



29<sup>th</sup> March 2026

Data Centre development proposal (DA-6/2026)

Online submission closing date 30<sup>th</sup> March 2026

Lots 14 & 15 Stirling Crescent, Hazelmere WA

UBC Submission to Environmental Assessment Report – Western Environmental - 28 May 2024.

Dear City of Swan Planning Department Officers,

The Urban Bushland Council WA Inc. (UBC) is pleased to present this submission in response to your invitation to address the issues of relevance to us.

Our organisation is a voluntary community association of approximately 90 member groups (each with their own local membership from 10-165 individuals) – all of which have a common interest in the conservation of urban bushland and wetlands. UBC is an incorporated, not for profit organisation registered as a charity.

<https://www.bushlandperth.org.au/>

We are the key community organisation in WA providing a public voice on **the need for retention of what remains of our urban bushland and wetlands which is also critical for a healthy and prosperous future**. We advocate 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 – many working in close collaboration **with your department** and their local council.

The Urban Bushland Council reject the location of the proposed data centre (DA-6/2026) for the following reasons:

- 1.) proximity to the Helena (Mandoon) River.
- 2.) proximity to a Conservation Category Wetland and the whole site being a wetland.
- 3.) wildlife Nature Link disruption
- 4.) contrary to the Mandoon Bilya Riverpark project to restore the conservation, landscape and sense of place values.
- 5.) Aboriginal sites/heritage.

**1.) Only 40 m from the Helena River, a sensitive environment.**

'The Site is situated within the Helena River catchment...' (p10 Environmental Assessment) and 'The Site is adjacent to a floodplain control area...(DWER-014 and Floodplain Areas (DWER 020))...'

The site is only 40 metres from the river. It is accepted advice that a river buffer be 50 metres but the buffer 'may be larger'.

A Department of Water 2006 document states that 'Buffers should be progressively widened in proportion to reduced vegetation cover (Vegetation buffers to sensitive water resources).

The site and the proposal is in the wrong place and is contrary to SPP7.0 the Built Environment to protect landscape, sense of place and will reduce ecological function. (Kumming/Montreal, International Agreement Dec 2022). Our International signatory to this agreement is to strengthen ecological function and return biodiversity.

## **2.) Proximity to a CCW and the whole site mapped as MUW**

A Conservation Category Wetland is mapped and the whole site is mapped as Multiple Use Wetland (Fig 5 Western Environmental). This is a sensitive hydrological environment with shallow ground water – from 1 – 2metres.

We believe the wetland buffers have been reviewed by DBCA and deemed to be insufficient to deal with extreme weather events and provide adequate protection of the wetland conservation values. The hydrology of water infiltration and sediment flow from the escarpment along the Helena River to the Swan River requires more than 50m. The setback for the data centre is even less than the outdated 50m. We strongly support the review of wetland buffers by DBCA to be endorsed as accepted policy.

The proposed development site is less than 50 m from the school and other sensitive sites which could already be impacting the conservation values of the site from loss of available surface area and riparian vegetation for hydrological purposes.

## **3.) Urban Wildlife Connectivity through Nature Links.**

The team led by Dr Jane Chambers, Murdoch University and NatureLink Perth have mapped linkages that follow the least cost for plants/animals to safely exist in and through the landscape. Water courses are an obvious and recognised nature link to maintain. UBC strongly support the increased protection by legislation of ecological linkages as mapped by Del Marco and Renata Zelinova for WALGA and now reviewed by Naturelink Perth.

This Nature Link is the only continuous link in the area. It has been demonstrated that Black Cockatoos follow vegetated areas rather than flying over cleared land. The site provides foraging habitat for Carnaby's and Forest Red-tailed Black Cockatoos. Carnaby's Cockatoos in particular, have been admitted to care centres starving. Rather than clearing the whole side, retention and replacement of black cockatoo habitat is required in line with Black Cockatoo Recovery.

## **4.) Mandoon Bilya Riverpark**

The UBC is aware of the work done to establish the Mandoon Bilya Riverpark, a 250hectare river restoration from Guilford to Helena Valley. This new model of river catchment management is part of the 2029 Perth Bicentenary. This project has been described as transformative and as a permanent legacy. Lots 14 and 15 immediately border the proposed

Mandoon Bilya Riverpark. The proposed placement of the Data Centre is incompatible with the environment.

The City of Swan, endorsing the work to support the Mandoon Bilya Riverpark, can be a very significant voice for the Helena River. The opportunity to increase tree canopy in the City and at the same time to restore ecological function is to be commended.

### **5.)Aboriginal Heritage**

*'The Helena River and its adjacent valleys and floodplain is highly significant to Aboriginal people.'* (p3 DBCA Tributary Foreshore Assessment Helena River (Mandoon). October 2017)

The Environmental Assessment records that 'the entirety of the Site intersects with a registered site associated with Helena River (ID 3758' ...)

The Helena River site 'Type' is 'Ritual/Ceremonial; Narrative; Repository/Storage Place.(Aboriginal Due Diligence Assessment' - Urbis prepared for GreenSquareDC 3 May 2024)

As is stated of the 'Swan and Canning Rivers': [that includes the Helena River – see Figure 4] *'The place is highly significant to the Western Australian Noongar population as a focus point for ceremony, spiritual life and subsistence during prehistory through to the present day'.*

Further we read that: *'The Helena River was used by the Noongar as a 'moort bidi', an important migration route for Noongar people going to and from Guilford where corroborees were performed.'* and:

*Despite the dispossession of traditional land by European settlers, Aboriginal people living in and along the Helena River continued their cultural practices, as evident by the retouched glass artefacts found in the area.*

The Urbis Assessment states: *'The hydrology of the subject area is therefore indicative of the potential for Aboriginal sites and places.'* (Hydrology 2.3)

The other Registered Site that intersects the Site is 4006 Hump Paddock and its 'Type' is 'Artefact Scatter'. (p8)

Conclusion:

The UBC strongly supports the submissions of the local Environmental Groups, many who have worked tirelessly as volunteers for decades to give wildlife the best chance of survival and bushland the resilience to regenerate. These include:

- the Lower Helena Association Inc (LHA), and
- Bibbul Ngarma Aboriginal Association

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