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**Proposed Lot 20 and 42 Marriott Road, General Industrial Development, Wellesley WA
EPBC 2021/8883**

The Urban Bushland Council WA Inc. makes the following comments on this proposal being assessed as a Controlled Action under the EPBC Act concerning Matters of National Environmental Significance (MNES) including listed threatened species and communities, under sections 18 and 18A.

The significant impacts are on:

1. **Threatened ecological community (TEC): Banksia Woodlands of the Swan Coastal Plain** are listed as an endangered ecological community under the EPBC Act. The proposal includes clearing and loss of 10.82 ha of this community.

This is unacceptable as it is contrary to the **Approved Conservation Advice** for this threatened community under the EPBC Act:

The **Advice** is '*to PROTECT the ecological community to prevent its further loss of extent and condition.*' This means that the loss of the 10.82 ha by clearing must not be allowed. The proponent therefore should ensure that the 10.82 ha in the 3 intact areas are not cleared and are protected.

These areas will also need a buffer zone around each of them to prevent incursions and edge impacts on the vegetation communities.

The Conservation Advice also says there is a need '*to RESTORE the ecological community*'. This especially applies to the area in less good condition (and proposed to be cleared) which must instead be retained and restored.

At the WA State level, the above areas of Banksia Woodland TEC are classed as regionally significant bushland within the Special Control Area (SCA) number 2 under the Greater Bunbury Region Scheme and should be reserved as Regional Open Space as an amendment to the Greater Bunbury Region Scheme. This advice from the WA EPA has been ignored. This is unacceptable.

2. **Three listed Threatened species: Carnaby's Cockatoo, Forest Red-tail Black Cockatoo, Baudin's Cockatoo.**

For each of these iconic WA species, the area proposed to be cleared includes:

- 1.47 ha of 'moderate quality' habitat plus
- 19.87 ha of good quality habitat
- loss of 169 potential breeding trees.

Loss of this habitat is unacceptable and is contrary to the Recovery Plans for each of these species. Breeding trees take more than 100 years to develop adequate hollows for breeding so old mature trees are considered to be irreplaceable critical habitat. Surrounding vegetation for foraging is also critical habitat for breeding.

While your documentation acknowledges that the clearing will have a '**significant impact**' on these threatened species and communities, it does not **avoid** the impacts. There will be an unacceptable net loss. Further, approval with conditions to provide offsets, do not remove the net loss of habitat.

3. Diversity of plant communities in the 27.16 ha of native vegetation

The 27.16 ha of vegetation of the proposal area comprises 4 vegetation communities on the Bassendean and Pinjarra landforms and Spearwood Dunes and is in 3 relatively intact portions. This is clearly visible from the air photo. These communities are inherently diverse in flora species.

Also 77% of the proposal area is already cleared, so this means that less than the minimum desired 30% remains, with only 23% remaining. The rest is cleared farmlands with scattered Marri and Jarrah trees which are significant for connectivity of habitat.

This is reason alone that no more clearing is acceptable.

4. Diversity of fauna

The presence of 93 vertebrate species is significant. In addition, another 161 species of fauna 'are considered to have the potential to occur' within the KSIA. This is evidence of significant inherent species richness and is reason for all the vegetation to be retained.

5. Wetlands of national significance: Wellesley River, Leschenault Estuary

The Wellesley River is considered to be a 'Conservation Category Wetland' and it flows into the significant Leschenault Estuary. The proposed clearing and industrial development will inevitably result in increased nutrient export and other pollutants to the River and then into the Estuary.

These waterways are already eutrophic.

In particular the Leschenault Estuary is at unacceptable risk of both increased nutrient and other pollutants resulting from the clearing and disturbance from industrial developments. This would likely result in increased algal blooms, some of which may be toxic (such as *Anabaena flos aquae*).

In addition, the presence of Acid Sulphate Soils (ASS) and Potential Acid Sulphate soils (PASS) on Bassendean landforms and along the Wellesley River and its riparian vegetation zone is a significant high risk. ASS and PASS must never be dewatered or drained. If dewatered, the resulting acidification is irreversible and would have unacceptable impacts on water quality in the River and thence in the Leschenault Estuary.

Therefore we submit that clearing and industrial development on this landscape is an environmentally unsuitable and unacceptable land use.

It is recommended that DevelopmentWA seeks advice from Dr Steve Appleyard at DWER as he is the State expert on ASS.

Section 6: 'Environmental record of the person proposing to take the action'

The 'person' is DevelopmentWA.

The environmental record of DevelopmentWA in planning and seeking approvals for the Ocean Reef Marina project by breaking the project into a series of small sections for assessment is an unacceptable record. This project is destroying a significant Bush Forever site 325 'Coastal Strip from Burns Beach to Hillarys' on the Quindalup Dunes. Scientific and community advice and objections have been ignored.

CONCLUSION

The Urban Bushland Council WA Inc. recommends that the proposed clearing in Lot 20 and 42 Marriott Road Wellesley not be permitted and not take place, as the impacts on MNES and associated lands would be significant and irreversible with a net loss, and are therefore environmentally unacceptable.