



## WA Environment Groups joint position on the Strategic Assessment of the Perth-Peel Region

October 2017

### Introduction

The Perth-Peel region is located in the South West Global Biodiversity Hotspot; named for the internationally significant biodiversity facing very high levels of threat. The recent listing of the Banksia Woodlands of the Swan Coastal Plain (the dominant native vegetation type in this region) as a Threatened Ecological Community demonstrates that a business-as-usual approach to planning and development will see the ecological values of the region permanently and irreversibly degraded.

The Strategic Assessment of the Perth Peel Region (SAPPR) is one of the most significant and ambitious environmental policy initiatives to ever be undertaken in Western Australia. It represents a unique opportunity to provide protection for the unique biodiversity of the region for future generations; to deliver a more energy efficient, sustainable and healthy city; and to provide greater certainty for business and community. **For these reasons the strategic assessment approach underpinning the SAPPR process is supported by environment groups.**

The alternative to a strategic approach is a continuation of business-as-usual which has so far delivered poor conservation outcomes. **Environment groups do not support this approach which will inevitably lead to a 'death by a thousand cuts' for our biodiversity.**

Unfortunately, the draft SAPPR released by the Barnett Government under the title '*Green Growth Plan*' misses the unique opportunity outlined above as it falls short or fails completely in a number of key areas. The process employed under the Barnett Government has lacked rigour and transparency and environment groups consider the Plan's projected impacts on the region's biodiversity unacceptable and inconsistent with responsibilities under State and Commonwealth environmental legislation.

**We call on the Government to commit to undertaking a significant revision of the draft Strategic Assessment to deliver protection of the biodiversity of the Perth and Peel Region as detailed in this paper.**

As part of this review, significant data gaps must be addressed, comprehensive public consultation should be undertaken, interim arrangements must be put in place and improved governance arrangements must be established.

We believe that to pass the test of effectiveness and credibility, the specific areas of concern outlined on the following pages must be addressed through the review process.

### **1) Significantly reduce the net area of native vegetation loss**

A key test of the SAPPR process will be how much native vegetation is allowed to be cleared under the resultant plan. The clearing area proposed under the current Draft GGP of native vegetation including TEC-listed banksia woodland is totally unacceptable from an environmental perspective. It fails to preserve sufficient habitat for the maintenance of populations of MNES endangered species, goes against the principles of environmental sustainability, breaches the recovery plan for Carnaby's Cockatoos and fails to account for the recent protection of this vegetation type under the EPBC act.

**A reviewed SAPPR must deliver a Comprehensive, Adequate, and Representative (CAR) system of reserves in the region which are protected through secure land tenure.** This should include:

- Complete implementation of Bush Forever including the permanent protection of all Bush Forever Areas as part of the conservation reserve system
- Protection of Peel Regionally Significant Natural Areas
- Implementation of all Regional Park recommendations, noting that Peel Regional Park welcomed but inadequate for MNES and internationally significant biodiversity
- Transfer of all the above areas to A-class reserves for the purpose of conservation with no depth limits applied (thus no exploration, mining or infrastructure permitted)
- Immediate commencement of the above conservation measures to ensure timely delivery, unlike the long delays envisaged in the draft Strategic Assessment.

### **2) Protect and restore all threatened species, their habitats and threatened ecological communities.**

All species and ecological communities listed as threatened or priority that occur in the SAPPR region should be reviewed to determine current conservation status and population viability within the region. Such analysis must also examine species and communities that are not currently listed but which may be subject to future listings.

The final SAPPR must meet the conservation outcomes identified in the Recovery Plans for Carnaby's Black-Cockatoo, Western Ring-tailed Possum and other MNES; including:

- No loss of population numbers at the level of the Perth-Peel region
- No reduction in range within the Perth Peel region
- No reduction in the nesting/roosting and foraging habitat within the Perth-Peel region
- No further loss of Banksia Woodlands and other TECs and Threatened Species
- No further loss of Tuart Woodlands.

### **3) Protect the ecological values of rivers, wetlands and groundwater dependent ecosystems.**

The rivers, wetlands, estuaries and groundwater in the SAPPR region are subject to very significant threats from pollution, abstraction and other forms of degradation that is often associated with development pressures.

To be successful the SAPPR must:

- Protect and restore all wetlands and their buffer zones in the Perth-Peel Region
- Protect and restore ecological values of the Swan-Canning River system and the Peel-Harvey system by addressing nutrient runoff and other threats to water quality. These actions must achieve the nutrient reduction targets established in the Water Quality Improvement Plans for these systems
- Address over abstraction and unsustainable use of groundwater, and ensure all groundwater use is licensed and metered.

#### **4) Ensure adequate resourcing is provided for ongoing science and management of environmental values by government**

It is critical that adequate resourcing is provided for management of conservation areas and for addressing the impacts which degrade the ecological values in these areas. This must be included in a financial implementation plan for the SAPPR. The introduction of a 'Regional Improvement Tax' (RIT) similar to the Metropolitan RIT, and / or increase the Metropolitan Region Improvement Tax (MRIT) rate may be required so that ongoing funds can be obtained through developer contributions.

Increased funding should be set aside for:

- Science to inform conservation management, planning and decision-making by government agencies and land managers
- Management of the conservation estate and remnant vegetation on public lands including managing visitor impacts.
- Assistance and incentives for management of environmental values by private landholders.
- Management of broad scale threats to biodiversity outside of the conservation estate such as nutrient pollution, wastewater management, weeds, fire, feral animals, etc.
- Community education to promote the protection and valuing of natural areas.
- Provide Landcare funding in Peel-Harvey catchment and Swan-Avon catchment.

#### **5) Apply sustainable urban development and planning concepts to deliver a compact, connected network city.**

The SAPPR is a unique opportunity to turn the corner from unsustainable urban sprawl in the Perth Peel Region to develop into a series of compact, sustainable urban centres with connectivity by public transport.

A compact urban footprint with no further expansion would avoid clearing of native vegetation, support stronger communities, reduce environmental impacts and reduce the cost burden to State and Local Government. This can be achieved through:

- An urban growth boundary or similar constraint on urban sprawl should be considered as part of the review of the SAPPR. the Perth METRONET plan should provide the transport network to locate all future urban development around
- Urban forest concepts should be used to reduce urban heat island effects and should include mandatory targets for forage plants of threatened species (eg for Carnaby's Cockatoos)
- Government acquisition of lands that have been historically purchased, or planned for development where they have high biodiversity values and are not consistent with the development of a sustainable network city. For example, Banksia woodlands on the urban fringe
- Use of building codes and other policy instruments to ensure new building design is sustainable, energy and water efficient and reduces the demand for basic raw materials.

#### **6) Establish effective governance, implementation and enforcement measures.**

The various governance arrangements to deliver the SAPPR must be specified, including primary accountability for the delivery of the different elements of the plan. Effective governance measures should include:

- An 'Implementation Advisory Group' must be established which includes community representation (eg similar to Air Quality Plan) and which is resourced to undertake periodic public auditing of implementation.
- All plans for conservation estate must have identified management and vesting arrangements.
- Conservation commitments must be legally binding through enforceable conditions on State Government agencies and other parties, with effective and adequately resourced enforcement capacity.
- A guaranteed regime and resources for monitoring of SAPPR implementation by an independent body, including mandatory public release of monitoring reports and data.

## **Interim Arrangements**

Due to the lengthy SAPPR process and the ongoing loss of significant biodiversity values, interim actions must be put in place to prevent further loss of biodiversity due to existing and planned activities before the SAPPR comes into force.

This should include an immediate moratorium on clearing of lands with high conservation value including:

- the Gngangara pines feeding and roosting habitat of the endangered Carnaby's Cockatoo
- Banksia woodlands of the Swan Coastal Plain ecological community (MNES Threatened Ecological Community).
- Tuart woodlands of the Swan Coastal Plain (MNES priority assessment list).
- vegetation within the Peel-Harvey catchment (MNES Ramsar wetland and other values).
- All Bush Forever Areas.

Measures must remain in place to ensure that no mining or petroleum tenements, and no clearing applications or other development approvals are granted over areas proposed for conservation.

## **Consultation**

It is essential that further community consultation is undertaken to enable the SAPPR process to take into account community values and knowledge of biodiversity within the SAPPR region.

At a minimum, a further 3-month consultation process should be undertaken. This must include publicly available detailed and accurate mapping with biodiversity and conservation estate information, including at a minimum:

- Areas of habitat that support MNES (Matters of National Environmental Significance) species or State threatened species.
- State & Commonwealth listed TECs (Threatened Ecological Communities)
- BFA (Bush Forever Areas)
- Peel RSNA's (Regionally Significant Natural Areas)
- All wetland types including CCWs (Conservation Category Wetlands) and Resource Enhancement wetlands
- Sites covered by International treaties (eg RAMSAR, JAMBA, CAMBA),
- Regional Parks
- Areas that will be permitted to be cleared and their biodiversity values