

Lot 20 and 42 Marriott Road Commercial Development **Kemerton General Industrial Area**

The Urban Bushland Council's reasons for requesting a PER for this proposed development are because this is a significant proposal – as declared by the proponent and by the Department of Agriculture, Water and the Environment.

The proposal was referred to the Commonwealth Department of Agriculture, Water and the Environment (EPBC 2021/8883), and was considered a controlled action due to Matters of Notional Environmental Significance – listed threatened species and communities.

As stated in the documents provided under 'Referral' the residual impacts to listed threatened species and communities, namely:

- Clearing 10.82 ha of Banksia Woodlands TEC (5.4ha in good condition and 5.40 ha in degraded condition)
- Clearing of habitat critical to the survival of black cockatoos (up to 21.34 ha of moderate or higher quality foraging habitat) and 168 potential breeding trees

are considered significant.

Despite the significance of this proposal to threatened species and the Banksia Woodlands of the Swan Coastal Plain endangered community, the consultant Eco Logical stated: *'Suitable offsets are proposed to compensate for these significant residual impacts'*.

The offset strategy is not present at Appendix A. As Banksia Woodlands cannot be replicated by planting, the UBC is unable to see that a net gain would be achievable. The cumulative effects of loss of Banksia Woodlands continues through this proposal.

In addition. The UBC is concerned about the fact that the whole development area is a *'winter-wet plain where groundwater is at or just below the surface during mid-winter to early spring in an average year'*. (See Figure 5 Wetland Classification where the whole proposed site is Multiple Use Wetland apart from the dunes and wooded areas.)

Acid Sulphate Soil risk is high to moderate along the Wellesley River and moderate to low over the rest of the site. A very high percentage of Western Australia's wetlands have been filled, degraded and cleared and as a conservation wetland is mapped over the Wellesley River and the rest of the site is mapped as Multiple Use Wetland, the UBC seek protection of the wetlands through the EPA conducting a PER. The Surface Water Plan is complex and the PER would be beneficial for understanding risks to the natural qualities of the site.