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Ashfield Flats Master Plan – Consultation
Rivers and Estuaries Branch
Department of Biodiversity, Conservation and Attractions
17 Dick Perry Avenue,
Kensington WA 6151

Dear Officers,

DEVELOPING the ASHFIELD FLATS MASTER PLAN

The Urban Bushland Council WA Inc. (UBC) is pleased to present this submission in response to your invitation to address the issues of relevance to us.

Our organisation is a voluntary community association of 87 member groups (each with their own local membership from 10-165 individuals) and 100 individual supporters – all of which have a common interest in the conservation of urban bushland and wetlands. UBC is an incorporated, not for profit organisation registered as a charity. <https://www.bushlandperth.org.au/>

We are the key community organisation in WA providing a public voice on the need for retention of what remains of our urban bushland and wetlands which is also critical for a healthy and prosperous future. We advocate to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our 'Friends Groups' and their many volunteers – from all walks of life 'working' to improve and maintain the health of patches of neighbourhood nature – many working in close collaboration with your department and their local council.

Our submission is in two parts with specific comments at Attachment A.

Valuing local volunteer friends of / urban landcare / bushcare groups

UBC is concerned that at times the Swan River Trust (SRT), Department of Biodiversity, Conservation and Attractions (DBCA) and some local government authorities (LGAs) are not collaborating adequately with the community volunteers working in natural areas within and/or adjoining the Swan Canning Development Contra Area. These volunteers put their expertise, local knowledge, heart and soul into improving the ecological benefit for nature and as such, for everyone.

We commend the government for their Guidelines for coastal development that have as a priority to consult with their Bushcare volunteers. We recommend that this be incorporated in policy and locality plans for Ashfield Flats.

We are proud of the care and advocacy of the local Bassendean Preservation Group (BPG) and Baigup Wetlands Interest Group (BWIG) whom we are privileged to have as members.

Congratulations

The UBC congratulates the Department of Biodiversity, Conservation and Attractions (DBCA) for giving conservation management priority to the environmentally significant Ashfield Flats including investigating the important and complex hydrogeology of the area.

UBC endorses DBCA's assessment, with the change of the word 'may' to 'shall'.

Why are the Ashfield Flats so important?

The Ashfield Flats are home to the Subtropical and Temperate Coastal Saltmarsh Threatened Ecological Community (TEC). The TEC is recognised under State legislation (*Biodiversity and Conservation Act 2016*) and protected under Federal legislation (*Environment Protection and Biodiversity Conservation Act 1999*).

More active management may be required to protect the important values of the TEC to ensure it is not lost.

Improving protection of Subtropical and Temperate Coastal Saltmarshes Threatened Ecological Communities (TEC)

Applying the 'Approved Conservation Advices' for the Subtropical and Temperate Coastal Saltmarsh Threatened Ecological Community (TEC) which state that under the 'Priority protection and restoration actions', the three key approaches to achieve the conservation objectives are:

- *PROTECT the ecological community to prevent further loss of extent and condition;*
- *RESTORE the ecological community within its original range by active abatement of threats, re-vegetation and other conservation initiatives;*
- *COMMUNICATE WITH AND SUPPORT researchers, land use planners, landholders, land managers, community members, including the Indigenous community, and others to increase understanding of the value and function of the ecological community and encourage their effort in its protection and recovery.*
... Actions inconsistent with these recommendations that are likely to significantly affect the ecological community should not be undertaken.'

This will ensure protection of extent and condition of this 'vulnerable TEC' that is capable of providing:

- natural habitat (eg wader birds, crab spawning)
- blue carbon (high carbon sequestration rate)
- river ecosystem health including filtering of nutrients
- biodiversity and
- erosion control.

Limiting nutrients reaching the river – catchment wide

With the ongoing hydrology investigations and water sampling that continue to show 'elevated concentrations of nutrients and heavy metals that discharge to the Swan River' there is an immediate need to determine where in the catchment the pollutants are coming from and have these controlled at source. We do also expect that some of this is leaching from historic land use and pollution, however the impacts need to be mitigated to prevent further degradation of the area.

There have been significant improvements led and shared by collaborating organisations such as the South East Centre for Urban Landcare (<https://www.sercul.org.au/our-projects/urban-waterways-renewal-project/>), Water Corporation's 'Drainage for liveability' (<https://www.watercorporation.com.au/Our-water/Sustainability-and-innovation/Drainage-for-liveability>) local governments (LGAs) eg City of Canning (<https://www.yoursaycanning.com.au/nurdi-park>) and SRT/DBCA. These learnings should be embraced to ensure:

- ecological alternatives to present drains 'out-falling' directly into the rivers
- effective and sensitive design of living streams for drainage areas to return natural functioning vegetation for filtering and habitat
- revegetating all river edges with local sedges to filter nutrients - also acting as erosion control and thus reducing nutrient release from stored sediment.

Acknowledging and incorporating Whadjuk Noongar connection, values and terminology of the Derbal Yaragan

Incorporating Whadjuk Noongar terminology is demanded by the public as they not only want to learn about the Aboriginal cultural values of the Derbal Yaragan they want to see them respected and applied to future management. As such we would expect the draft documentation to include joint terminology especially the indigenous name for the Swan Rivers.

We expect that there is comprehensive consultation with Traditional Owners that speak for the land and that this is made public so the community can be assured it has occurred and can learn from it.

The cultural stories for the Ashfield Flats such as those told by knowledge woman, Marie Taylor, on the DBCA website for Jenalup (Point Walter/ Blackwall Reach) should be available on path signage by way of a QR code.

Dual Naming of areas

Friends volunteer groups would welcome their patches to be dual named. Perhaps these groups could help with the process if DBCA is willing to teach them.

Detrimental impacts of lighting

We request that lighting (style and timing) in and around Ashfield Flats will not have a detrimental effect on wildlife (eg insects, birds, reptiles, mammals). In particular, since insects are fundamental in the food chain, their protection in bushland is paramount. Often there are public shared paths (PSPs), roads, sports fields and club facilities with ecologically damaging lighting.

Since January 2022 the WA State Government has a [Dark Sky Position Statement](https://www.wa.gov.au/system/files/2022-01/PS_dark_sky_astrotoursim.pdf)
https://www.wa.gov.au/system/files/2022-01/PS_dark_sky_astrotoursim.pdf

EXTRACT: Scientific studies show that light pollution and sky glow can have indirect and direct physiological and behavioural impacts on our wildlife.

Exposure to certain types of artificial light can result in changes to some animals feeding and breeding behaviour, reduced survivorship, and can attract invasive pests or predators. Preserving dark skies through application of dark sky principles and minimising light pollution can lead to positive outcomes for light sensitive wildlife and complements existing environmental protection frameworks.

Light pollution from subdivision and development proposals may impact on native or threatened species, which are protected under the *Biodiversity Conservation Act 2016* or the *Commonwealth's Environment Protection and Biodiversity Conservation Act 1999* for Matters of National Environmental Significance. Decision-makers may refer proposals to the Environmental Protection Authority (EPA), the Department of Biodiversity Conservation and Attraction (DBCA) or the Commonwealth's Department of Agriculture, Water and the Environment (DAWE), and should refer to their National Light Pollution Guidelines for Wildlife (as amended) to mitigate potential impacts.

Insect ecologist, David Knowles of Spineless Wonders has much knowledge on suitable lighting and we are sure would welcome being consulted.

Cats

Cat control is essential. Whilst we commend LGAs with good cat laws which prohibit cats from bushland, since residences are next to the bushland, cats are killing wildlife including insects, birds, lizards and geckos in backyards and in nearby natural areas during both the day and night. We recommend ring-lock fencing along residences and bushland, with thick plantings obscuring entry through fencing.

Dogs off-lead

Dogs should not be allowed off-lead in Ashfield Flats (nor the adjoining riverine areas). Dog owners/carers should be encouraged to use low ecologically functioning areas away from the river for exercise. LGAs require the state government (eg via the Swan Canning Development Control Area Plan) to determine what is permitted as they do not have the expertise to deal with strong dog lobbies.

In addition, DBCA needs to articulate its science-led decisions.

When off-lead or not under control, dogs have a major impact including:

- frightening and disturbing wildlife (eg interrupting wader birds that are feeding on the river edge to build up their reserves for long migratory flights)
- clearing wildlife from areas by leaving scent
- urinating and defecating in reeds, that then washes into river adding to the nutrient load. (We also don't want dog owners adding to impact by trampling native vegetation to pick up dog poop).

Anecdotal Note: When talking to dog owners why they let their dog off lead and chase wildlife they respond that "*their dog never catches the wildlife*". They fail to understand the harm caused by chasing birds, interrupting the foraging of wading birds etc.

Although there may be fines for dog owners if their dog chases wildlife there are never rangers patrolling. At some areas, packs of dogs race into the water for a swim oblivious to wildlife. It is often dog owners who are incensed by other dog owners' lack of regard for wildlife when exercising their dogs.

General Signage

Incorporation of Bush Forever should be sign posted to:

- educate and inform the community, developers and land managers of the significance of these areas,
- minimise community asking for an alternative use of these important natural areas.

Enhancing and complementing the value and respect of the remaining bushland with well-considered, sympathetically designed general informative signage is needed to communicate the value and fragility of the Ashfield Flats for wildlife and river health.

Fencing

Fencing has been shown to provide some of the best management protection for natural areas, as such we recommend:

- DBCA recognise ring-lock fencing is the most cost effect protection for bushland. In some areas more will be required and thick entwining plantings are recommended.
- DBCA take the lead, as many LGAs lack the will or expertise to make these decisions. It causes friction in the community and it is best this decision lies with DBCA acting on science.
- A uniform message is included in the DCA documentation that highlights the value of fencing for wildlife protection and the health of the rivers and foreshores.

UBC strongly supports the needs for permanent fencing to protect the conservation value of the TEC.

Paths

Any paths must not impact on the hydrology required to sustain the TEC, as such UBC strongly supports the relocation of paths away from impacting on the conservation management of the TEC.

Some sections of the paths at Ashfield Flats are very close to the TEC and may need to be relocated to give the TEC room to grow and move over time.

Whilst public shared paths (PSPs) are an important option for both managing access whilst enabling people to explore the area, it is important that their construction and environmental footprint is minimised. As such, paths can be inundated and having areas that are inaccessible for short periods reinforces for our connection with nature.

Unfortunately, DUPs are a key conduit for weeds and rubbish into the reserve. Active conservation management is needed to ensure these do not impact on the conservation values of the area.

Recreation

Enhancement of the recreational values is outside UBC's brief, except and until they have the potential to impinge on the environment values of this important area. That is, the natural values of Ashfield Flats must remain the determining factor in how the area is managed. In addition UBC supports the recreation being passive - non organised recreation.

UBC welcomes the opportunity to further discuss our submission.

ATTACHMENT A: SPECIFIC COMMENTS LINKED to ONLINE SURVEY

| Extracts from Ashfield Flats Master Plan Social Pinpoint (mysocialpinpoint.com.au) | Urban Bushland Council (UBC) response/comment |
|---|--|
| Climate change / action | <p>Mitigate and manage for climate change Anticipated sea level rise will impact Ashfield Flats including the stabilisation of the river edge. UBC understand best practice management will be investigated and applied.</p> |
| <p>7. How important is it to you that you can do these activities at Ashfield Flats? 7f) Watching wildlife 7g) Enjoying the natural bushland 7h) Enjoying the natural river foreshore</p> | <p>Very important Very important Very important</p> |
| <p>8. How would you describe your understanding of the Threatened Ecological Community, their recognition under State legislation and environmentally significant under Federal legislation and the protected bushland that exists in the Ashfield Flats?</p> <p>Threatened Ecological Community (TECs) Threatened Ecological Community (TECs) are a naturally occurring group of plants, animals and other organisms interacting in a unique habitat that are at risk of being destroyed or are presumed to be destroyed. TECs are recognised and protected under State and Commonwealth legislation. Ashfield Flats contains a significant occurrence of the Subtropical and Temperate Coastal Saltmarsh, which is a recognised TEC. The TEC at Ashfield Flats is significant because of the diversity of saltmarsh vegetation and the wildlife this supports. This TEC is listed as vulnerable by the Commonwealth as it is considered to face a high risk of extinction in the medium-term future. Changes to the environment from sea level rise of the Swan River, groundwater pollution, weeds and unmanaged access (humans and pets) are currently threatening the TEC at Ashfield Flats. Some sections of the paths at Ashfield Flats are very close to the TEC and may need to be relocated to give the TEC room to grow and move over time. More active management may be required to protect the important values of the TEC to ensure it is not lost.</p> | <p>Very good understanding.</p> <p>The UBC has been advocating for recognition and proper conservation management of all Threatened Ecological Communities.</p> <p>UBC Committee members have been active in the community nomination of TECs including 'Banksia Woodlands of the Swan Coastal Plain.</p> <p>UBC continues to be disappointed in the lack of will of land managers and the State Government to follow implement the conservation advices for TECs, in short:</p> <ul style="list-style-type: none"> • <i>PROTECT the ecological community to prevent further loss of extent and condition;</i> • <i>RESTORE the ecological community within its original range by active abatement of threats, re-vegetation and other conservation initiatives;</i> • <i>COMMUNICATE WITH AND SUPPORT researchers, land use planners, landholders, land managers, community members, including the Indigenous community, and others to increase understanding of the value and function of the ecological community and encourage their effort in its protection and recovery.</i> <p><i>... Actions inconsistent with these recommendations that are likely to significantly affect the ecological community should not be undertaken.'</i></p> |
| <p>9. How would you describe your understanding of the erosion issues that exist along the riverbank and foreshore at the Ashfield Flats?</p> | <p>Very good understanding.</p> <p>Members of the UBC committee and many of our member groups both work with their LGA and DBCA to care for, and advocate for local riverine &/or estuarine areas including the upper Swan River. We bring this experience to this submission</p> |
| <p>10. How do you feel about the following management options being implemented at Ashfield Flats?</p> | |

10a) Protect environmentally significant areas by restricting access using fencing.

Strongly agree

10b) Revegetate parts of the river foreshore that are eroding, to support foreshore stabilisation.

Strongly agree

10c) Use jute matting (natural material matting) in parts of the river foreshore that are eroding, to support foreshore stabilisation.

Strongly agree

10d) Use rocks in parts of the river foreshore that are eroding, to support foreshore stabilisation.

Strongly agree

10e) Installing fencing that directs access to portions of the riverfront where people can access the beach and water, whilst also supporting foreshore stabilisation

Strongly agree

Permanent fencing around the around TEC

10f) Ensure dog walking occurs outside areas of high environmental significance.

Strongly agree

Dogs and cats are a threat to native wildlife in watercourse reserves. It is inappropriate management to have dogs off lead. All dogs must be ON LEAD because of the detrimental effects they have on both native fauna and flora.



Maylands has some of the clearest, most enduring and least imposing signs printed on public shared paths.

11. Is there anything else you would like to tell us about management of the Ashfield Flats?

Comply with local, state, federal and international environmental legislation, agreements, policies, and guidelines that affect our urban ecology.



Legend

- i Site information
- Ashfield Flats Master Plan Boundary
- Threatened Ecological Community
- Drains
- Paths
- Boardwalk

BUSH FOREVER – Recognise the status as **Bush Forever – Site 214 Ashfield Flats, Bassendean/Ashfield** and an important part of the Comprehensive, Adequate and Representative (CAR) reserve system for the Swan Coastal Plain – and manage the area for this purpose..

Manage natural areas to retain and restore biodiversity values by:

- embracing the cultural significance of healthy waterways to Traditional Owners
- leaving undisturbed areas of riparian vegetation to maximise the ecosystem function
- controlling weeds, pests and introduced species
- increasing buffers by moving paths upslope
- rehabilitating the riparian area and adjacent landscape formations with local provenance species
- minimising contamination in-flow
- reducing and rehabilitating unofficial and access points
- controlling rubbish dumping
- controlling off path activity (eg mountain bikes, trail bikes)
- minimising sprinkler and fertiliser use.

Acid Sulphate Soils (ASS) and Possible ASS (PASS)

Apply the research from the hydrogeological surveys to prepare an ASS Management Plan to ensure prevention of Acid Sulphate Soils

development. Also, the ASS Management Plan must guide any proposals to disturb the soil.

Recreational impacts – Actively manage **detrimental impacts of fishing and other recreational activities** including canoeing/kayaking including:

- Pushing access paths thru sedge banks – that lead to increased erosion as well as become conduits for weeds.
- Dragging watercraft over the vegetation and thus damaging and weakening it.

Refer Swan Estuary Reserves Action Group (SERAG) article in UBC's Urban Telegraph – Summer 2023 page 10.

https://www.bushlandperth.org.au/wp-content/uploads/2017/11/UBT_Summer_2023_HR.pdf

Sheoaks – Because of the detrimental impact on the natural vegetation and the hydrology need to actively manage (by removal & poisoning) the woody weed, the **introduced sheoak *Casuarina glauca and hybrids**.

Refer to efforts of the City of Canning, DBCA, South East Regional Centre for Urban Landcare (SERCUL) and local urban groups Swan Estuary Reserves Action Group (SERAG) and Canning River Residents Environment Protection including on Lower Canning, Upper Canning and Pelican Point. Refer article in UBC's Urban Telegraph – Summer 2022 page 9.

https://www.bushlandperth.org.au/wp-content/uploads/2017/11/UBT_Summer2022.pdf

Extend buffers around the TEC and the foreshore vegetation to ensure their added protection. This includes moving paths.

Water for birds – UBC encourages the purchase and erection of 2 **elevated bird watering stations** from the Town of Victoria Park.

www.victoriapark.wa.gov.au/Environment/Bird-waterers.



Source: Town of Victoria Park

Enforcement – Public education and information is vital in developing and maintaining recognition and support for the plan's objectives but it must be accompanied by enforcement actions where necessary.

Community awareness & engagement – Continue to **highlight the importance of local natural areas and engage the community** in activities and programs that protect and enhance the environment.

Implementation – As with any plan, effective implementation relies on **ongoing maintenance and monitoring**.