



25 February 2026

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CPS 11420/1

Proposed development of a waste processing and handling facility

Application for public comment.

Remondis Australia Pty Ltd.

Due 4 March 2026.

Dear Officer

Thankyou for the oppportunity to comment.

The Urban Bushland Council WA Inc does not support Remondis's clearing application CPS 11420/1.

Ecological linkage and fragmentation – cumulative impacts

Among the UBC's first impressions in looking at this proposal is the importance of the site as an ecological linkage. By its very shape, the area would be a corridor along which birds such as black cockatoos could access other areas. Dr Kris Warren of Murdoch University has demonstrated that Carnaby's Cockatoos prefer to fly over vegetated areas and avoid cleared areas. Yangebup and Kogolup Lakes, part of Beelihar Regional Park lie to the west, and to the north-east is Jandakot Regional Park...all black cockatoo habitat.

The 'vegetation is fragmented...' because of the extent of clearing over the Jandakot/Treeby areas. The cumulative impacts of clearing are significant. Recent clearing has included:

- Perth Surf Park
- Treeby housing development
- Closure of the Glen Iris golf course for housing
- Proposed Jandakot/Treeby investigation areas for Urban development (proposed to rezone approximately 580 hectares from Rural-Water Protection to Urban – at this time it is unknown how much banksia woodland and tree canopy will be lost if this rezone proceeds.)
- Development for light industry in Jandakot.

There is no question that over-clearing has occurred in and around Jandakot and linkages have been lost.

The Delegated Officer assessing the then proposed and adjacent Surf Park stated:

'The application area represents a larger-than-average remnant within a highly modified and fragmented part of the ecological community's range.' (Delegated Officer's comment on Surf Park proposed development)

The UBC disagrees with PGV's advice relating to Principle (e) *Vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.*

We advise that the significance of habitat and the cumulative impact of loss of vegetation on this site is reevaluated. If this is not possible we suggest that the proposal be referred to the EPA, as part of a 'significant proposal.'

Banksia Woodlands TEC

The UBC does not consider the statement in PGV's Report (page 18 Flora and Vegetation) is satisfactory. The statement is:

'Of the TECs and PECs identified in the database search several buffered occurrences of the Banksia Woodlands of the Swan Coastal Plain ecological community are mapped on the site, however the occurrence confidence for each is not certain'.

PGV states that the vegetation dominated by Banksia is in Degraded condition and therefore is not part of the TEC.....and is *'not contiguous with a larger patch'*. Had the site for the Surf Park not been cleared, (decision made *'on balance'*) this site would have been contiguous with The Banksia Woodlands community or nearly so. In any event Banksia woodland should not be cleared.

Tuart Tree

Individual tuart trees are significant. The proposed 2 m radius buffer is extremely inadequate and the UBC finds it difficult to understand how this 2 m radius buffer can be considered 'appropriate'. The usual practice for a buffer may be based on the tree's trunk diameter – 'typically 12 times the Diameter at Breast Height'. This often extends beyond the canopy drip line. At 2 m radius, the structural root zone may be impacted by building close to the Tuart tree.

Vegetation Complex

The vegetation complex on the site is the Bassendean Complex - Central and South. According to the Environmental Protection Authority, this complex within the Perth-Peel Region, has only 1.5% left from the original in secure conservation. (p113 Perth and Peel @ 3.5 Million, July 2015)

PGV's Report states that 'Approximately 26.9%. of the pre-European extent of the Bassendean Complex-Central and South remains on the SCP (DBCA 2018)'. (p23 *ibid*) Like for like is not being compared here (SCP versus Perth and Peel area) but more recent data of how much remains would be informative.

The EPA's target of protecting at least 10% of each vegetation complex in constrained areas, is insufficient to protect the health and viability of a complex and is unsustainable.

This vegetation complex should not continue to be cleared.

Wetland:

Dr van der Moezel conducted a 'Detailed Survey' (Flora and Vegetation) on 12 September 2025, but *'the north-western part of the site was inundated at the time of the survey so was not traversed'*. (p5 *ibid*)

The inundation over the north-western part of the site is said to be because of the unseasonally wet winter. However, as stated and shown in PGV's Flora and Fauna Report (p 4 and Plate 5), mapping shows this is part of a Multiple Use Wetland. As around 90% of wetlands in the metropolitan region have been cleared, it is important to protect what is left, even if not in the top category. The wetland that was present at the Surf Park site had values commensurate with a Conservation Category Wetland and its loss by clearing was profound.

Black Cockatoos, Quenda

Over 2025, Carnaby's Cockatoos have been admitted to hospitals (Perth Zoo, Murdoch University and Kaarakin) because they are starving. Every source of food and habitat is significant to this species that has suffered from clearing (pines plantations and bushlands).

PGV states that Carnaby's Cockatoo at the proposed site is 'possible'. From UBC's experience of the Surf Park proposal site, Carnaby's Cockatoo was present there and we suggest that that species would be present in the banksia trees at this site. There is not enough food to sustain the populations of Carnaby's Cockatoos now. Results of the Great Cocky Counts have shown that the Carnaby's population is continuing to decline with the two main causes being loss of foraging and nesting habitat.

PGV state that Quenda are possible. With the loss of so much habitat the UBC suggests that the presence of Quenda is almost certain, as Quenda were present at the Surf Park site.

Remondis's Jandakot Resource Recovery Facility

We note that Remondis's Jandakot Resource Recovery Facility is at 39 Cutler Road Jandakot, adjacent to the proposed site, so approval for clearing and development would be highly valued by the company. The UBC also notes that Remondis's on-line site - redmondis.com.au - states that *'we do everything in our power to protect the environment, prevent climate change and reduce our carbon footprint.'*

The balance between the exploitation and conservation of nature has been completely lost in this area. The clearing of this site goes against sound sustainable development and conservation practices.

The government should reject this proposal and instead place a conservation covenant over this land to protect it in perpetuity for our wildlife, health and future well-being.

Yours sincerely

Christine Richardson, UBC Chair

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