

**REASONS WHY THE URBAN BUSHLAND COUNCIL WA Inc. IS CALLING FOR A PER ON PERTH SURF PARK, JANDAKOT (City of Cockburn)**

**Significant proposal:** Public input to seek public opinion is highly desirable - to have an open and accountable procedure. The UBC agrees with the consultant that significant factors are likely to be and indeed will be Flora and Vegetation, Terrestrial Environmental Quality, Terrestrial Fauna, Inland Waters and Social Surroundings.

**Significant factors**

**1. Vegetation: Banksia Woodlands TEC :**

Banksia woodlands of the SCP is a Threatened Ecological Community and the threat is listed as 'endangered' under the *EPBC Act*. That means that the community is threatened with extinction. The *EPBC Act* Approved Conservation Advice for this TEC on page 43 is:

- (1) to PROTECT the ecological community to prevent further loss of extent and condition
- (2) RESTORE... by active abatement of threats, re-vegetation and other conservation initiatives and
- (3) COMMUNICATE WITH AND SUPPORT researchers etc.

The proposal, if implemented, would see the loss of at least 5.26 ha of this MNES Banksia Woodlands in good condition, with the small remaining part being unable to sustain its biodiversity. The condition of the community is assessed as being from Good – Very Good (PGV environmental) which is something to celebrate. **This proposed loss cannot be offset.** To be consistent with the Approved Conservation Advice as above, this proposed clearing is significant and should not be permitted ('prevent further loss..')

There is also presence of the Low-lying *Banksia attenuata* Woodlands or Shrubland (PEC), cited as being in Good-Very Good condition. Clearing of this vegetation community would be significant and unacceptable.

**2. Terrestrial Environmental Quality: Extensive fill to several metres**

Where would this fill come from? From further clearing of native vegetation sites? This is unacceptable. There would be a significant change and loss of environmental quality at both the site where fill is obtained, and at the Surf Park site. There is plenty of surfing location on the natural west coast, so why construct an 'artificial' surf site which is environmentally degrading.

**3. Fauna: endangered Carnaby's Cockatoo and Forest Red-tailed Black Cockatoo and more**

The proposal is situated where at least these two species of endangered black cockatoos feed. Any further loss of Carnaby's habitat is unacceptable and contributes to loss of their population. Clearing will result in a net loss of habitat which is unacceptable.

Other native fauna rely on this vegetation that is described as 'habitat of good quality for fauna'. This is the continent where bird song evolved so let these species survive. As bird species are disappearing from Kings Park and other bushland areas, we have a duty to protect habitat that remains for our unique fauna.

#### **4. Inland waters**

There are many aspects of this proposal relating to water. A PER would solicit information and advice relating to water and threats to groundwater, threats to surrounding lakes and wetlands, excessive use of water (evaporation), threats of drawdown on vegetation. Such impacts would be very significant and have unacceptable impacts especially on groundwater hydrology as the groundwater table is close to the surface.

The Proposal includes loss of 1.202 ha of a Multiple Use Wetland (**MUW**). This is a significant and unacceptable impact.

#### **5. Social surroundings**

This is a huge proposed development. Several thousand homes lie less than 1 km from the site and at least three reserves. The impact on surrounding nearby residents would be significant.

Because of the very significant impacts this proposal will have, it is strongly recommended that it be formally assessed as a PER. And indeed it should be refused as it is environmentally unacceptable.