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DPLH - HAVE YOUR SAY, WA!

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Proposed subdivision at Lots 803 (No. 20) Ancestor Retreat and 900 (No. 567) Wanneroo Road, Woodvale

Thank you for the opportunity to provide comment on this proposal.

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 Urban Bushland Council WA (UBC) does not support the housing proposal on 'Woodvale Corner' due to many concerns but mainly that it is inconsistent with state and local planning policies regarding sustainable development. Native vegetation will be cleared unnecessarily resulting in the loss of native vegetation, tree canopy and community amenity. This includes the loss of foraging habitat for the threatened black cockatoos.

The lack of consideration for cumulative impacts on the local biodiversity and human quality of life is also worrying.

It is not stated in the proposal, but the loss of vegetation will mean a net loss in local green space and in wildlife numbers. Another factor that continues to be ignored in development proposals such as these is the impact they are having on people's physical and mental health and wellbeing. People are becoming more disconnected with nature and increasingly dismayed and disturbed by the level of destruction that nature is undergoing in Perth.

True sustainable development means building houses on land that has already been historical developed while retaining all native vegetation. The Urban Greening Strategy sets out a goal to increase Perth's tree canopy cover to 30% by 2040. This will not be realised unless remnant vegetation and existing tree canopy cover are preserved.

Alternatives to unsustainable development must be designed and implemented.

Alternative development proposal

The Urban Bushland Council WA (UBC) recognises the need for more housing in Perth.

There is a simple alternative to this proposal that will provide at least 70 residential units and retain all of the remnant bushland and vegetation. Build one or two apartments on the land on the west side of lot 803 that is already cleared. This will also provide a much-needed alternative to housing, other than simply single family homes. Parking could be on the ground floor with living space above starting on the first floor to reduce construction cost and have less impact on the hydrology of the site.

The government could also acquire the land and then build social housing or an age care facility (using the same apartment footprint). See image attached. Then the remaining native bushland could be restored and protected under a conservation covenant. (Note - if this was thought out before the land was rezoned to urban three years ago, the cost of the land would have been much cheaper to purchase.)

Reject the current proposal:



Instead, build an apartment(s) within the pink area, retain and enhance all native vegetation:



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Development in Perth must become more sustainable

The principles of sustainable development are well known and recognised by DPLH and WAPC and should be better followed.

Australia, along with all other UN Member States, have adopted the 2030 Agenda for Sustainable Development. Sustainable development "must integrate economic growth, social well-being and environmental protection". The 17 Sustainable Development Goals (SDGS) remain the world's roadmap for ending poverty, protecting the planet and tackling inequalities. Goal 11 is for **Sustainable cities and communities,** while Goal 15 is to protect **Life on land** – with a focus to sustainably manage forests, and halt and reverse land degradation and biodiversity.

DPLH acknowledges that the purpose of town and regional planning is to:

"To facilitate and manage change in land use and the built environment in a way that contributes positively to the wellbeing of individuals and communities, and the natural and built environments on which they rely."

[from- Parliament of Australia, Department of Parliamentary Services, Of the Plan: Commonwealth City Planning Systems]

Good planning:

• Considers how best to use, service and develop land to achieve common objectives and long-term goals

• Meets the expectations of the community and the needs of future generations

• Balances the objectives of individual landowners, residents and business operators with the broader interests of the community and protection of the environment

• Promotes health and welfare of the community

• Facilitates economic, social and environmental sustainability

Yet planning in Perth is becoming increasingly unsustainable- as evidenced by this proposal. Young adults looking to buy a house do not have the opportunities their parents had, and they are financially worse off. The environment is being degraded and destroyed by excessive clearing for development. Housing choices are limited. This is negatively affecting people's physical and mental health and well-being.

We need compact planning to minimise and reduce car use and to conserve the environment. Compact housing developments when poorly done are creating treeless, hot neighbourhoods with cars needed to get to services such as schools, shops, health services. The answer here is an apartment block.

Development in Perth must be more strategic – not piecemeal

Perth and Peel @3.5 million sets out the frameworks for urban planning with an expected population growth of 1.5 million people by 2050. It is recognised that strategic planning is the best way to ensure we have a healthy, connected and liveable city that is resilient to climate change and conserves Perth's unique biodiversity into the future. Yet this is not happening – including for this project.

There is no structure plan for this area. Hence, this proposal is another example of planning that lacks any integration into a larger community and environmental plan. It seems the proponents' chief concern is to maximize profits.

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A Strategic Conservation Plan is needed for Perth

For over two decades it has been recognised by subsequent governments that an overall strategy to conserve Perth and Peel's unique biodiversity is needed and should be integrated into the planning system. Despite this obvious need and much background work achieved, no overall strategy has been championed by the government of the day. When a Strategic Assessment of the Perth and Peel Regions was being considered over 10 years ago, the EPA summed up the need for a strategy beautifully in its interim advice on planning: "*it is incumbent on the present generation to lay the foundations for that growth to occur without further compromising our environment, both for its intrinsic value and because of the value it has to the health and wellbeing of the community.*"

(Perth and Peel @ 3.5 million environmental impacts, risks and remedies – EPA 2015 Perth-Peel-s16e-interim-advice-2015-web.pdf)

It is quite evident that a strategic plan should be created for Perth as well as structure plans created to fit into the overall strategy.

A District Structure Plan must be completed before any decision is made

The proposed subdivision plan claims a structure plan is not necessary. This is definitely not the case. A District Structure Plan helps to determine what facilities, open space and housing are needed in a neighbourhood. This could mean apartments for young people starting out, people retiring, social housing or an aged care facility. Is there a need for a medical centre? Or a children's hospice here? There were no options to consider as a District Structure Plan has not been done.

The land at 'Woodvale Corner' also provides habitat for wildlife and is part of an east-west wildlife corridor (or NatureLink). This issue is also not addressed, including how cumulative impacts of similar proposals in the area are contributing to urban heat island effects, climate change, and health issues (including dust, noise, depression, etc.).

The provision of a Local Development Plan is inadequate and not a substitute for a regional or strategic plan. It is a piecemeal plan that ignores the wider context of the impacts on the environment and the community and misses other opportunities.

Hence the claim that this proposal represents orderly and proper planning is not justified.

Furthermore, it is stated that there will be no prejudice to future development - which is focused on human housing and infrastructure, not on the long-term impacts on community amenity, cost of living, health and wellbeing and wildlife.

Small lots with little vegetation – a poor outcome

The provisions for green space and trees on the proposed single residential lots are dictated by the r-codes:

- Primary garden area – 40m2 (on lots greater than 220m2)
- Maximum permanent roof cover – 1/3 of the primary garden area - which is equivalent to only 9% (26.6m2) of the garden being left uncovered for 300m2 block
- 1 small tree (if planted at all)

The result here is neighbourhood with very little of the original green space left - likely less than 10%. A much better alternative is to retain the native vegetation and build 1 or 2 apartment blocks on the land that is already cleared.

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Noise and air quality concerns

The location of the proposed subdivision is next to two major roads – Ocean Reef Road and Wanneroo Road. Noise level on the eastern end of the development exceeds recommended sound levels for building interior without mitigation. Mitigation involves building a noise wall on the eastern and southeastern portion of the development.

What will it be like living next to these roads?

Why not build an apartment or two and keep the bushland as a buffer to the noise and to help keep dust down?

Water Management – More Information Required prior to decision

The Subdivision Water Management Report indicates that there are no significant wetlands located within the site. However, Walluburnup Swamp is approximately 30 m southwest of the site. The report did not emphasise that this is a Conservation Category Wetland. Nor did the report indicate whether or not the proposal will have an impact on the CCW. Clearing land and building on it can cause a significant rise in groundwater levels, unless appropriately managed. And during major storms, surface runoff is conveyed from an east to west direction towards Walluburnup Swamp. These local issues need to be examined and modelled further, plus the possible effects from changes in hydrology in the East Wanneroo District, before any decision can be made.

A 'high to moderate' acid sulfate soil risk is present on a portion of the site. Although the risk is considered low, more information is needed to show the possible impacts on Yellagonga Regional Park and Bush Forever site 299.

Traffic Considerations and Improve Public Transport

The traffic report clearly shows the Wanneroo Rd – Woodvale Dr unsignalised junction currently operates at unsafe levels of service. If this housing proposal proceeds, it will add an estimated 560 vehicle trips in the area per day. New signal and turning lanes will need to be considered.

However, the bigger consideration is whether the public transport system is good enough in the area for this housing proposal to go ahead at all. There is no east-west railway link.

The Importance of Yellagonga Regional Park

The health of the regional park and its wetlands is of high importance to the local and wider communities as recognised in the Yellagonga Integrated Catchment Management Plan.

Yellagonga-Integrated-Catchment-Management-Plan-2021-2026.pdf

The Plan outlines the park's significant regional values:

• Providing habitat for flora and fauna including iconic local species such as the South-western Snake necked Turtle (Chelodina colliei), Carnaby's Black Cockatoo (Calyptorhynchus latirostris) and Quenda (Isoodon fusciventer).

• A Bush Forever site (299) containing regionally significant vegetation.

• Improving ecological function such as air quality, carbon capture, and soil health.

• Decreasing erosion, salinity, water pollution and noise pollution.

• Providing opportunity for recreational and cultural experiences.

The proposal should be rejected as it il have negative impacts on the park. See following.

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Protection of Black Cockatoo foraging habitat

A total of 1.4 hectares of foraging habitat for the threatened Forest Red-tailed Black Cockatoo and 0.2 hectares of the Carnaby's Cockatoos will be permanently lost if this proposal goes ahead.

Because the foraging habit for the red-tails is degraded, the environmental report dismisses this as insignificant. This is incorrect. The proposal will result in a permanent net loss of foraging habitat and potential habitat. It seems the that the land has been deliberatively neglected for years and allowed to be degraded. Instead, this site can be restored to provide the much-needed food for the birds. The red-tails have moved into Perth in the past two decades because they are inn great need of new food sources as the southwest forests continue to be cleared.

Furthermore, although only 0.2 ha will be lost for the Carnaby's, these amounts of food sources are becoming more an more important to retina. Up to now, cumulative impacts have been ignored and are resulting in the continued decline in population of this endangered bird.

By using an alternative approach to building on this site, all of the foraging habitat can be retained and enhanced and even expanded by planting new food trees in the existing bushland.

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.

There are 1.57 hectares of native vegetation on the site, predominantly comprising degraded Sheoak and scattered Banksia woodland. It was assessed as "Degraded" due to extensive weed invasion and a lack of native understorey. Hence the environmental consultants stated that 'no areas of vegetation are considered important to retain for their flora or vegetation values'. Not true. It is worthy of protection.

It is most likely that the vegetation is so highly degraded because of the lack of proper management by the owner. It is argued here that this site should be conserved and restored so that it provides valuable wildlife habitat and amenity for the community. If the patch is cleared it will be a net and permanent loss of wildlife habitat resulting in lower local wildlife numbers.

Benefit for Bush Forever Site 299

Yellagonga Regional Park is separated by Ocean Reef Road and Whitfords Avenue and exists as three areas of natural habitat surrounded by roads and residential development. This limits the ability of terrestrial animals to disperse between habitats, restricting gene flow and contributions into the gene pool. Such fragmentation often results in smaller habitats that cannot provide for all of animal's needs, who then risk death as they attempt to cross roads seeking food or shelter.

The site on which the housing is proposed is adjacent to Bush Forever Site 299 (Yellagonga Regional Park). If restored it would act as additional habitat for the wildlife and as a wildlife corridor between to other urban bushlands. This would help increase the health and resilience of the adjacent Bush Forever site. But building on 'Woodvale Corner will have the opposite effect by diminishing the wildlife habitat, the genetic pool, and the movement of the animals between them.

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Consideration of Cumulative Effects of Recent Development

Much of the natural landscape on the Swan Coastal Plain has been cleared for urban development. The remaining bushlands and wetlands, now exist as small islands in a sea of urbanisation.

The cumulative effects of recent development in the Woodvale area and beyond should be considered together with the proposed housing development to determine the true impacts on Yellagonga Park, the local biodiversity and the black cockatoos. Also to be investigated are the cumulative urban heat islands effects and the associated impacts on the quality of life.

The cumulative effects can be avoided and reversed by conserving and enhancing the native vegetation on this site.

Urban Heat Island Effects

The advice in 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*".

Conclusion

UBC cannot support the housing proposal on 'Woodvale Corner' that will remove virtually all of the native vegetation, decreasing community amenity and the amount of local wildlife. UBC would support an alternative to the development where apartments (or aged care facilities) are built on the portion of lot 803 that is already cleared – ensuring that development is done in a truly sustainable manner - helping to conserve nature and people's health and wellbeing.

Thank you again for the opportunity to comment. Our contact details are below.

Yours sincerely,

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