

13 May 2016



Environment Institute
of Australia and
New Zealand Inc.

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

Sent via email to consultation@dpc.wa.gov.au

Dear Sir/Madam

Submission to the Draft Perth and Peel Green Growth Plan for 3.5 million

The Environment Institute of Australia and New Zealand (EIANZ) is a not-for-profit, professional association for environmental practitioners from across Australia and New Zealand. The EIANZ supports environmental practitioners and promotes independent and interdisciplinary discussion on environmental issues. It also advocates environmental knowledge and awareness, advancing ethical and competent environmental practice. Our members come from all areas of environmental practice and are at the forefront of challenging and complex issues such as climate change, sustainability and preserving biodiversity.

The EIANZ (WA division) offers its comments on the Green Growth Plan in the context of its commitment to excellence in environmental practice, characterised by:

- The protection and enhancement of the environment for future generations through leadership in avoidance and mitigation of harms and adaptation to change;
- The preference given to the integrity and resilience of biological systems essential to the sustained wellbeing of human beings;
- Honest, objective and well-founded environmental practice based on scientific evidence;
- Environmental practice that goes beyond the minimum legal requirements; and
- Environmental practice that is multidisciplinary and collaborative, integrating knowledge across domains and between stakeholders.

The EIANZ wishes to emphasise the importance of protecting the unique environmental values of the Perth and Peel regions. These regions sit within one of the world's 35 internationally recognised biodiversity hotspots - places that are the most irreplaceable and threatened. As noted in the GGP documents, the south-west of WA contains almost 3000 endemic flora species, more than 80 endemic fauna species and retains 30 per cent of its original cover. The area covered by the GGP contains 91 matters of National Environmental Significance (MNES) listed under the *Environment Protection and Biodiversity Act 1999* (EPBC Act), including threatened plants and animals, threatened ecological communities (TECs), wetlands, migratory shorebirds and heritage sites.

It is the EIANZ's view that the future development of Perth and Peel should proceed in a way that ensures these unique environmental values and nationally protected matters are not significantly negatively impacted.



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The Institute therefore supports the use of evidence-based tools, systems and processes that will integrate environmental considerations into planning processes. The EIANZ considers that the use of strategic assessments as provided for under s146 of the *Environment Protection and Biodiversity Conservation Act 1999* has the potential to reduce red-tape and achieve better long-term environmental and planning outcomes as compared to project-by-project assessment.

In addition, the EIANZ considers a well-designed, consolidated and connected urban form will avoid the urban sprawl that has historically characterised development in the Perth and Peel regions, reduce the demand for basic raw materials and minimise the need for clearing of native vegetation. It also strongly supports the co-location of infrastructure to reduce costs, increase efficiency and as a means of minimising environmental impacts.

The EIANZ also supports the development of a GGP as a means of ensuring the sustainable development of the Perth and Peel regions. It acknowledges the complexity involved and commends the WA government for its commitment to the process.

It is the EIANZ's view however, that the draft GGP falls short of achieving the above objectives and **does not adequately address the impacts on, and risks to, the environmental values of the Perth and Peel regions**, as defined in the Commonwealth EPBC Act (1999) and State Environmental Protection Act (1986). **Changes to the Plan are required** to achieve the intent of the Section 146 (1) Strategic Assessment Agreement between the Commonwealth and the State and to meet the recommendations of the Environmental Protection Authority's interim Section 16(e) strategic advice.

While the EIANZ supports in principle the conservation measures proposed in the GGP, including commitments to:

- 170 000 ha of new and expanded conservation reserves;
- measures to reduce nutrient run-off in the Swan Canning and Peel-Harvey estuaries; and
- a program of on-ground management to improve the protection of threatened species, wetlands and ecological communities.

It does not consider they are sufficient to achieve acceptable environmental outcomes.

In particular the Institute considers the draft GGP and Impact Assessment Reports:

- do not provide adequate qualitative information regarding impacts, except in relation to Carnaby's Black Cockatoo;
- will have an potentially catastrophic impact on Carnaby's Black Cockatoo, a species already under threat from habitat loss and listed as endangered under the EPBC Act;
- will need to be amended to provide a secure protection and management proposal for the Peel-Harvey and Peel-Yalgorup Ramsar Site commensurate with their nationally and internationally significant values, and
- does not have an adequate focus on adaptive management.



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The EIANZ recommends changes be made to the GGP to:

- provide a more detailed quantitative analysis of the impacts of development classes of action and conservation measures;
- reduce the impact on Carnaby's Black Cockatoo below the level of significance¹
- reduce the clearing of native vegetation through greater avoidance and mitigation;
- increase the emphasis on habitat creation of revegetation, and particularly foraging habitat for CBC
 - other than the planting of 5000 ha of pines, the existing GGP relies heavily on the acquisition of existing land that is already utilised by CBC;
- establish a secure funding mechanism to adequately resource the management and monitoring of all newly created conservation reserves;
- reduce the demand for basic raw materials;
- establish specific monitoring, contingency thresholds and adaptive management responses, including a mechanism to deal with new listings; and
- provide details of the changes to the planning processes that will be required to implement the GGP.

The EIANZ considers the most viable way to reducing impacts is to pursue a more compact, higher density development footprint that avoids any significant clearing of native vegetation. This will also reduce the demand for basic raw materials.

In addition the EIANZ considers that it is essential the GGP is adequately funded over the life of its operation and offsets are managed in perpetuity. It is noted that there has been no information provided regarding the funding commitment or mechanism.

The EIANZ considers that these changes would enable the GGP to would achieve its objective of accommodating a future population of 3.5 million while protecting the unique natural environment for future generations.

I look forward to hearing from you soon and please call if you have any queries.

Yours sincerely

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¹ Matters of National Environmental Significance, Significant Impact Guidelines 1.1, *Environment Protection and Biodiversity Conservation Act 1999*