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DRAFT AMENDMENT 1 TO THE NORTH ELLENBROOK (EAST) DISTRICT STRUCTURE PLAN

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

Submission Opening Statement

The Urban Bushland Council supports the intent of Amendment No. 1 given that it seeks to increase protection of native vegetation and black cockatoo habitat within the North Ellenbrook East District Structure Plan area. The additional local reserves and potential local reserves are a positive improvement on the approved District Structure Plan.

However, the amendment remains inadequate unless the proposed protections are strengthened and made binding. UBC seeks protection of the maximum amount of remnant native vegetation, optimal retention of Carnaby’s black cockatoo foraging habitat, and groundwater management arrangements that do not cause medium-term environmental harm once urban development proceeds.

North Ellenbrook East is a large urban expansion area in a sensitive landscape. It contains Bush Forever land, remnant native vegetation, Banksia woodland values, black cockatoo foraging and habitat trees, wetland systems, Sawpit Gully, shallow groundwater and potential ecological linkages to surrounding bushland and reserves. The amendment should therefore be assessed not only as a land-use planning proposal, but as a long-term test of whether urban development can occur without cumulative loss of biodiversity and hydrological damage.

Native vegetation and local reserves

UBC supports the additional potential local reserves but submits that they should be treated as minimum conservation commitments, not negotiable placeholders. The proposed “Potential Local Reserve – Black Cockatoo Foraging Habitat” areas should be converted into firm local reserves unless an independent ecological assessment demonstrates that any alternative location provides a clearly superior biodiversity outcome.

The amendment should protect the maximum amount of remnant vegetation, including vegetation that may be small, degraded or fragmented but still ecologically important. Small patches, scattered mature trees, paddock trees, roadside trees, sparse Banksia patches, Marri, Jarrah, Hakea and other food resources may all contribute to black cockatoo foraging and movement through a future urban landscape. These features should not be dismissed; they all matter.

Future local structure plans should be required to map all remnant vegetation, habitat trees and black cockatoo food resources before urban design is finalised. This mapping should inform road layouts, school sites, drainage corridors, public open space and subdivision design. Vegetation protection should occur at the front end of planning, not after roads, lots and fill levels have already locked in clearing.

Black cockatoo habitat and the City of Swan Conservation Action Plan

The City of Swan is one of the most important areas in the Perth-Peel region for black cockatoos, with some of the largest, most consistently used roost sites for all three species. There is also important black cockatoo foraging habitat in the City's reserves and green spaces.

UBC proposes that the City of Swan Black Cockatoo Conservation Action Plan should be explicitly applied to North Ellenbrook East. The Conservation Action Plan identifies retention of existing food resources as the highest priority, because replacement planting creates a food gap of many years and may not replace the value of existing habitat.

The amended DSP should therefore require no net loss and preferably net gain of black cockatoo food resources across the DSP area. Each local structure plan should include black cockatoo habitat accounting showing habitat retained, cleared, restored and created. This should include not only mapped high-value habitat but also scattered food trees and stepping-stone habitat.

Carnaby's black cockatoos require functioning feeding habitat within daily movement range of roosts. Future planning should therefore include roost and movement analysis, habitat corridor planning, and protection of food resources within the local foraging range. The retained habitat network should link Bush Forever Site 13, Bush Forever Site 300, Twin Swamps / Bush Forever Site 400, Ellen Brook Nature Reserve, Sawpit Gully, wetland buffers, school sites, local reserves and street-tree networks.

The Council's consideration of the Conservation Action Plan is also relevant. The City has recognised the need for black cockatoo support activities, community engagement and practical implementation. North Ellenbrook East should be a test case for implementing that plan through binding planning requirements, not another development area where habitat loss is managed after the event.

Groundwater, wetlands and water management

UBC is particularly concerned that the amendment relies heavily on future local structure planning and local water management plans to address groundwater and drainage. This is not sufficient in a landscape with shallow groundwater, sand-over-clay conditions, wetlands, waterways and proximity to sensitive reserves.

The 2007 North East Corridor Urban Water Management Strategy provides an important benchmark. It recognised that urbanisation changes the hydrological regime and that the corridor contains shallow groundwater, waterlogged palusplains, wetlands, waterways, groundwater-dependent ecosystems and nutrient pathways. It required early water planning, catchment and sub-catchment management, maintenance of pre-development hydrology where practicable, detention or retention of runoff close to source, protection of wetlands and careful control of subsoil drainage.

Recent experience in Brabham, Dayton, Henley Brook, West Swan and Caversham demonstrates that these risks are not theoretical. Residents have reported chronic flooding, rising groundwater, impacts to rural properties, tree deaths and concerns about piecemeal drainage planning across multiple developments. Parliamentary answers also indicate that groundwater levels across the investigation area rose significantly between 2010 and 2023 and that responsibility for local drainage is largely left with local government once development has occurred.

For North Ellenbrook East, groundwater and drainage must therefore be resolved before urbanisation proceeds, not simply deferred. Before Urban Deferment is lifted or local structure plans are approved, the

WAPC should require current district-scale groundwater and surface water modelling, release and consideration of the North-East Corridor / Swan Valley groundwater investigation, enforceable Controlled Groundwater Levels, monitoring bores, public reporting, adaptive management triggers and clear funding/responsibility arrangements.

The amendment must demonstrate that development will not worsen groundwater levels, waterlogging, flooding, nutrient export, wetland stress, tree decline or ecological harm to adjoining land, Sawpit Gully, Ellen Brook, Bush Forever sites, Twin Swamps Nature Reserve, Ellen Brook Nature Reserve or retained vegetation.

Roads and infrastructure

Any local road connection to Ellenbrook, grade-separated rail crossing, Tonkin Highway interchange works or associated road infrastructure must be designed around environmental constraints, not through them. Infrastructure should not be allowed to reduce, fragment or undermine proposed local reserves or potential local reserves.

Road design should avoid native vegetation, black cockatoo habitat, habitat trees and wetland buffers wherever possible. It should also apply black cockatoo safety measures, including avoiding food plants in medians, setting food trees back from roads, designing drainage to prevent roadside pooling that attracts birds, and monitoring vehicle-strike risk.

The Tonkin Highway interchange and Lot 110 require scrutiny. Habitat areas should not be presented as conservation gains if they are likely to be removed or compromised by later transport infrastructure.

Previous submissions

UBC's 2025 submission on MRS Amendment 1411 raised concerns that remain directly relevant to this DSP amendment and are repeated here. Environmental protection should not be deferred to local structure planning where it can be weakened by later road, drainage, school-site and subdivision design.

The amendment should secure ecological linkages between Bush Forever sites and retained vegetation, provide buffers to Bush Forever, wetlands, TECs, threatened flora and other ESAs, and require assessment of every mature tree for black cockatoo, canopy and habitat value.

Baseline groundwater data should be collected and publicly reported before any further clearing, filling, dewatering or subsoil drainage works.

Transport infrastructure, including the Tonkin Highway interchange, local road connections and rail crossing, should include fauna-sensitive design and wildlife crossings where appropriate.

Requested modifications

UBC requests that the amendment be modified or conditioned to require:

1. firm reservation of all additional local reserves and potential local reserves unless an independent assessment demonstrates a clearly superior ecological outcome;
2. protection of the maximum amount of remnant vegetation, including small patches and scattered food trees;
3. no net loss and preferably net gain of Carnaby's black cockatoo food resources;
4. mandatory implementation of the City of Swan Black Cockatoo Conservation Action Plan;
5. black cockatoo habitat accounting at every local structure plan stage;
6. roost, foraging-range and ecological linkage analysis;
7. current district-scale groundwater and drainage modelling before Urban Deferment is lifted;
8. enforceable Controlled Groundwater Levels, monitoring, public reporting and adaptive management triggers;
9. protection of wetland cores, buffers, Sawpit Gully and downstream receiving environments;
10. developer-funded reserve management, revegetation, monitoring and remediation obligations.

UBC Supports Local Submissions

UBC supports the submission prepared by Jan Zeck for the Swan Communities Environmental Alliance (SCEA) and that of the Friends of the Vines Bushlands (FoTVB). Both SCEA and FoTVB are members of UBC, and they will live with the adverse direct impacts of the implementation of the DSP as written.

Their local knowledge of the existing environmental challenges and their understanding of the complexity of the landform upon which the DSP sits is extensive. They truly believe that this area cannot be developed in the way planned and not incur environmental harm to areas of remnant vegetation. Such local knowledge must be valued and acted upon.

Conclusion

In summary, UBC believes the amendment is a small step in the right direction, but it must be greatly strengthened to prevent further cumulative loss of urban bushland, black cockatoo habitat and hydrologically sensitive ecosystems.

Thank you again for the opportunity to comment. We are available to meet with you to present our views in more detail. I can be contacted directly by mobile or email.

Yours sincerely

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