transport should be promoted with good infrastructure of safe connected walk and bike paths, and dedicated sites to park bikes. The Strategy has a focus on private vehicle use, and not enough on walking and cycling.

It is recommended that cycling and walking infrastructure includes the addition of shady local native trees and understorey shrubs that provide habitat for local birds and wildlife.

It is strongly recommended that new bike paths and mountain bike trails not be located in

bushland reserves or bushland sites. This requirement needs to be legally enforced for all land managers, especially local governments and state agencies.

Active recreation use is in conflict with nature conservation and is also in conflict with passive recreation use. Construction of paths requires clearing with degrading edge effects which promote weed invasion and risk of dieback and also is a risk to some fauna. Bike paths should be confined to cleared lands.

14. Tourism Destination Infrastructure

Protection of WA's unique and rich biodiversity should be mentioned and integrated into tourism infrastructure projects. Our natural areas deserve much more promotion for their enjoyment.

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