14 August 2025

**Jandakot-Treeby District Structure Plan**

**Submission by the Urban Bushland Council WA (Inc)**

<https://haveyoursay.dplh.wa.gov.au/jtdsp>

Do you support the Draft District Structure Plan?

* No – Not in its current form. It needs further work carried out and substantial changes prior to approval.

The WA Government has identified the Jandakot-Treeby area adjacent to the Jandakot Airport in the City of Cockburn for urban expansion.

The Urban Bushland Council WA (UBC) has major environmental concerns about the DSP in its current form as the proposed housing is inconsistent with state and local planning policies regarding sustainable development, especially because a huge amount of native vegetation and tree canopy will be lost.

The City of Cockburn is one of the most important areas in the Perth-Peel region for black cockatoos[[1]](#footnote-1), while at the same time ranking in the lowest quartile of 140 local Australian tree canopy coverages (11%) in Australia[[2]](#footnote-2). There are inconsistencies in the plan documents on how much native vegetation and/or black cockatoo habitat will be retained, although the DSP says at least 85 hectares of black cockatoo foraging habitat and a longtime roosting site may be lost.

The DSP is also vague on how the Bush Forever sites and the ecological corridors in the area will be impacted. There is the suggestion to develop 10.76 hectares of BF 389 that has been previously cleared for sand extraction – but no offset is proposed.

Most of the site occurs on the Bassendean Central and South Vegetation Complex. Although it is fairly well represented locally, only 1.86 % of the original extent of the Complex is reserved in secure (IUCN Category I-IV) reserves. And with less than 26% of the original extent on the Swan Coastal Plain remaining, the entire, regional-scale ecosystem is on a trajectory of ecological collapse[[3]](#footnote-3).

What is extremely worrying is the lack of consideration for cumulative impacts on the local biodiversity and human quality of life due to recent development in the area that has resulted in a huge amount of green space and endangered banksia woodlands being lost. This includes the Treeby housing development, the closure of the Glen Iris Golf Course for housing, the expansion of the Jandakot Airport (which involved clearing over 100 hectares of the best remaining examples of banksia woodland on the Swan Coastal Plain) and the proposed surf park (which will also destroy part of a Conservation Category Wetland). The cumulative impacts of these actions should be considered and included in the DSP.

Sustainable development means striving to retain all native vegetation and/or realise net positive gain in native vegetation. It is not stated in the plan, but it is inferred that there will be a huge net loss of vegetation, exacerbating urban heat island effects which impacts black cockatoos and people’s quality of life, including housing and running costs, and health and well-being. Apart from noise concerns due to the airport, these UHIE issues need to be examined at this stage, and because they have not been identified to examine later.

Over half of the site (296 ha) is shown as residential development. Another large portion (220 ha) is subject to further investigation as rural residential (with the assumption of developing between 10-25% of the land). But it is not clear if this could change. Furthermore, only 5.76 ha of Public Open Space, 9 ha of District Open Space and 13.24 ha *Potential Future* Regional Open Space (total of 28 ha) had been identified. That is only 4.8% POS of the entire development area – well below the recommended best practice in the state of at least 10%.

The site is currently zoned as a Priority 2 (P2) Public Drinking Water Supply Area (PDWSA) that currently allows rural land uses, including rural residential. The site must be rezoned to Priority 3 (P3) to allow urban development. This requires that hydrological assessments be conducted to demonstrate that there is no risk of impact to public drinking water quality or quantity (e.g. by avoiding any contamination hazards from urban development). This assessment should be conducted prior to the DSP being approved.

The Urban Bushland Council WA (UBC) recognises the need and the potential of the Jandakot–Treeby District Structure Plan (DSP) to contribute to Perth’s growing housing demand and urban development targets. UBC also understands that the DSP is strategic in nature and cannot deal will all planning issues at this stage. However, the chief aim of the DSP should be to develop in a sustainable manner – which is now recognised as preserving all of the remaining native vegetation and providing at least 30% tree canopy cover. This would go a long way in helping to conserve the black cockatoos and local biodiversity. However, the DSP in unclear as to whether these outcomes will be achieved and there are too many unanswered questions to be left to later - the impacts of the current proposal may result in serious environmental harm to people and wildlife that cannot be reversed.

The following environmental and public health issues should be comprehensively addressed before the plan is approved:

1. **Protection of Black Cockatoo foraging and roosting habitat**

The DSP fails to consider the cumulative impacts on the black cockatoos that are resulting in net habitat loss and declining populations.

Actions:

* The black cockatoo habitat should be clearly mapped and identified.
* There must be a covenant put in place to protect the roosting site with adequate buffers.
* Ensure all planning and decision-making related to black cockatoo habitat and conservation involve explicit consideration of the risks from cumulative impacts, including future risks, and management of these risks.
* Retain foraging habitat as a priority, especially endangered banksia woodlands. Ensure the City’s planning and regulatory decisions and actions do not lead to net loss (and preferably, achieve net gain) of food resources for black cockatoos in the vicinity and the City of Cockburn.
* Identify and protect significant trees on private property by providing conditions and/or incentives (such as compensation).
* Prioritise the planting of black cockatoo food trees in the new development wherever possible.

1. **Protection for Bush Forever Sites**

A plan must be drawn up to protect the Bush Forever sites. The 10.76 ha of BF 389 must either be restored or another location in the vicinity chosen as an offset and restored.

1. **Protection of Remnant Vegetation**

Cumulative impacts, locally and regionally, are resulting in death by a thousand cuts and putting at risk the survival of the unique bushland ecosystems of Perth. State planning policies are out of date with respect to preserving biodiversity, e.g. the Bush Forever policy strives only to protect 10% of the urban bushland ecosystems when it is globally accepted that a minimum of 30% of an original ecosystem must be protected to preserve it. In the past, there has been an acceptance of a trade-off of clearing nature for housing, but we have reached a point that this practice is no longer viable or safe. We need to build resilient and healthy cities that protect our amenity, sense of place and wildlife.

Hence, the DSP should:

* Identify and map the native vegetation on the site.
* Ensure no Threatened Ecological Communities or threatened flora is cleared.
* Conserve all native vegetation on Bassendean Central and South Vegetation Complex in good or better condition.
* Ensure no net loss of locally and regionally significant vegetation.
* Retain and enhancing habitat linkages and corridors.
* Apply a minimum 50 m buffers to all Conservation Category Wetlands and other sensitive environmental assets.
* Require a local biodiversity offset plan for any unavoidable clearing.

1. **Consideration of Cumulative Effects of Recent Development**

The cumulative effects of recent development in the area should be considered together with the proposed urban development to determine the true impacts on native vegetation conservation, local biodiversity and black cockatoos. Also to be investigate are the cumulative urban heat islands effects and the associated impacts on the quality of life. Consideration should be given to the housing type and density to protect green space and the local biodiversity that is being lost. This kind of strategic thinking should be included in the DSP. If the conservation of local biodiversity is not integrated at the onset of the project, it will not happen.

1. **Tree Canopy Cover, POS and Urban Heat Island Effects**

The advice in one of the state’s leading strategies on urban development, Perth and Peel @3.5 Million, is clear and should be followed: “*Enhancing the urban forest and increasing tree canopy cover is the most efficient and economical way to reduce the effects of urban heat island in communities*”.

It would be wise and practical to set tree canopy targets at this stage. The City of Cockburn Urban Forest Plan 2018-2028 states that it is: “*important that an agreed minimum level of canopy cover be established early in the planning process”.*

Reduced vegetation cover and increased impervious surfaces raise risks related to public health and wellbeing, including death from heat waves, and coping with increased stress and anxiety. People are experiencing a deep sense of loss from watching nature being destroyed and being cut off from nature. The DSP should ensure:

* Local structure plans include a tree canopy target of 30% per precinct by 2040 to reduce urban heat island effects.
* Public Open Space should be increased to a minimum of 10% and designed for multifunctional purposes: stormwater management, passive cooling, biodiversity, and recreation
* Follow the advice given in the State Public Health Plan 2025-2030 and “*ensure public health risks are considered and addressed in planning and development policies and approval processes to facilitate healthy living and minimise impacts from public health hazards*”.

1. **Determine whether the rezoning of P2 to P3 PDWSA will meet the environmental criteria to protect the groundwater level and quality**
2. **Identification and Protection of all Conservation Category Wetlands**

The category of the wetlands shown in the vicinity of the DSP are not up to date, and there are Conservation Category Wetlands (CCWs) that have not been identified in the maps provided. These maps should be updated and all CCWs identified and mapped to ensure their protection.

For example, DWER has identified that the wetland on Prinsep Road (UFI 6652) has the properties commensurate with a CCW as per the current available data[[4]](#footnote-4). This wetland should be clearly shown on the map as a CCW and that part of it is imminently to be cleared – pointing out that clearing any part of a CCW is against the principles of sustainable development.

1. **Air Quality and Noise Management**

The proposed development is within proximity to Jandakot Airport and the Kwinana Freeway—both significant sources of air and noise pollution. People living in these suburbs may have a lower standard of living with their mental health and wellbeing being affected because of the loss of nature and costs of living to mitigate living with airport noise and using forced ventilation rather than natural ventilation. The DSP should identify these risks for later examination and ensure:

* Noise levels are acceptable for a good quality of living in which people can still enjoy the outdoors and interacting with neighbours
* All dwellings within noise-affected zones meet Australian acoustic design standards for aircraft and road noise.
* A noise mitigation plan is implemented during construction and subdivision to limit impacts on future residents.
* Air quality monitoring is established, particularly in areas near major roads and industrial activity.
* A strip of native vegetation and trees where it currently exists along the airport boundaries should be left intact and enhanced to create a visual buffer from the development, reduce noise and act as an ecological corridor.

**Conclusion**

UBC cannot support the Jandakot Treeby DSP until these changes are carefully considered and included to ensure that this new housing development is done in a truly sustainable manner - helping to conserve nature and the local biodiversity.

Chairperson

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1. City of Cockburn [Black Cockatoo Conservation Action Plan](https://www.cockburn.wa.gov.au/getattachment/bb50d6fc-69cb-48bd-a118-7cf4ecba646d/attachment.aspx) 2023 [↑](#footnote-ref-1)
2. City of Cockburn [Urban Forest Plan](https://www.cockburn.wa.gov.au/getattachment/0e4dab40-d4bc-4b73-8466-61af00d2326e/attachment.aspx) 2018-2028 [↑](#footnote-ref-2)
3. The flora, vegetation and wetlands of Lot 123 Mortimer Road, Casuarina in Western Australia—an independent assessment, City of Kwinana 2021 [↑](#footnote-ref-3)
4. CLEARING PERMIT Granted under section 51E of the Environmental Protection Act 1986, Permit Number: CPS 10068/2, File Number: DWERVT11948 [↑](#footnote-ref-4)