



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

6 October 2023

Department of Planning, Lands and Heritage
140 William Street
Perth WA 6000

Email: infrastructure@dplh.wa.gov.au

Re: Metropolitan Region Scheme (MRS) Amendments 1404/41: Roe 8 Remainder and Roe 9

The Wildflower Society of Western Australia (hereafter referred to as WSWA) welcomes the opportunity to comment on the rezoning proposal for the Roe 8 and Roe 9 Corridor by the Western Australian Planning Commission (WAPC). This proposal is to rezone small fragments of land as Parks and Recreation and the remainder of the corridor as Urban. WSWA does not agree with this proposal.

WSWA is the peak WA community organization seeking to conserve natural vegetation in Western Australia. The Society is an incorporated, self-supporting not for profit organization. We are a voluntary group with an active membership of almost 700 volunteer members and social media following of over 40,000, all with a common interest in conservation and protection of natural vegetation and wildflowers across WA.

WSWA calls on the WA government to adopt a more visionary approach to the conservation of the Roe 8/9 Corridor consistent with the objectives of the community who opposed its development as part of the road network, and in line with its own Native Vegetation Policy, to:

- Conserve and protect all existing native vegetation along the Roe 8/9 corridor, and
- Restore ecosystems along the corridor to create viable ecological connectivity.

WSWA strongly supports the community's expressed wishes for a green corridor to create a vibrant and connected nature link from the Beelihar Wetlands to the Indian Ocean, restoring ecological function to the remnant and fragmented bushland and wetlands.

WSWA joins with many other conservation groups and members of the public to urge the State Government to:

1. Rezone the ENTIRE Roe 8/9 corridor as Parks and Recreation (P&R). While we acknowledge that the proposal includes several slices of land to be rezoned P&R land, this is not enough.
2. Establish an ecological green corridor (Wetlands to Waves) extending from the Beelihar Wetlands to the Indian Ocean and incorporated into the Beelihar Regional Park.
3. Incorporate the land at the intersections of Forrest Road with North Lake Road and Stock Road into the Green Corridor and rezone as P&R. This land is some of the highest quality bushland along the Roe 8/9 corridor and MUST NOT be cleared or disturbed.
4. Extend the Green Corridor to incorporate the land in the Fremantle Rockingham Access Corridor (at the north and western edge of Manning Park) and rezone P&R.



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5. Comply with local, state, federal and international environmental legislation, agreements, policies, and guidelines that affect our urban ecology (see below).
6. Identify and protect Aboriginal heritage and cultural values in the area.

Why A Green Corridor?

The Cockburn Green Corridor (Roe 8/9) is consistent with the WA Native Vegetation Policy to:

- Conserve: Protect native vegetation from harm, loss, or change, and
- Restore: Supporting the recovery of an ecosystem that has been degraded, damaged, or destroyed. Recovery includes revegetation, rehabilitation, repair of ecosystem processes, and management of threats.

The DPLH Preliminary Consultation in 2022, as reported, resulted in 75% of respondents commented on the need to “protect the environment” and more than 50% “advocated for a wildlife corridor”.

The Cockburn Green Corridor vision recognises this community support and the original support for abandonment of the Roe 8/9 proposal, and will provide benefits to all in perpetuity:

1. It has unique native vegetation that has been largely lost from greater Perth. The corridor contains seven distinct ecological zones including wetlands, paperbark forest, banksia/tuart woodlands and three dune systems, much of which is in good condition. It MUST be protected.
2. Within the reserve there exist two Threatened Ecological Communities (TECs) protected under the Federal Environmental Protection and Biodiversity Conservation (EPBC) Act 1999 and the WA Biodiversity Conservation Act 2016: Tuart woodlands are listed as Critically Endangered (EPBC) – Mapping of the area by Cate Tauss has identified around 20ha of Threatened Tuart woodlands on both sides of Forrest Road and in the Blackwood Road bush. Another 5ha containing Tuarts is found at Dixon Park and Clontarf Hill.
3. Banksia woodlands of the Swan Coastal Plains are listed as Endangered (EPBC) – Several banksia species live throughout the corridor and sustain thousands of birds, reptiles and insects.
4. Native vegetation in the area supports the survival of several Threatened and Endangered species (EPBC Act 1999 that depend on large areas of connected vegetation.
5. If restored as a strong ecological linkage, the Corridor will support genetic exchange for more resilient flora and fauna species.

Supporting Laws, Regulations, Policies and Plans

The call for the Roe/8/9 Corridor to be set aside as a Parks and Recreation reserve is also in line with a many Local, State, Federal and International laws, regulations, policies and plans.

Local Government

- Planning & Development Act 2005 (WA)
Schedule 7 outlines valid local planning strategies, including: ‘The conservation of the natural environment of the scheme area, including the protection of natural resources, the



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preservation of trees, vegetation and other flora and fauna, and the maintenance of ecological processes and genetic diversity.'

- City of Cockburn
 - Public Open Space Strategy (2014-2024) supports ecological corridors and standards expected of developers when rehabilitating sites.
 - Sustainability Policy (June 2021) says: "Council will protect strategically identified remnant bushland, wetlands, the coastal environment, ecological corridors and associated eco systems to ensure the integrity of these systems is conserved and enhanced for future generations."
 - Natural Areas Management Plan and Urban Forest Strategy identify existing and potential ecological corridors within the LGA.
 - Supports the Wetlands Centre in the Beeliar Park Precinct.
- Western Australia Local Government Association (WALGA)
 - WALGA policies encourage biodiversity conservation:
 - Guidance for the Integration of Biodiversity Conservation into Local Planning Strategies and Schemes
 - The WALGA Perth Biodiversity Project used a mapping framework to identify priority natural areas for biodiversity conservation and connectivity. Using this framework, a report published in 2020 (R. Zelinova "Cockburn Community Wildlife Corridor proposal in the context of regional connectivity planning") concluded that the Roe 8/9 road reservation was the best option for a connected green corridor in the south metropolitan suburbs.

State Government

- Native Vegetation Policy 2022

The Native Vegetation Policy commits the government to a net gain in native vegetation, through conservation and restoration of natural areas. Currently this is not happening, and WA is experiencing a net loss of native vegetation and biodiversity. A net gain requires a halt to land clearing and serious efforts to restore native vegetation. The Cockburn Green Corridor offers a unique opportunity to implement the policy: To protect and enhance native bushland with the intent of long-term protection of biodiversity and environmental values.
- Better Urban Forest Planning – Perth and Peel

The WA Planning Commission has developed a tree canopy mapping tool and guidelines to assist better Urban Forest Planning.
- Perth to Peel @3.5million

The aims of The Perth and Peel@ 3.5 million (2018) planning strategy include to "protect areas with regional conservation and landscape values" and "encourage and guide increased connectivity through an integrated green network".
- Biodiversity Conservation Act 2016

The Biodiversity Conservation Act provides protection for threatened species and ecological communities, including penalties for illegal actions.
- State Planning Policy 2.8 Bushland Policy for the Perth Metropolitan Region

Aim: To protect and enhance native bushland with the intent of long-term protection of biodiversity and environmental values. The policy seeks to protect and manage significant urban bushland, including Bush Forever sites, and assist conservation planning and assessment.
- Conservation & Land Management Act 1984 (WA)



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Enables sites to be designated as conservation parks (Section 6.4 and 8B.2). The entire Cockburn Corridor should be granted conservation status.

- Environmental Protection Act 1986 (amended Dec 2021)
The Environmental Protection Act seeks "the prevention, control and abatement of pollution and environmental harm, for the conservation, preservation, protection, enhancement and management of the environment..."
Relevant EPA resources are:
 - Schedule 5: Principles for clearing native vegetation.
 - Statement of Environmental Principles, Factors and Objectives (October 2021)
 - EPA Guidance for planning and development: Protection of naturally vegetated areas in urban and peri-urban areas (December 2021).
- The Water Corporation
The Water Corporation is working with Naturelink Perth and others to promote green corridors and healthy streams along Perth's drains and waterways.

Federal Government

Environment Protection and Biodiversity Conservation Act (EPBC) 1999

The EPBC Act includes directories of listed threatened species and listed threatened ecological communities. The Cockburn Green Corridor contains two Threatened Ecological Communities (banksia woodlands and tuart woodlands) and habitat for several threatened species. The EPBC guidelines address both protection and restoration actions to increase the remaining extent, condition and landscape scale connectivity (including with other surrounding native vegetation types).

Australian Institute of Health and Welfare (AIHW)

IHW is a Federal government agency producing information to support better policy and service delivery for better community health and wellbeing. A July 2022 report found that: Nature provides:

- health benefits by filtering harmful air pollution;
- economic benefits through avoided incidences of disease and health care costs; and
- improved physical activity that can lead to better physical and mental health.

International Context

- Australia is party to several global agreements committing to halt the dangerous loss of biodiversity with the United Nations, the International Panel for Climate Change (IPCC), International Panel for Biodiversity and Ecosystem Services (IPBES), and RAMSAR Convention of Wetland Protection.
- UN COP15 Biodiversity Conference (Kunming-Montreal Global Biodiversity Framework) adopted an agreement to protect 30% of the world's land and oceans by 2030, to restore degraded ecosystems, and to end extinctions by 2050. The Australian Government led the way.
- 2021-2030 is the UN Decade for Ecosystem Restoration that aims to prevent, halt, and reverse the degradation of ecosystems across the world.
- International agencies, such as The World Bank and the International Union for Conservation of Nature, specify that critical habitat should not be disturbed if the disturbance will result in loss more than 5% of the area of the critical habitat. They recommend the preparation of a



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Biodiversity Action Plan to address the environmental, social, cultural, scientific and economic issues associated with a reduction in biodiversity arising from project implementation.

Summary and Recommendations

WSWA believes the State Government should deliver on the intent of the community when it stopped the development of Roe 8/9 after its election to government in 2017. Then, as it still is now, the community voiced a desire for the corridor of land set aside for Roe 8/9 to be retained as a vegetated corridor linking the ocean to the wetlands of the Beeliar Regional Park. The Cook Labor Government needs to listen again to the community, through the WAPC by:

1. Rezoning the ENTIRE Roe 8/9 corridor as Parks and Recreation (P&R).
2. Establishing an ecological green corridor extending from the Beeliar Wetlands to the Indian Ocean and incorporated into the Beeliar Regional Park.
3. Incorporating the land at the intersections of Forrest Road with North Lake Road and Stock Road into the Green Corridor and rezone as P&R.
4. Extending the Green Corridor to incorporate the land in the Fremantle Rockingham Access Corridor (at the north and western edge of Manning Park) and rezone P&R.
5. Complying with local, state, federal and international environmental legislation, agreements, policies, and guidelines that affect our urban ecology.

WSWA looks forward to discussing the future of this corridor with the WAPC in the near future.



<http://www.wildflowersocietywa.org.au/>