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PHCC Working Together
Peel-Harvey Catchment Council

16 September 2022

Department of Planning, Lands and Heritage
Email: SDAUconsultation@dplh.wa.gov.au

To whom it may concern

Submission for Keysbrook Motorsport Development Application not supported in current form – further information required

Peel-Harvey Catchment Council (PHCC) is a community based, Natural Resource Management (NRM) regional body working across the Peel-Harvey Catchment, covering over 1.1 million hectares of the Serpentine, Murray, Hotham, Williams and Harvey River catchments. PHCC promotes an integrated approach to catchment management and the way we protect and restore the environment within the Peel-Harvey catchment guided by our vision of "People Working Together for a Healthy Environment".

With funding provided through the Australian Government's National Landcare Program, PHCC's current projects support a suite of activities and actions that closely align with the Peel-Harvey NRM Strategy – *Bindjareb Boodja Landscapes 2025* and the Australian Government's Threatened Species Recovery Plans and Conservation Advice. The focus is working with the community, landholders and other relevant stakeholders to improve the trajectory of a range of threatened species, including threatened Black Cockatoos across the Peel-Harvey Catchment. PHCC's Healing Bilya - Restoring the Murray and Serpentine Rivers and Ramsar Wetlands and People projects have the objective of improving the health, biodiversity and ecosystem services of the Murray and Serpentine Rivers and the adjacent riparian zones and the Peel-Yalgorup Ramsar 482 site.

Given these interests, PHCC provides comment on the development application for a proposed motorsport facility at 732 Punrak Road, Keysbrook and 146 Wigg Road, Hopeland within the Shire of Serpentine-Jarrahdale. Comments, rationale and recommendations are listed in the following:

<u>Peel-Yalgorup Wetland System</u>
The proposal is within the catchment of the Punrak Drain which flows to the south-west, merging into Lake Amarillo which then feeds into the Serpentine River. The Serpentine River is one of the major rivers which provides the majority of the freshwater flows to the Peel-Harvey Estuary.
The proposed activities are located within the upstream catchment of the Peel-Yalgorup Wetland System. This system was designated as Wetlands of International Importance under the Ramsar Convention on Wetlands in 1990 as Global Ramsar Site 482.

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Based on the Ecological Character Description of the Peel-Yalgorup Ramsar Site (Hale and Butcher 2007) the system meets six criteria for listing as a wetland of international importance, including Criterion 1: The site includes the largest and most diverse estuarine complex in south-western Australia (i.e. the Peel-Harvey Estuary) and also particularly good examples of coastal saline lakes and freshwater marshes.

In 2018, the Australian Government implemented the National Landcare Program / Regional Land Partnerships (NLP/RLP), a $450 million investment over five years to deliver its national environmental priorities. One of the primary outcomes set by the Australian Government through this program was that by 2023, there is a restoration of, and reduction in threats to the ecological character of Ramsar Sites, through implementation of priority actions. Through the NLP/RLP, the Australian Government recognised the importance of actions both in the Ramsar Upstream Catchments as well as within the boundaries of the Ramsar Site. For the Peel-Yalgorup Ramsar Site, the entire Peel-Harvey Catchment was designated as the Ramsar Upland Catchment (see the maps at http://erin.maps.arcgis.com/apps/MapSeries/index.html?appid=c2606f315ee74d899c4f7ae478c29ccc).

The PHCC therefore contends that, as a logical extension, actions which may have adverse effects on the environmental and ecological values of the Ramsar upstream catchments may also have adverse effects on the ecological character of the Ramsar Site itself. The Peel-Harvey Estuary has already been identified as an at-risk estuary by the Western Australian State Government primarily due to nutrient enrichment of its waters and sediments from nutrient-rich water and sediment flowing down from the catchment – see https://www.water.wa.gov.au/water-topics/estuaries/regional-estuaries-initiative. A change in ecological character is defined as the human-induced adverse alteration of any ecosystem component, process and/or ecosystem benefit/service (Ramsar Convention 2005). Four components and processes have been identified as being important in maintaining the ecological character of the Peel-Yalgorup Ramsar Site, namely climate, geomorphology, hydrology and water quality (Hale and Butcher 2007, PHCC in prep). Scientific research has shown us that the estuary is already suffering under existing impacts and management issues of poor water and sediment quality, treatment and disposal of dredge spoil, declining groundwater quantities and quality, declining surface flows in streams and rivers due to climate change, physical disturbance of birds, loss of aquatic and terrestrial flora, loss of habitat for birds and aquatic fauna and pressures from recreational and commercial fishing (for example Valesini et al. 2019).

Given the close proximity of the proposal areas to the catchment of the Serpentine River which provide the majority of the freshwater flows to the Peel-Harvey Estuary, the proposed actions may also adversely impact the water quality and water flow to the estuary, and thereby the ecological character of the Peel-Yalgorup Ramsar Site if not managed correctly. The actions proposed would need to ensure that they will not have an adverse impact on both the hydrology and water quality of the Ramsar Upstream Catchment.

Local Wetlands

Directly adjacent to the southernmost tip of the proposed development site is a constructed wetland that was part of the historic Dirk Brook Project which was focused on nutrient management and reducing harmful inputs to the drainage system. Significant investment in the area occurred through this project because of the nature of the highly drained landscape and the high risk associated with historic and current land use. This proposal would represent a regression in land use as opposed to

an advancement in the context of management practices that are appropriate for the landscape in reducing unwanted inputs to the surface and ground water systems.

It is noted that buffers will be applied to Resource Enhancement Wetlands, however it is recommended that these should also have rehabilitation carried out to improve their ecological function. This would necessarily include adequate ground preparation, weed control (including long term/ongoing) and revegetation with native wetland species. This would provide a filtration buffer for surface and ground water flow and protection of the soil from erosion and weed incursion. Larger buffers should be attributed to the Conservation Category Wetlands in consideration and for protection of their ecological value. Active management of them should also be carried out to avoid weed incursions and other edge effects.

High Value Ecological Sites

There are a number of high (ecological) value properties within a short distance of the proposed development area. Lowlands bushland is 6km to the north, Kingia Conservation property is 3km to the south and Keralup is 2km to the west. All three of these properties have issues with members of the public entering them without permission and carrying out inappropriate activities such as pig hunting, four wheel driving and camping. If more people come into the area, as would happen if this proposal was allowed to proceed, it is highly likely that the occurrence of unsolicited and inappropriate access to and use of private property would increase. Overall, this leads to degradation of plant communities and the introduction of weed and disease species.

Hydrocarbon Management

There are concerns with management of hydrocarbons as the proposal is within a very low-lying wetland environment with direct connection to the water table. There needs to be very high confidence in the surface water treatment processes to ensure no room for error as harmful inputs to the ground and surface water would be irreversible. The precautionary principle would recommend for such a landuse to not be located in this landscape.

Aboriginal Heritage

Aboriginal Heritage where the Aboriginal Heritage Inquiry System shows that the site is close proximity to the Serpentine River (Registered Aboriginal Site 3582) and also to the Karalup Pool which has been named by local Noongar Elders as extremely significant in the context of historical use and current connection to Country (Nannup, pers comm). Even though there has been no specific sites identified on the property proposed for development, given its proximity and presence of wetland areas, Aboriginal Heritage surveys should be carried out to ensure there will be no accidental impact on a currently unidentified Aboriginal Heritage Site.

If you wish to discuss the matter further please contact myself on 6369 8800 or email admin@peel-harvey.org.au.

Yours sincerely

Melanie Durack
Acting Chief Executive Officer
& Operations Manager, Land Conservation & Agriculture

Attachment 1: References

Hale, J. and Butcher, R., 2007. Ecological Character Description of the Peel-Yalgorup Ramsar site. Report to the Department of Environment and Conservation and the Peel-Harvey Catchment Council, Perth, Western Australia.

Peel-Harvey Catchment Council (in prep.). Ecological Character Description for the Peel-Yalgorup Ramsar site: Addendum. A report by Jennifer Hale for the Peel-Harvey Catchment Council, Mandurah Western Australia.

Valesini, F., Hipsey, M., Eyre, B., Kilminster, K., Plummer, P., Elliott, M., Hallett, C., Huang, P. Busch, B., Wells, N., Hennig, K., Cronin-O'Reilly, S., Reshid, M., Krumholz, O., Horsley, J., Trinh, J., 2019. Balancing estuarine and societal health in a changing environment: Summary Report ARC Linkage Project LP150100451, accessed online at https://github.com/AquaticEcoDynamics/Peel_ARC/blob/master/Documents/1.%20Summary%20Report/Peel%20ARC%20Summary%20Report%20v2%2020200624.pdf