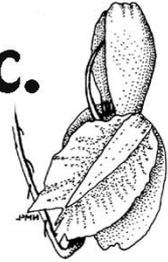


FRIENDS of TRIGG BUSHLAND, Inc.

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10 May 2016

Draft Perth and Peel Green Growth Plan for 3.5 million
Department of the Premier and Cabinet
Locked Bag 3001
WEST PERTH WA 6872

Dear Sir/Madam

RE: SUBMISSION ON THE PERTH AND PEEL GREEN GROWTH PLAN

Thank you for the opportunity to comment on the Perth and Peel Green Growth Plan for 3.5 Million (the plan). The Friends of Trigg Bushland Inc. (FoTB) is a voluntary organisation that was established in 1990 and currently consists of over 100 members. The FoTB actively contribute to the management of Trigg Bushland Reserve (Bush Forever Site 308), and advocate for the recognition and conservation of Perth's urban bushland.

The FoTB have reviewed the plan and commend planning at the landscape scale, where vegetation conservation and connectivity can be maximised across the overall landscape. However, the FoTB feel that the plan does not result in any significant conservation measures for Perth's urban bushland, and in many instances approves the development of land previously earmarked for conservation.

The FoTB would like to make the following comments in relation to the plan, the Draft Strategic Conservation Plan, and associated Action Plans A - I:

- **Protection of Bush Forever Sites** (*Draft Action Plans A - C*): The proposed development impacts 191 of the 282 Bush Forever Sites (BFS) located within the strategic assessment area, with the main impact from the proposed infrastructure and to a lesser extent, urban footprints. Development within these sites is supported where there is deemed to be "no reasonable or practical alternative", with the decision-making process designed towards achieving "pragmatic outcomes" for the development of land that contains environmental values. The FoTB believes that all BFS should be protected from any further development due to their low representation (<10% of each of the original 26 vegetation complexes on the Swan Coastal Plain) and the rarity of the environmental values they contain.
- **Infrastructure Development** (*Draft Action Plan C, Section 2.3 Finalisation of Infrastructure Design and Location*): The plan states that the proposed infrastructure network is largely conceptual and the final alignment requires investigation. However, the 'infrastructure' category includes developments

with large footprints, such as water recycling treatment plants, bus depots and power sub-stations, as well as utility service corridors. As these have the potential for significant environmental impacts, the FoTB request that a detailed map of the proposed locations is provided for public comment prior to final approval.

- **Funding of Conservation Commitments** (*Action Plans A - D, Section 4.5 Funding Arrangements*): Funding of the actions is vital for successful implementation. To state that "funding mechanisms are being developed and are likely to include contributions from proponents" does not inspire confidence that the conservation program will be adequately financed.
- **Carnaby Cockatoo Conservation Measures** (*Draft Action Plan E aims, Section 3.2 Land Continued to be used as Plantation*): The proposal to replant 5,000 ha of harvested pine forest with new pine seedlings to provide a food source for Carnaby's Cockatoo is not supported. The pine plantations are a vital roost and forage site for the endangered black cockatoos, and new seedlings would not provide the same function for over 10 years, which is too slow for a species in critical decline. Instead, FoTB suggests a slower harvesting rate of the existing pine plantations by thinning selected areas rather than total harvesting, achieved by potentially covering some of the cost of the harvesting contract.
- **Improving Groundwater Recharge** (*Draft Action Plan E, Section 3.3 Land Not Continued to be used as Plantation*): The proposal to convert 18,000 ha of harvested pine forest to grassland or low water use vegetation to minimise water interception and use is not supported. Instead, FoTB supports the rehabilitation of these areas to the original banksia woodland ecosystem, which has recently been nominated as a Threatened Ecological Community under the *EPBC Act* due to its poor representation on the Swan Coastal Plain due to clearing. This vegetation type naturally has low water use and provides multiple ecosystem benefits compared to exotic species or monocultures. It is also suggested that water abstraction licences in the Gngangara mound are reviewed and further reduced where necessary to address a long history of groundwater overuse.
- **Protection of Threatened Species and Communities** (*Draft Action Plan G, Table 1*): The environmental commitments identify the need to protect occurrences of threatened species and communities where they occur in BFS. The FoTB suggests that all relevant actions are changed to protect the entirety of all BFS, as isolated occurrences of threatened species and communities in small fragments of vegetation are not viable over the long term.
- **Measurement of Implementation of Commitments** (*Draft Action Plan G, Table 1*): Many of the environmental commitments are vague e.g. Action 48 "Better understand and manage urban heat island vulnerabilities by undertaking studies and monitoring". It is recommended that actions in this plan are more specific and detailed to enable success to be measured, and the implementation mechanisms also identified.
- **Phase 2 Conservation Reserves** (*Draft Action Plan H, 3.1.2 Phase 2*): It is unclear how the 90,000 ha of the 160,000 ha earmarked for proposed conservation reserves will be chosen, and whether the community will have

input. The FoTB also believe that there is the potential for the environmental values of the proposed conservation reserves to significantly degrade over the 30 year time frame of Phase 2, until such time as they are made permanent and actively managed.

- **Reducing Nutrient Loads** (*Draft Action Plan H, Section 3.3.1 Improving Water Quality*): The drainage nutrient intervention program needs to be effectively monitored and compliance conditions imposed if the mandatory soil testing shows that soil nutrient levels are excessive. The fact that there is no regulation to govern fertiliser application rates means that it is unlikely there will be any tangible decreases in nutrient loads entering the Swan-Canning River system.
- **Protection of Wetlands** (*Draft Action Plan H, Section 3.3.2 Protection of Wetlands*): A review of Resource Enhancement Category wetlands to determine those that qualify for a status upgrade to a Conservation Category wetland is supported. Many of these wetlands have significant ecological value but are currently not managed for conservation purposes, with many existing primarily for urban stormwater drainage. As Conservation Category wetlands account for only 17% of remaining wetlands in the Perth and Peel regions, the need for protection of additional wetlands is vital.
- **Conservation Program** (*Draft Action Plan H*): The conservation program aims to establish 33,000 ha of the initial 80,000 ha of conservation reserves outside of the strategic assessment boundary, which is nearly half of the total reserve area. The FoTB believes it is important that the majority of conservation reserves are located within the assessment boundary, to ensure natural areas are retained within the metropolitan system and provide a localised offset to the increased population density.
- **Streamlining Environmental Approvals** (*Draft Strategic Conservation Plan, Section 2.5 Streamlining Environmental Approvals*): It is important the most appropriate legislation and governing body is identified to ensure a rigorous assessment of development applications and their proposed actions to meet the required conservation and environmental outcomes. As the EPBC Act will no longer apply, and the role of the EP Act will be reduced where possible, the final approvals process should be clarified in the plan to instill public confidence in the development approval process.

Should you wish to discuss any of the matters raised above in further detail, please do not hesitate to contact Melanie Davies, Friends of Trigg Bushland Committee Member, on 0427 655 588 or email triggbushland@gmail.com.

Yours sincerely,

FRIENDS OF TRIGG BUSHLAND INC.