

**DRAFT CARABOODA DISTRICT STRUCTURE PLAN**

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

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**Via online survey**

**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 our areas of native vegetation in urban areas
- Better detection, control, reduction and management of threatening processes in these areas
- Urban planning that results in net positive vegetation outcomes and conserves biodiversity

**UBC Submission**

The UBC congratulates the Environmental Protection Authority (EPA) and the WA Planning Commission (WAPC) on the work undertaken to create and largely follow the strategic advice for the Carabooda DSP. UBC commends the inclusion of much of the EPA's recommendations into the DSP but believes that better protection of the environment would be achieved through the following:

1. securing a stronger north-south corridor with greater attention to connectivity
2. designing in more 'avoid'.
3. reducing fragmentation by positioning roads on the edges of the conservation areas.

UBC also cautions care around the impact on water and the need to ensure there is no repeat of the environmental consequences now being seen in Brabham and Dayton

**Securing a stronger north-south corridor with greater attention to connectivity**

UBC acknowledges that there is good east-west ecological linkage across the site and recommends that additional consideration be given to strengthening the conservation values of the north-south connectivity. This includes Increase corridor width, avoiding road intrusions or narrow pinch points and treating the corridor as core habitat, not residual space.

**Designing in more 'AVOID'**

UBC recognises that there is a relatively high retention of native vegetation in this DSP. This is to be commended and given the great extent of clearing everywhere else on the Swan Coastal Plain, it is necessary to protect the remaining biodiversity in our city.

However, UBC encourages the WAPC to implement the retention recommended by the EPA of Areas H-M. The EPA identifies Areas H, I, J, K, L and M (Figure 4 in EPA advice) as meeting regional significance criteria but not being fully protected in the DSP. This proposal should not be planning the clearing of Threatened Ecological Communities, especially ones that are critically endangered as those here.

UBC also calls for further reduction in the proposed clearing of black cockatoo foraging habitat, and for stronger protection of nesting and roosting trees. It is important that conservation boundaries be expanded to capture clusters of high-value trees, even if isolated and to retain canopy corridors through development areas rather than relying solely on edge conservation.

The EPA has explicitly stated that adjustments to density and built form can achieve these outcomes without reducing housing yield.

#### **Reducing fragmentation by positioning roads on the edges of the conservation areas.**

Another component of 'avoid' is to avoid fragmentation of the area's native vegetation by ensuring that the road network is aligned along the edges of the conservation areas and not through them. Biodiversity benefits when edge effects are minimised.

The designing of the roads should not be deferred; they need to be placed for best environmental outcome at the very start of the planning process. The intention of the planning should be to do least harm to the continuing survival of the black cockatoo species. The DSP needs to retain safe flight paths, effective foraging range and long-term habitat viability for black cockatoos by positioning the roads for the best environmental outcomes possible. This is consistent with the EPA's advice.

Improvements to road design in the DSP should include re-aligning roads to conservation edges, consolidating crossings, implementing narrow road reserves through sensitive areas, committing to canopy continuity and ensuring that additional road crossings can be implemented in later stages of development.

#### **Water**

Experience in other Perth fringe developments (e.g. Dayton and Brabham) demonstrates that groundwater rise and flooding impacts can emerge years after development, even where initial assessments considered risk to be low. These flooding events are serious local concern to some of UBC's member groups.

The District Water Management Strategy (Pentium Water) acknowledges that redevelopment of the DSP area is likely to result in rising groundwater levels due to reduced abstraction and increased infiltration following urbanisation. While current separation to groundwater is substantial and immediate risk is considered manageable, key uncertainties remain:

- robust regional and local groundwater modelling has not yet been completed,
- groundwater trigger levels and adaptive management responses are not defined at DSP stage,
- long-term impacts on external receiving environments (including Lake Nowergup) are not yet fully quantified.

Strengthening the DSP with earlier groundwater modelling commitments, defined trigger levels, and adaptive management provisions would align with the precautionary principle and reduce long-term environmental and community risk.

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