

METROPOLITAN REGION SCHEME AMENDMENT 1388/57 – WATTLE GROVE SOUTH. EPA REPORT AND RECOMMENDATIONS 1788

APPEAL

<https://appeals-system.appealsconvenor.wa.gov.au/createappeal/>

Introducing the Urban Bushland Council

The Urban Bushland Council WA Inc. (UBC) is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity. We are a voluntary community association with an active membership of more than 90 volunteer groups (each with their own local membership from 10-165 individuals) and an additional 100+ individual 'supporter' members – all with a common interest in conservation and protection of areas of urban bushland in WA. More details at <https://www.bushlandperth.org.au/>. We recently celebrated 30 years of advocacy for the protection of urban bushland.

UBC advocates 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.

UBC advocates for:

- Protection, conservation and active management of urban bushlands, wetlands and their ecological linkages
- Ending the clearing of native vegetation in urban areas
- Increasing tree canopy cover in urban areas to a minimum of 30 %
- More investment in urban bushland/ wetlands/ coastal heaths
- Better detection, control, reduction and management of threatening processes in urban bushland/ wetlands/ coastal heaths
- Urban planning that results in net positive vegetation outcomes and conserves biodiversity

UBC APPEAL

The UBC appeal is based on the grounds that the EPA did not fully consider critical information. Urban development in this area has the potential to further undermine inland water values, existing ecological linkages and wetland buffer zones identified by conservation science and community stakeholders.

CUMULATIVE IMPACTS: There is insufficient quantitative assessment of cumulative impacts from adjacent developments including Tonkin Highway upgrades, MRS Amendments 166 and 169, or previous stages of the MKSEA. We note that the EPA recommended against the City of Gosnells Amendments 166 and 169 proceeding, including concerns about cumulative impacts. Knowing that Amendments 166 and 169 are subject to Ministerial Statements (and likely to be implemented), the cumulative impacts must be even more critical in this southeast corridor. We also note that Section 5 of this report provides advice on the need for collaboration on information (especially hydrological information) and yet states:

While cumulative impacts to inland waters values by this amendment are not at a level that would warrant a recommendation not to implement the amendment,... (P21 – 22)

Given the concerns over the underpinning hydrological analyses, we believe it is more appropriate to recommend that the assessment be not recommended rather than impose conditions that will fall to other DMAs to implement.

The EPA did not appear to consider UBC's call for a **moratorium on rezoning** pending comprehensive ecological review and the development of a proper regional ecological strategy.

DEFERRING KEY ENVIRONMENTAL DECISIONS TO OTHER DMAS, LATER PROCESSES. The EPA's report defers key decisions to later stages of planning, missing the opportunity to set clear, enforceable environmental protections at the strategic level. This contradicts the precautionary principle and leaves too much to contemporary conservation planning standards, particularly in a landscape already suffering from fragmentation and hydrological degradation. It leaves critical decision making to agencies where their primary objective is not the protection of the environment.

YULE BROOK REGIONAL PARK: We thank the EPA for their consideration of UBC's proposal that there should be consolidation and protection of regionally significant bushland and wetland systems through the creation of the Yule Brook Regional Park. These linkages are not incidental; they're critical for hydrology, fauna movement, and genetic exchange.

UBC seeks

- Stronger up-front protection of environmental values, including no-go areas for development and secure buffers; meaning strategic landscape connectivity including retention areas and buffers that align across Wattle Grove South and Kenwick precincts.
- Re-assessment of the amendment with regards to cumulative impact, with more use of the precautionary principle where information is sparse.
- Consideration of public acquisition or reservation of key parcels of land to provide ecological linkages across and between sites and to secure the proposed Yule Brook Regional Park.
- strategic offsets be established at this Amendment stage (rather than at later stages in the planning process) to ensure ecological linkages and buffers are secured beyond the development footprint, contributing to broader landscape resilience.

UBC also seeks changes to conditions as follows:

- Inland waters: specifying buffers of 100 – 200 m to better protect GBSW
- Flora and Vegetation: that development occur in clusters, aiming to retain 30 – 40% of the existing native vegetation and maintaining corridors of vegetation
- Black cockatoo habitat: retaining high value trees, restricting lighting and fencing impacts to protect these endangered species

We believe these actions will help ensure that the Wattle Grove South amendment does not further erode one of the Perth region's most ecologically significant corridors.

Thank you for the opportunity to comment.

Chairperson

Urban Bushland Council WA Inc
City West Lotteries House
2 Delhi Street
West Perth WA 6005
ubc@bushlandperth.org.au
www.bushlandperth.org.au