Enquiries: Jane O'Malley
Our Ref: 2021\_01\_22

Your Ref: PA20/1197:0C20/31337

File Ref: CS\_400

22 January 2021

Shire of Serpentine Jarrahdale 6 Paterson Street Mundijong WA 6123

Emailed to: info@sjshire.wa.gov.au



PHCC is a community based, Natural Resource Management (NRM) regional body working across the Peel-Harvey NRM Catchment, covering over 1.1 million hectares of the Serpentine, Murray, Hotham, Williams and Harvey River catchments.

The PHCC acknowledges the planning and zoning history of the West Mundijong site and its significance to the Region. The PHCC also acknowledges the threats and opportunities posed by the Structure Plan to the Ramsar listed Peel-Yalgorup wetland system and on the Black Cockatoo population.

The PHCC notes that the Structure Plan in the Policy section states that "Subdivision shall be generally consistent with the structure plan, including the following supporting documents: Environmental Assessment report ... Local Water Management Strategy".

The PHCC position is that the following elements should be given **great weight under the Structure Plan to ensure that they are implemented at the time of subdivision** (each subdivision stage).

### 1. Water Quality

The PHCC acknowledges the desire, as outlined in the Local Water Management Strategy, that flows leaving the site should be as per pre-development levels. Given the significance of the site in terms of scale, the PHCC considers that the Structure Plan should be more ambitious and require that the water quality leaving the site be **an improvement upon the existing conditions**, particularly in relation to phosphorous. This could be achieved via the use of high P retention soil amendments which should be used in conjunction with any imported fill for the future lots and should be incorporated into the rehabilitation of the proposed ecological linkages.

These requirements should be more clearly defined in the Policy section of the Structure Plan and/or adopted as a Policy by the Shire under the Town Planning Scheme, to ensure that this aspiration is not lost and is included as a condition of each stage of subdivision.



58 Sutton Street, Mandurah Western Australia 6210

**Together** 

Peel-Harvey Catchment Council

T: +61 8 6369 8800

#### 2. Fill for lots

Most of the area is reliant on fill to lift buildings above the flood prone areas. Buildings are areas which require attention to reduce the impact of nutrients applied which are associated with effluent disposal and gardens. Using a fill that has a high P retention capacity or modified to increase its P retention capacity is required to reduce the P leaching from the area of the building envelope.

# 3. Ecological Corridors

The PHCC considers that the northern Ecological corridor, the extension of the Manjedal Brook Conservation classification area, and the southern Ecological Corridor (south of Sparkman Road), should consist of the drainage swale and then a 30 metre buffer (on each side) from the top of the bank. Figure 27 in Part 2 of the Structure Plan, suggests that these buffer areas are potentially less. Greater clarity is required to ensure that area can effectively work as an ecological corridor. Any bushfire mitigation works should occur beyond the 30 metre buffer.

High P retention soil amendments should be used in the ecological corridors to increase the nutrient stripping process.

Vegetation planting with these corridors ought to assist with the black cockatoo foraging and habitat and should include a variety of fast growing species (to provide foraging source as soon as practical) and more traditional and slow growing species (preferred foraging and breeding trees). Artificial hollows for breeding should also be incorporated into the corridors. See below for additional comments relevant to black cockatoos.

#### 4. Multiple Use Corridors

The northern most Multiple Use Corridor along Bishop Road as shown in Figure 12 (Water Dependent Ecosystem Management) in the Local Water Management Strategy should be more clearly shown on the Structure Plan.

An indicative diagram showing the potential treatment of the northern and middle east-west multiple use corridor should to be included in the Structure Plan to guide future decision makers.

The north-south multiple use corridor should incorporate fast and slow growing species for the three black cockatoo species. This requirement should be incorporated into the Structure Plan.

# 5. Black Cockatoo Species

All forage trees should be retained. Not only are native forage species (marri, jarrah, banksia, hakea, sheoak, grevillea) important to retain but also are non-native species (such as pines, ornamental eucalypts, cape lilac) as the birds may have become reliant on in the area as a food source. If forage trees can't be retained they should be replaced on at least a one:one basis.



Trees greater than 500mm DBH should be retained as this is the size at which hollows form, however it is also important to retain trees of mixed age, that demonstrate natural regeneration and recruitment and therefore capacity for natural hollow replacement over time.

All trees over 500mm DBH (dead and alive) should be assessed for potential breeding hollows and retained if hollows exist. If a tree with a confirmed nesting hollow needs to be removed, an artificial nesting tube should be installed close-by as a replacement, before the existing hollow is removed.

## 6. Ongoing Maintenance and Management

All corridors, drainage areas and open spaces need maintenance and management plans to retain their intent and objectives over time.

Thank you again for the opportunity to comment.

Please do not hesitate to contact me on (08) 6369 8800 or email <u>admin@peel-harvey.org.au</u> if you would like any further information.

Yours sincerely

Jane O'Malley

Chief Executive Officer