



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

20<sup>th</sup> January 2023

Chair  
Environmental Protection Authority  
Locked Bag 10  
Joondalup DC WA 6919

Assessment Number: 2357 Garden Street Extension, Southern River, City of Gosnells. Clearing 2.04 ha of native vegetation within a 2.65 ha Development Envelope (DE).

The Wildflower of Western Australia (the Society) submits these comments in relation to the approved clearing of the

- Endangered (En) Federally listed threatened ecological community (TEC) Banksia Woodlands of the Swan Coastal Plain (SCP);
- critical habitat to Black Cockatoos (BCs) particularly the En Carnaby's Black Cockatoo (CBC) and the Vulnerable (Vu) Baudin's Black Cockatoo;
- 0.45 ha of remnant vegetation associated with a Conservation Category Wetland (CCW)
- 1.2 ha of native vegetation within a 'protected reserve', Bush Forever Site;
- the completely inadequate offset management plan and;
- the lack of avoidance in the Mitigation Hierarchy.

The Society wishes to stress upon the EPA the importance and value which is threatened by this proposal, and while we understand that actions must be taken for human safety as traffic volume increases; the answer cannot be at the expense of the remnant and critical vegetation and habitat which is essential to the continuing survival of many species and communities. There are other engineering solutions available to resolve the human safety issues, albeit with economic and social consequences. However, these solutions can be managed. The loss of species and communities that comprise the affected vegetation cannot be effectively managed.

As indicated in earlier submissions to the City of Gosnells, the Society believes that this project cannot be made environmentally acceptable as it is inconsistent with the State Bush Forever policy and it has multiple significant impacts on many MNES and on State listed endangered flora and fauna species and on Threatened Ecological Communities which carry with them an extreme risk of irreparable loss or harm.

The Society is very concerned that this proposal for an 840 metre long four lane road being made through Holmes Street Bushland, Bush Forever site 125 - between Harpenden Street and Holmes Street in Southern River is environmentally unacceptable and contrary to Bush Forever policy to protect all Bush Forever sites.



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### Introduction

The EPA has acknowledged in earlier consideration of this project that project approval would result in the bushland being bisected. For example, the EPA requested of the proponent's consultant: 'Provide further detail and description..... including the cumulative impacts resulting from the bisection of the bushland remnant by existing roads.' (page 5 'EPA comment No. 21, App Q – Response to EPA comments table.pdf').

### Traffic Impact Study

The Garden Street Extension Proposal is advertised as a necessity to increase vehicle and civilian safety by reducing the hazards and risks which are increased by the predicted increase in traffic over the following decades. Table E.1 and Table E.2 in the Traffic Impact Study shows increased traffic in each time progression, supporting the justification for the project. Despite the implementation of this project and associated road upgrade proposals, it will still ultimately lead to induced demand. The proposed action of upgrading roads is reactive to the increases in traffic volume, where the necessary actions for the future of our environment must be proactive. If we continue to be reactive rather than proactive, road upgrades will always be required to accommodate for increasing traffic demands, which will result in continuation of remnant native vegetation and more Bush Forever Sites converted for roads and development. With consideration to the mitigation hierarchy, the Society requests that actions of avoidance are considered that address the issue of induced demand and create a more secure future for our environment. The proponent's accountability is non-existent, the mitigation hierarchy has been ticked off by simply starting with a larger development envelope than evidently required for this project. The proponent needs to attempt other methods of reducing traffic volume rather than simply reacting and accommodating to traffic demands. Some examples may include;

- ceasing Perth's urban sprawl by designing homes that utilise vertical space without reducing dwelling size and not building more land developments which require these road upgrades *"north-south link to potential land development, which is over 600 ha in size"* (5413AD\_Rev 6, 2023);
- focusing on public transport connectivity (not at the detriment to remnant vegetation);
- encouraging the use of public transport by subsidising costs and allowing electronic payment;
- acquisition of land for a suitable road corridor and adequate compensation of the affected landholders and households to enable the construction of a road to meet existing traffic demand and provide for expansion to meet future demand.

This project and associated proposals will simply encourage road usage by motor vehicles with the increased ease in self-transport. This encouragement will cause more vehicles to use these road upgrades causing the traffic volume to increase and traffic flow to decrease once again back to the original state. As Western Australia should be committed to reducing emissions with impending global warming, clearing our natural carbon sinks and heat absorbers is contradictory to what all scientific advice has shown. Avoidance mitigation has not been addressed nor assessed appropriately and must be revised and resubmitted.



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### Bush Forever

The assessment that the impacts on Bush Forever Site 125 are '*not considered to be a significant impact*' where SPP 2.8 defines Bush Forever areas as a '*classification of land in the Metropolitan Region Scheme to protect and manage **regionally significant bushland** in accordance with the policy*' (DPLH). is completely contradictory. Any proposal which results in an altered Bush Forever Site, should automatically be considered as significant, and assessed with protection and management as a fundamental consideration according to SPP 2.8. The Society is greatly concerned over the ease in which Bush Forever sites are approved for clearing, and the name 'Bush for Now' seems to be increasingly more suitable – may be should be termed "*always was, but never will be, forever*".

As the EPA is aware, these Bush Forever sites are representative of regionally significant bushland areas that are planned to protect at least 10 % of each vegetation complex, where 10% remains. 'Bushland conservation not only fulfils a moral obligation to protect habitats from destruction and save species from extinction...' (Bush Forever Volume A p vii).

The construction of this project will result in the fragmentation of Bush Forever Site 125 and as a consequence decrease the function size of the remnant habitats, result in an increase in the overall edge length and the subsequent cost of management, as well as increased isolation, potential for vehicle strikes, light pollution, noise interference, direct and indirect loss of species, loss of habitat and associated food sources, and wetlands, with an increase potential for local extinctions. There is an extreme risk of these outcomes occurring. The consequences of fragmentation in urban remnant vegetation are described by Ramalho et al (2014) and on the WA Museum website. Both highlight the importance of size to the conservation of plants and animals and the detrimental effects which occur through fragmentation.

### Residual Impacts

The wetlands within Site 125 ha a management objective of "Conservation". It is understood from the report by Biologic Environmental that the project area falls within the Southern River vegetation complex, only 1.5% of which is secured in conservation areas in the Perth-Peel region and includes the area within Site 125. Given the Bush Forever objective of retaining 10% of each vegetation complex in conservation areas, **any** further loss of this complex is unacceptable. The Sumpland classified as a CCW is a wetland type which 'may be poorly represented in the conservation reserves system (p 3) and part of a significant ecosystem'. In this proposal building a 6 lane road through a CCW Wetland is not protecting the wetland.' The EPA considers a buffer adjoining a wetland or waterway helps to maintain the ecological and hydrological processes and functions associated with the wetland or waterway, and aims to protect it from potential adverse impacts. No consideration has been given in the road proposal to the location of such a buffer and avoiding the wetland or the buffer in the design of the road alignment. Proposals to destroy part of the CCW and its buffers to construct the road are unacceptable.



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Members of the Society have previously carried out bush walks and surveys in the area since 1998. Some photographs taken during the bushwalks (attached) indicate that the condition of the vegetation was ‘Good’ to ‘Excellent’ at that time.

It is understood that only 2 of the 18 *Jacksonia gracillima* (P3) and all the *Styphelia filifolia* (P3) will be lost through implementation of the project. It is also understood that the 15 *Caladenia huegelli* recorded at the site until 2004 have not been recorded since that time, and were not sighted in recent surveys for this project. Also, a number of the species and communities gazetted under the EPBC Act are not considered by the EPA, as they have no legal protection under the WA Biodiversity Conservation Act. The approved conservation advice for these areas/species requires the approaches to achievement of their conservation objective is to protect, restore and communicate with and support the increased understanding of the value and function of the ecological community. Actions inconsistent with these approaches should not be undertaken.

The proponent’s consultant (360 Environmental) states the clearing of no more than 2.04 ha of native vegetation will have a significant impact. No account is taken of the significance of the indirect impacts or the cumulative impacts in this assessment. Nor are they taken into account in the determination of any offsets.

### **Cumulative Impacts**

There is no discussion of the cumulative impacts of this project on the local or regional environment.

The Society is aware of at least 5 projects in this area which have/will result in loss of CCW in the area, including the Perth Surf Park, the Maddington Kenwick Strategic Employment Area, Princep Road in Jandakot and, more regionally, Lot 123 Mortimer Road in Casuarina and the Westport Freight Access Route.

Similarly, there are a number of sites where Banksia woodland is being cleared for land development in the local and regional area, yet this proposal does not reflect on the cumulative impact this proposal may have when considered in relation to these other projects.

### **Offsets**

The Society does not support the concept of offsets. A recent report on the value of offsets associated with projects referred under the EPBC Act found them to be ineffective and subject to manipulation resulting in no area being set aside to compensate for losses that occurred.(

<https://epbcactreview.environment.gov.au/resources/interim-report/chapter-8-restoration/81-environmental-offsets-do-not-offset-impacts-developments> cited 29/01/2024)

### **Offset Site 1: Webster Park**

It’s stated that “*The City intends to counterbalance significant residual impacts*” (93) done through the conversion of an industrial lot to a conservation Public Open Space (POS) reserve of a different



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vegetation community to SCP23a (En) and majority in Excellent condition. The Society fails to comprehend how this is an action of counterbalance when the total vegetation at the end of the project's lifespan will be lower than prior to the project's commencement. The City's commitment to the *"ongoing management of the reserve through weed control, removal of rubbish revegetation and infill planting as required"* again should not be considered any action of counterbalancing as this was land already owned by the City and should have been under the management and protection from surrounding activities to preserve such high-quality vegetation. The only threat to Webster Park was the development into a business industrial park by the City itself.

It is inappropriate to accept this offset as it will still result in a net loss for Black Cockatoo foraging habitat and presents no accountability or responsibility to the City when clearing a Federally listed threatened ecological community and invaluable habitat to the survival of Carnaby's Black Cockatoo (CBC) (*Zanda latirostris*), Endangered (EPBC Act). To 'counterbalance' something means to *"neutralise or cancel by exerting an opposite influence"*. So, if there are two reserves of Very High valued foraging habitat to Black Cockatoos, and one of those reserves is then cleared, then at what point does the action of counterbalancing occur?

The vegetation in offset site 1 is not representative of the Endangered Banksia Woodlands of the SCP TEC, thus the 'protection' (from the CoG's own actions) does not 'offset' the proposal's clearing of this TEC. The purpose of a 'buffer area' is to act as a layer of protection surrounding vegetation and habitat, and to absorb the threats posed by surrounding happenings, such as the edging effect. Therefore, planting around SCP20a to act as a buffer zone cannot be included as an offset to clearing, it is part of the protection of the TEC to prevent SCP20a from further degradation and decline in size within offset site 3. Therefore offset site 3 should only be considered as 0.47ha, which still does not increase the resulting vegetation quantity or 'replace' the cleared floristic community type FCT23a.

### Offset Site 2: Bullfinch Site

The need to revegetate the buffer areas surrounding the wetland areas to restore them to the CCW management category is at the onus of the City as the owners of this land. Thus it is hardly acceptable to consider this as a 'counterbalancing' action for the destruction and clearing of CCW vegetation.

### Offset Site 3: Orange Grove Trotting Track

The same principles outlined above for Offset Site 1 directly apply to Offset Site 3. No land was purchased as it was already owned by the City, and therefore the only threat to the destruction and removal of the wetlands was the City itself. This land should already be subject to the City's management and protection from further degradation, and therefore provides no 'counterbalance' to clearing remnant vegetation.

The usage of floristic and fauna data from 2010 is unacceptable. If the reports of the updated spring 2023 flora and vegetation survey and targeted black cockatoo assessment are not yet available, then suitability of offset sites can hardly be confidently determined and therefore publicly reviewed for



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appropriate comment. This application should not have been submitted and open for public comment until all necessary information was provided including an updated suitability assessment. The Society seeks that this omitted information is released and the public review period is reopened so a comprehensive understanding of the proposal can be sought.

### Community

This proposal has given a complete lack of attention to the value which bushland and its dependant inhabitants provides to the local and regional community. Community is used to support the project's justification by increasing safety and ease through faster traffic flow, but concerningly does not address the benefits which are already present without this proposal. The Society would like to ensure that this is an added point in the EPA's consideration when assessing this proposal and allows the benefits of this bushland to humans to play a larger role than acknowledged by the proponents. *"The ecological community also provides ecosystem services and contributes to the health and wellbeing of local residents. For example, the woodlands help cool temperatures in the surrounding region; store carbon; filter and maintain aquifers, including those supplying drinking water for Perth; mitigate local flooding, soil loss, and pollution; and, provide amenity and recreation such as scenic areas for bushwalking."* (CoA, 2016). Our efforts should be heavily focused on how to curb the effects of climate change and cease further progression. This proposal contradicts where our efforts should be by clearing areas that assist to mitigate rising temperatures and natural carbon sinks (offsets are not applicable in this proposal as the total vegetation is still dramatically lower post project), to encourage more vehicle and emission usage. This bushland also provides great recreational value to residents, which cannot be undermined.

### Summary

The Wildflower Society of Western Australia expresses our deepest concerns over this proposal and the environmental future of Western Australia. We implore the EPA to not accept the significant and irreversible impacts that will result from this proposal and associated future proposals and request that this approval is overturned and **not permitted**. This is not one project alone, but the continuation of road upgrades and additions that will never cease. This is supported in the traffic impact study where capacity is still reached in the scenario with this approved project as early as 2031 (Table E.1). This project will clear essential vegetation and habitat to multiple species and communities that are facing extinction in the very near future. If we don't stop now, when will we? This proposal shows the flaws in vegetation offsets by allowing the end result to be a drastic loss in vegetation and habitat yet remain compliant with the EPA's guidelines. The proponent's accountability has been ignored in the creation and assessment of this project, where the mitigation hierarchy has been ticked off by simply starting with a larger development envelope than evidently required for this project, rather than attempting proactive actions of reducing traffic volume. The Society submits our comments on proposals to represent the voiceless and the dismissed, conserve and preserve the remnant vegetation post significant clearing, halt Western Australia's rapidly declining biodiversity and species' populations, provide a future for not only our native species but for all of us by using our natural resources to combat climate change, and allow endless future





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generations the opportunity to experience WA's natural environment and its inhabitants. The Society hopes that the dismissal of this and accompanying proposals, ignites efforts by councils and government to start taking proactive steps and finally prioritise our dwindling vegetation, so our society can continue to thrive, but to do so with our biodiverse environment.



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

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### Reference

- Commonwealth of Australia. (2016). Banksia Woodlands of the Swan Coastal Plain: a nationally protected ecological community. Referenced: (CoA, 2016).  
DPLH., WAPC. Bush Forever Fact Sheet.  
360 Environmental Pty Ltd. (2023). Garden Street Extension, Southern River Section 38 Environmental Protection Act. City of Gosnells. Referral Supporting Document.  
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360 Environmental Pty Ltd. (2023). Garden Street Extension, Southern River Offset Strategy. City of Gosnells. Referenced: (5413AA\_Rev3, 2023).  
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### Photos







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