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Draft Perth and Peel Green Growth Plan for 3.5 million
 Department of Premier and Cabinet
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Draft Perth and Peel Green Growth Plan for 3.5 million

In addition to earlier communications, the Urban Bushland Council WA Inc (UBC) presents the following submission on the draft Perth and Peel Green Growth Plan for 3.5 million (GGP).

GENERAL COMMENTS

We support the concept of preparing a strategic assessment under the *EPBC Act* to protect the outstanding unique environmental values that are well expressed on page ii of the Draft Strategic Conservation Plan for the Perth and Peel Regions.

For many years the region has been losing bushland and wetlands, patch by patch, without proper conservation and management of local areas or of the whole biodiverse region. The Strategic Assessment process is an opportunity to ensure that this loss of our precious bushland - and its biodiverse values - stops, and that Matters of National Environmental Significance (MNES) together with State environmental values are properly protected and managed.

RECOMMENDATION	<p>We submit, however, that the Green Growth Plan (GGP) as presented:</p> <ul style="list-style-type: none"> • does not meet the conservation objectives to protect MNES, • does not meet the conservation objectives to protect State environmental values, • is environmentally unsustainable, and • requires substantial revision. <p>To this end it is recommended that a revised draft plan be released for public review again for 90 days before being finalised.</p>
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Further, we recommend that the revised draft plan is also formally assessed by the State EPA, with the EPA's recommendations for set conditions to be made legally binding under the *WA Environmental Protection (EP) Act* by the State Minister for the Environment. This would be in addition to provisions for protection, management and auditing specified under the *EPBC Act*.

3.5 million population

The GGP is based on the flawed assumption that Perth's population will almost double by 2050. There is no analysis given that justifies this and we submit that this is unrealistic and unsustainable. The urban form of Perth is already highly sprawled and is neither energy efficient nor 'infrastructure efficient'.

RECOMMEND.	<p>We recommend that the GGP is rigorously revised according to the principles of ‘ESD’ (ecologically sustainable development) which include:</p> <ul style="list-style-type: none"> • no further land clearing, • protection and management of our biodiversity hotspot within our suburbs, • smart infill along transport corridors, and • with greenways and ecological linkages comprising local plant species and wildlife habitat.
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Bush Forever, System 6, Regional Park plans, Recovery Plans

Much of the conservation planning for the region has already been completed via the System 6 study¹, the Bush Forever plan², Regional Park plans³ as well as recovery plans for some endangered species⁴.

The GGP fails to acknowledge the existence and rigor of these scientific planning programs and does not incorporate protection of all these areas and their biodiversity values as MNES.

RECOMM.	<p>All the outstanding land reservation proposals in these reports should be implemented ‘up front’ and without further delay before consideration of further growth in the GGP. All the Regional Parks already planned over the years need to be established immediately. All the Bush Forever Areas need to be secured immediately.</p>
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CAR Reserve system: Page 15, 2.1.2 of the **Draft Strategic Conservation Plan** under the key commitment of expanding the conservation reserve system states: *‘The creation and management of a comprehensive, adequate and representational conservation reserve system (CAR reserve system) is a cornerstone of State wide biodiversity conservation efforts.’* But the GGP does not mention or incorporate Bush Forever as a comprehensive ‘CAR’ reserve system to be fully implemented as planned in detail in the Bush Forever documents (Government of WA December 2000). It is also remarkable that the online GGP maps do not even show the boundaries of all Bush Forever Areas, or their numbers or names despite the fact that all Bush Forever Areas have statutory definition on the Metropolitan Region Scheme or MRS maps. There is no ‘key commitment’ to Bush Forever shown on page vi (Executive Summary, Draft Strategic Conservation Plan for the Perth and Peel Regions).

Bush Forever is a world class, whole of government plan introduced in 2000 and was to be fully implemented by 2010. But it is still incomplete. The Urban Bushland Council, in December 2014, held a Report Card conference for Bush Forever implementation which was officially opened by the Minister for Planning, Hon John Day MLA. Printed proceedings of the conference were produced. Two years later, the Bush Forever Audit, promised at the conference by the Minister, has yet to be released.

¹ WA Department of Conservation and Environment (1983) Conservation Reserves for WA - System 6

² Government of WA (2000) Bush Forever: Keeping the Bush in the city

³ Regional Park Plans eg Conservation Commission of WA, Department of Parks and Wildlife, City of Armadale, City of Cockburn and Town of Kwinana (2010) Jandakot Regional Park Recovery Plan

⁴ Recovery Plans eg Department of Conservation and Environment (2010) Western swamp tortoise (*Pseudemydura umbrina*) Recovery Plan

RECOMMENDATION	All Bush Forever Areas should be formally secured for protection as A class nature reserves or equivalent with conservation managers allocated for each Area. Funding arrangements for management need to be defined by the State and appropriate budget allocations made for initial capital works and for ongoing management. Indeed, the Urban Bushland Council in October 2015 presented a ‘Call for Action on Bush Forever’ which specified all the elements of the Bush Forever plan that require completion. This work, as planned, needs to be completed by the State before a revised Green Growth Plan is introduced. Attached is a copy of the ‘Call for Action’.
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RECOMM.	Implementation of Bush Forever remains unfinished business of government and this serious shortfall of actions to secure a CAR reserve system for the Perth region, a global biodiversity hotspot, must be completed as a priority now in 2016. The recognition and commitment for completion of Bush Forever implementation to secure a CAR reserve system must be included in a revised GGP.
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Bush Forever Areas on GGP maps

Attached is an analysis, including a detailed spreadsheet, which shows the impact of the GGP Actions on each Bush Forever Area. Alarming, there are many incursions and anomalies that need to be removed.

REC.	After securing <u>all</u> Bush Forever sites in the conservation estate, they should <u>all</u> be dark green on the revised GGP maps.
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Key outcomes (p iv of the Draft Strategic Conservation Plan)

Protection of MNES including state environmental values should be the primary, over-riding goal of the Strategic Assessment process and the GGP. The key outcomes on page iv of the Draft Strategic Conservation Plan require complete revision so that they address first of all the requirements for protection of MNES and state environmental values. This means that these MNES areas should not be cleared. Notably, page iv shows a switch in emphasis of this document from planning for protection of MNES on page ii, to one of upfront approval of mining and development over huge areas of bushland comprising MNES, for more urban sprawl. It is poignant that the order of ‘key outcomes’ starts with *‘improved access to strategic deposits of BRM’* followed by co-location of infrastructure corridors, then the unclear statement of *‘reduced fragmentation of environmental values’*. What does this mean?

The setting aside of *‘170,000 ha of new parks and reserves’* (refer p 3 summary document) is very misleading and deceptive as most of these areas are already government owned or are Crown reserves or UCL.

The comprehensive conservation package claims to resolve tenure, ownership and management of Bush Forever sites but it does not do this. Rather, it erodes the conservation status and intent of the Bush Forever plan, although this is hidden on the maps. Bush Forever Areas are scattered in different categories on the on-line maps: some are in dark green, some in dark blue, far too many are in pale blue, some are in hatched green and many have a mixture of colours and incursions of infrastructure or development zones. This confuses tenure, does not reflect resolution of ownership, and no provision for conservation management is given for sites.

Infrastructure

There seems to be a hidden agenda to locate infrastructure corridors in Bush Forever Areas, Regional Parks and other MNES. The GGP admits that detailed planning for the location of infrastructure has not been completed as stated on page 30 (*Ibid*) and only ‘indicative locations’ are shown in figure 3-4. The GGP effectively seeks blanket approval of future infrastructure in bushland sites (deceptively described as greenfield locations) without specifying where they will be. This is totally unacceptable and infrastructure must not be located in Bush Forever Areas, Regional Parks, ecological linkages or local bushland reserves.

An example is the Water Corporation’s proposal for a sewerage pressure main to cut across the high value Bush Forever Area 342, Anstey-Keane Damplands. This is shown on Figure 3-4 but the maps are unclear.

RECOMMENDATION	<p>Infrastructure planning needs to be revised and completed so that locations are known and incursions into Banksia woodlands and wetlands and areas of MNES are <u>all avoided</u>.</p> <p>It is recommended that the Commonwealth does not approve the Infrastructure Class of Action as described in the Draft Strategic Conservation Plan section 3.7.1 and that it be revised so that for infrastructure, no clearing or incursions into MNES and state environmental values are permitted.</p>
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Avoidance

The principle of ‘avoidance’ is misused to provide misleading and erroneous justification for approval of the conservation framework (see page v *Ibid*). We are being told that there will be avoidance of ‘16,400 ha of impacts to native vegetation (including over 15,700 ha of Carnaby’s cockatoo Swan Coastal Plain feeding habitat)’. This sounds very positive but it is being erroneously used to justify clearing of the huge area of more than 25,000 ha of native vegetation habitat. This section and others referring to ‘avoidance’ should be deleted and revised as below.

RECOMM.	<p>Proper use of the principle of ‘avoidance’ for the endangered Carnaby’s cockatoo necessitates that <u>all clearing and loss of native vegetation habitat</u> has been avoided in the GGP.</p> <p>It is therefore strongly recommended that the GGP be revised so that all clearing of native vegetation Cockatoo habitat (feeding, roosting, breeding) is avoided. The same principle should equally apply to all the habitat of other MNES.</p>
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Key commitments (p vi *ibid*)

1. Bush Forever Areas and Regional Parks: On page v, there is no key commitment for all Bush Forever Areas and all Regional Parks to be secured as conservation reserves. This commitment should be added. The 170,000 ha stated to be additional reserves (80,000 ha in phase 1 + 90,000 ha in phase 2) is misleading as all the phase 1 areas and many of the phase 2 are already in the conservation estate as Bush Forever reserves or Regional Parks.

Proper use of the principle of ‘avoidance’ for the endangered Carnaby’s cockatoo necessitates that all clearing and loss of native vegetation habitat has been avoided in the GGP.
It is therefore strongly recommended that the GGP be revised so that all clearing of native vegetation

Cockatoo habitat (feeding, roosting, breeding) is avoided. The same principle should equally apply to all the habitat of other MNES.

RECOMM.	<p>It is (again) recommended that all Bush Forever Areas be added to the secure conservation estate immediately in 2016 as most are already reserves or are owned by the WAPC.</p> <p>It is recommended that all Regional Parks be secured under the <i>CALM Act</i> immediately in 2016.</p>
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2. Carnaby's cockatoo: For protection of Carnaby's cockatoo, the creation of 116,000 ha of 'additional' conservation reserves is both misleading and double counting as these areas are already reserves and are included above. Furthermore, Carnaby's cockatoo requires all the existing habitat in the Region, especially on the Swan Coastal Plain, and to them there is no 'addition' in the GGP. On the contrary, the GGP provides a significant net loss of habitat which will result in further significant decline in their population viability. This is contrary to the provisions of the *EPBC Act* and the Recovery Plan for Carnaby's cockatoo⁵ which specifies maintaining population viability.

REC	<p>The commitments for the protection of Carnaby's cockatoo are totally inadequate and require strong revision across all Action Plans.</p>
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Refer to our detailed comments on Part D, chapter 15 and Draft Action Plan F (See attachment). Conservation commitment 32 on page 17 of Action Plan F is totally unacceptable, and must be deleted as it allows for loss of 38,500ha of habitat.

RECOMMENDATION	<p>It is recommended that the GGP be revised so that the population of Carnaby's cockatoo is maintained according to the definition of long-term viability stated on page 48 in Table 4-2 of the Strategic Conservation Plan; and also to comply with the Recovery Plan which states:</p> <p style="text-align: center;"><i>'To stop further decline in the distribution and abundance of Carnaby's cockatoo by protecting the birds throughout their life stages and enhancing habitat critical for survival throughout their breeding and non-breeding range, ensuring that the reproductive capacity of the species remains stable or increases.'</i></p> <p>so that the objective to stop the decline in the population size and area of occupancy within the Perth and Peel region is achieved. Note that the federal Minister for the Environment cannot approve a Plan which is inconsistent with a Commonwealth-approved Recovery Plan.</p>
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3. Conservation Category Wetlands (CCW) and their buffer zones all need to be protected with no incursions permitted.

REC.	<p>It is recommended that the Action Plans that include 'intersection' of CCWs and other categories of wetlands be amended so that there are no incursions permitted into wetlands or their buffer zones.</p>
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⁵ WA Department of Parks and Wildlife (2013) Carnaby's Cockatoo (*Calyptorhynchus latirostris*) Recovery Plan

LAND CLEARING

The Action Plans (A, B, C, D) provide for clearing of more than 25,000 ha of native vegetation, mostly comprising Banksia woodlands. Some of this includes clearing and fragmentation of the known habitat of state and federally listed rare, threatened and priority species and communities. For example Appendix C gives details of the ‘intersection’ with and incursions into *EPBC Act* listed TECs. But for most of the area, it is not known whether rare or priority species and communities are present.

There is a knowledge gap concerning the extent and distribution of these species and communities and this baseline data needs to be collected, mapped and documented by the state government.

RECOMMENDATION	<p>Given the complexity and species richness of the region as a global biodiversity hotspot, there is an urgent need for baseline scientific field surveys of flora, vegetation and fauna to be funded conducted and documented by the state government before any more clearing takes place. Currently patches of bushland are being cleared and lost without knowledge of the presence or absence of listed species and especially communities. Also the category of all federal listings needs to be reviewed and revised to be consistent with the new data and with WA State listing categories.</p> <p>It is recommended that the GGP Action Plans be revised so that the habitat of all threatened species and communities is legally protected and clearing thereof is prohibited.</p>
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OFFSETS: Draft Action Plan F, 4.1, page 11

The Urban Bushland Council objects to the justification of clearing protected areas by use of offsets. Table 1 has a section on Offsets which includes ‘*establishment and management of 170,000 ha of new conservation reserves, including ownership, tenure and management arrangements for Bush Forever, the Peel Regional Park, and selected Peel RSNA; and improving management...*’. They are mostly not new reserves. Most are already reserves in Bush Forever and Regional Parks. This shows that the government is proposing to use offset funds to implement and manage these existing government reserve programs and plans. This is totally unacceptable. Clearing of threatened species and communities should not be justified on the basis of provision of offset funding. These threatened species and communities should be all formally protected, with no clearing permitted.

The Bush Forever plan specifies that its implementation and management is a State government responsibility. And the existing Metropolitan Region Improvement Fund (MRIF) exists to provide funds for acquisition and initial capital works and management of Bush Forever sites. The MRIF should be used for completion of Bush Forever, and the MRIT rate should be raised to provide adequate funds. Introduction of an equivalent Regional Improvement Tax (RIT) to apply in the Peel region, as well as the Bunbury Region Scheme is also supported.

CLIMATE CHANGE

There is no mention, or consideration or analysis in the GGP of the impacts of global warming and climate change on the region’s MNES and state environmental values. In the press (11 May 2016) scientists at Cape Grim recording station (Tasmania) announced that the carbon dioxide concentration in the atmosphere reached 400 ppm for the first time on this day. Scientists are warning that the need to reduce Greenhouse gas emissions is extremely urgent. Climate change is already happening in our region at an unsafe rate and this is a major threat to our Perth - Peel ecosystems and their rich biodiversity.

There is no consideration of plans to reduce Greenhouse gas emissions (eg with increased greenways, increased vegetation cover and no clearing, less car travel,) in the new urban infill form of development under the GGP.

REC.	It is recommended that the GGP be reviewed on the basis of advice from climate scientists and ecologists.
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GROUNDWATER DECLINE See UBC Submission - GGP Action E pines

Declining groundwater levels are a serious threat to the health of native vegetation and wetlands on the Swan Coastal Plain. Our members report the increasing prevalence of scattered mature tree deaths in their local bushland and much lower water levels in wetlands. For example a recent survey by the Friends of Dianella Bushland in Bush Forever site 43, Cottonwood Crescent Dianella (see attachment) revealed a loss of 272 trees, mostly Banksias, in 2015/16.

Groundwater drawdown results from uncontrolled abstraction and abstraction well above licensed limits. Evidence from Report no. 60 by DOW and details of this issue are shown in the above attachment for Action Plan E. As a 'man-made' threat, there is the potential to address this threatening process by substantially reducing groundwater allocations and closing bores in sensitive areas as stated in our attachment. Introduction of a new review and regulation of licenses by the DOW as recently announced is supported. Our MNES and especially Banksia woodlands cannot survive increased groundwater abstraction for public or commercial use with growth of Perth-Peel to 3.5 million. The GGP requires revision to address this key issue.

FUNDING FOR ENVIRONMENT AGENCIES

There is no clear and adequate commitment of State government funding of environment agencies, especially in the light of severe staff and budget cuts to DPAW, DER and OEPA over the last 5 years. It is a state government responsibility to address the knowledge gaps as specified above. State government agencies and local governments require greatly increased capacity and scientific expertise to manage our biodiversity assets in Bush Forever, Regional Parks and local reserves as well as in linkages and greenways. This core business should be fully funded by consolidated revenue.

CONCLUSION

The Perth-Peel region lies within a global biodiversity hotspot *for conservation priority, because it is under threat*. Perth's Banksia woodlands and wetland ecosystems are unique and rich in biodiversity, and precious but under threat of continued clearing justified by a flawed process of offsets. The Green Growth Plan requires considerable revision to end clearing and ensure this fabulous natural landscape setting is protected and proudly managed for its highly acknowledged intrinsic value, as well as for the future health of our children and adults, our human need for connection with nature, and benefit of us all.

The [Urban Bushland Council](http://www.bushlandperth.org.au) looks forward to revision of the Green Growth Plan according to our advice. Our representatives request the opportunity to discuss these matters with you.

We may be contacted at ubc@bushlandperth.org.au Phone 9420 7207 or if unattended, 9444 5647 or celiagray@bigpond.com

Yours sincerely

C Mary Gray
President, Urban Bushland Council WA Inc.
11 May 2016

More information on the Urban Bushland Council can be found at <http://www.bushlandperth.org.au>

ATTACHMENTS:

UBC Submission - GGP Carnaby's EPBC assessment Ch 15

[UBC Submission - GGP Action E pines](#)

UBC Submission - GGP Bush Forever Areas on GGP maps

UBC (October 2015) Bush Forever 'Call for Action'

[Cottonwood Tree Survival Summer 2015](#)

(To view the attachments not available above please see <http://www.bushlandperth.org.au>)