



Submission lodged by the Urban Bushland Council WA Inc (17 October 2023)

Calling for a Public Environmental Review (PER) level of assessment by the Environmental Protection Authority (EPA)

Rockingham Industry Zone Undeveloped Land Derived Proposal Application

UBC submission based on EPA's [Statement of environmental principles, factors, objectives and aims of EIA - 4 April 2023.pdf \(PDF, 430.34 KB\)](#)

The significant factors which require formal assessment in a PER are:

- 1. Flora and vegetation:** Disturbance of up to 269 ha is a very large area. All flora and TECs present should be mapped with updated data - ie current survey data is needed. The flora data given is >15 years old. There may be endangered flora species present.
The area is very biodiverse and is rich in vegetation types and FCTs. The presence of the *critically endangered* Tuart forests and woodlands of the Swan Coastal Plain, and of the *endangered* Woodlands over sedgelands in Holocene Dune swales of the southern Swan Coastal Plain – both listed under the *EPBC Act* – requires that these TECs are to be protected to prevent further loss of their extent and condition.
In the RIZ there are 21 vegetation associations and 4 FCTs: Types 17, 19b, 29b, and 30c2. FCT 19b is listed as endangered under both state and federal Acts.
The proposal to clear 11.6 ha of TECs is very significant and requires formal assessment by the EPA. Notably this is also a 'Controlled Action' under the *EPBC Act*. These areas should not be cleared. The proposed offsets are contrary to the mitigation hierarchy as the **avoid** principle should apply – thus these TEC areas should not be cleared.
Retained TECs will suffer degradation and potential loss from surrounding industrial developments even with 5m wide buffers. See hydrology below.
- 2. Fauna:** There are many significant fauna species present and updated surveys are needed for formal assessment. The bushland provides foraging habitat for the endangered Carnaby's Cockatoo, and is habitat for the Southern Brown Bandicoot, Rainbow Bee-eater. Also the critically endangered Western Ringtail Possum may be present and this should be surveyed. Habitat for these significant species should be assessed and should not be cleared or disturbed.
- 3. Inland Waters:** The area is a wetland dominated landscape. There are 38 wetlands in the RIZ and 24 of these are in the proposed development area. This is a very high extent/number of wetlands. Of the 24 wetlands, 19 are Conservation Category Wetlands (CCW) with FCT 19b, and 5 are Resource Enhancement Wetlands. Also 5 wetlands have Tuarts present as a dominant tree

species. Suitability of this landscape for industrial developments is questionable. All wetlands require protection.

4. **Hydrology:** The report gives 2005 data which describes the shallow depth to groundwater being 0.9m to 1.7m in 2005. And also, that wetland water levels had dropped by 1m since 1992. Updated water and groundwater levels are needed.

The proposed land clearing and industrial developments will have a very significant impact on hydrology of the landscape (including groundwater flows) and on native vegetation. With shallow depth to groundwater, industrial developments are likely to include dewatering and this will significantly alter groundwater hydrology which will have significant impacts on vegetation. This must be formally assessed.

Each one of these significant factors alone requires a formal PER and they are also significantly inter-related. The provisions and requirements in the Strategic Environmental Assessment (SEA) in EPA Report 1390 are not adequate.