



**UBC Meeting Appeals Convenors 2pm Wednesday 1<sup>st</sup> November 2023**

**SUBJECT: Further discussion on the EPA's decision to 'not assess' (EPA decision s 38G (1)) Perth Surf Park Prinsep Road and Knock Way Jandakot City of Cockburn.**

PRESENT: Two UBC Committee Members.

**PREFACE:**

We request that in your Report to Minister Whitby you Include the information that three areas have been cleared and linked by cleared access tracks before the process of appealing the EPA's decision was finalised. The three areas are approximately:

- 1.) 17m X 30m
- 2.) 28m X 24m
- 3.) 22m X 19m

Conversion to hectares is 0.16 hectares plus the linked tracks.

The clearing would have been for access for machines to take core samples in three areas as part of a Wetlands Assessment. (Advice on Wetland Assessment from Officer of the Government)

**DISCUSSION POINTS:**

**1.) EPA's 'not assess' 'Explanation of decision'**

EPA's explanation of its decision to 'not assess' is not logical or authoritative. The high biological diversity of this site is not valued.

EPA statement 1: 'The vegetation has been impacted by historical clearing....'

When would this clearing have occurred and why? Why would taller trees within the area be harvested after 1974? Please note: GALT Geotechnics – '1974 Site is completely [sic] with native bushland' (p 10, 22 November 2021 (missing word 'covered'))

Trees 'thinned out' are more likely to have been taller trees and not Banksia species. The Banksia Woodlands with their intact understorey remain.

EPA statement 2: '(i) on-going degrading processes leading to large proportion of weeds and (ii) limited canopy connectivity'

*Weeds:* Because the area is weedy in parts and is in variable condition is not a reason to 'not assess'. The native vegetation area is 'significant'. If being weedy is a valid 'reason' to not assess, then almost no areas with native vegetation and weeds would be assessed.

(ii) *Limited canopy connectivity*: The canopy corresponds with the listing descriptions of the TEC of Banksia Woodlands of the Swan Coastal Plain. Trees at the site are Banksia trees (*B attenuata*, *B menziesii*, *B ilicifolia*); *Allocasuarina*; Christmas Trees; Paper-bark trees. In addition Tuart trees are present on site, and the fact that young tuarts are present indicates that the ecological community is healthy.

The UBC maintains that the canopy on the site **is** connected as evidenced by the bird community seen on two visits to the site – honeyeaters, parrots, a Hobbie and other small birds. In addition connectivity continues with the vegetated site north of Princep Road with its *Melaleucas*. Photo taken 24 October 2023. (See page. X)

As pointed out in the UBC appeal (p 2, 21 March 2023):

*The canopy of the Banksia woodlands is most commonly dominated or co-dominated by Banksia attenuata and/or B. menziesii. Other species may dominate some examples of the ecological community, for instance, B. prionotes .. or B. ilicifolia.....Other trees of a medium height may be present and include E tottiana..., Nuytsia floribunda, Allocasuarina fraseriana, ..'* (p 4 DCCEEW Banksia Woodlands of the Swan Coastal Plain – draft description and threats <https://www.dcceew.gov.au/sites/default/files/env/pages/0cbe29d5-b507-4276-b524-6f0c9a54fb5c/files/banksia-woodlands-swan-coastal-plain-draft-description-threats.pdf> ).

#### **Heights of Banksia species Ref Florabase**

*Banksia ilicifolia* - to 12 m

*Banksia menziesii* - to 7 m

*Banksia attenuata* – to 10 m

*Melaleuca preissiana* – to 9 m

*Eucalyptus gomphocephala* (Tuart) – to 40 m

*Nuytsia floribunda* (Christmas Tree )– to 10m

#### **2.) BW condition**

**'The condition of the Banksia woodland was rated as Good – Very Good condition'**. (p5, PGM Report).

The Banksia woodlands community is in danger of extinction, and all that remains must be retained and protected.

#### **3.) Objectives of the EPA Act**

The objectives of the EPA Act?

*It is the objective of the Authority to use its best endeavour:*

- a. *To protect the environment; and*
- b. *To prevent, control and abate pollution and environmental harm*

EPA Statement of Environmental Principles, Factors and Objectives

Banksia Woodlands needs to be protected. A site was selected and alternatives not considered. The community who care have lost faith in government processes.

**4.) Carnaby's Cockatoo/Forest RT Black Cockatoo/Rainbow Bee-eater/ Southern Brown Bandicoot/ Lerista lineata (endangered)**

If this proposal proceeds, habitat, food and shelter for each species will be diminished. The proposed capture of Quenda, (dense understorey perfect for them), reptiles and other non-listed species for relocation is probably moving them to an area that is already full. Habitat loss is what has caused threatened status.

**5.) Cumulative loss:**

The UBC is concerned about how much native vegetation is reserved in the vicinity and how much will remain. The UBC has heard of the possibility that Jandakot Airport may be decommissioned.

**6.) Wetlands:** The UBC promotes the value of wetlands that since colonisation, were considered sources of ill health and therefore filled in. If the Minister approves this proposal, there will go another wetland.

All wetlands are part of Noongar dreaming.

Has mapping been done on the extent of the site's wetland? State Environment Report 2007 stated that 80% of SCP wetlands have been lost, and 4 ha/day is still being lost. (Wetlandswa.files.wordpress.com) DBCA wetlands branch of 22 staff in 2013 now has only 2 staff. (2014 Wetland Conservation in WA: Past, Present and Future: Robyn Pickering and Philip Jennings)

**7.) Inland Waters:** The UBC did not make comment on Inland Waters in its Appeal but we do consider this aspect as extremely important. The groundwater of the Jandakot Mound 'is often close to the surface' and 'the aquifer supports extensive wetland systems and groundwater dependent vegetation'. (Dept of Environment Jandakot Groundwater Mound)

*'The Jandakot Mound also recharges the deeper confined aquifers found in the area, the Leederville and Yarragadee aquifers'.* The Jandakot Mound is directly recharged by rainfall. It is surely not appropriate for Perth's drinking water to supplement the water for the proposed Surf Park. The withdrawal of water from the Mound could have a devastating effect on adjacent wetlands including on North Lake.

**EPBC Public Portal:**

[Situated on 5.742ha site

**Cockburn Surf Park EPBC number 2022/09267**

Lodgement - Completed  
Validation - Completed  
Referral Decision - Completed  
Assessment - Not Required  
Final Decision - Not Required  
Post Approval - Not Required  
Completed - Completed

Site immediately north of Prinsep Road demonstrating connectivity.



Connectivity at the site looking south.  
Eucalypt beyond. Standing water in  
the foreground.

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