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**Nature Reserves Preservation Group  
of Kalamunda, Inc.**

15 Aug, 2023

**TO:** City of Gosnells [yoursay@gosnells.wa.gov.au](mailto:yoursay@gosnells.wa.gov.au)  
All City of Gosnells Councillors [council@gosnells.wa.gov.au](mailto:council@gosnells.wa.gov.au)

**CC:** Chair, WA Planning Commission, David Caddy [David.caddy@dplh.wa.gov.au](mailto:David.caddy@dplh.wa.gov.au)  
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**SUBJECT: SUBMISSION: CITY OF GOSNELLS MADDINGTON KENWICK STRATEGIC  
EMPLOYMENT AREA PRECINCT 2 & 3 B, (Rezone 'General Rural' to 'Business  
Development')**

The Nature Reserves Preservation Group of Kalamunda (NRPG) is a non-profit community organisation which has worked for 30 years to preserve the natural areas in Kalamunda and surrounds, which we recognize are incredibly biodiverse and globally unique. They have been and continue to be subjected to major threats to their survival from extensive clearing, fragmentation and isolation, weed infestation, dieback, feral animals, prescribed burning and Climate Change.

The primary focus in this submission is on the threat to the Greater Brixton Street (GBS) Wetlands and the loss of connectivity between these areas and other surrounding natural areas. (Sections not relevant to this have been excluded from NRPG comment).

**NRPG Comments:**

The NRPG objects to the proposed rezoning, for the following reasons:

- The GBS wetlands are considered by the Beeliar Group of Scientists <https://thebeeliargroup.com/>, (Prof Lambers et al) at the University of Western Australia as "A Jewel in the Crown of a Global Biodiversity Hotspot", "well-known for its species richness and endemism, home to numerous Declared Rare Flora and Priority species as well as Threatened Ecological Communities" (<https://www.wanaturalists.org.au/product/a-jewel-in-the-crown-of-a-global-biodiversity-hotspot/>). There is no other place in the world like it, and this rezoning is a further threat to the survival of these wetlands, additional to the impacts of the existing MKSEA development.
- This proposed rezoning and development is a threat to the proposed "Yule Brook Regional Park which has been a long-standing proposal to the WAPC, EPA and DBCA since 2018, and earlier the Hepburn-Stephenson Plan (1955) also recognized the need

for multiple 'regional parks'. ( <https://www.danieljanmartin.com/projects#/yule-brook-regional-park/>, <https://research-repository.uwa.edu.au/en/activities/vision-for-a-future-yule-brook-regional-park> , Attachment 1 and Reference 1). Any threat to the wetlands and surrounding buffer areas is contrary to this, and also to the potential 'rebuilding of nature' in accordance with the Federal Government's "Nature Positive Plan" in the effort to address the dire State of the Environment Report 2021.

- It is contrary to the EPA report "Perth and Peel @ 3.5 Million: Environmental impacts, risks and remedies" Interim strategic advice of the EPA to the Minister for the Environment under section 16(e) of the Environmental Protection Act 1986, published in July 2015. On page 6 of this document the EPA states "Recommendation 5: that the WAPC protects Conservation Category Wetlands and minimises the potential impacts on Resource Enhancement Wetlands, including their buffers, at structure planning and subdivision design stages. Relevant agencies to finalise a whole of Government policy for the identification and implementation of wetland buffers"
- It threatens the survival of Declared Rare Flora in the GBSW, including extinction, which is contrary to the Minister Plibersek's commitment to no new extinctions.
- The Graeme Samuels Report on the Environmental Protection and Biodiversity Conservation (EPBC) Act revealed serious flaws with the Act and called for a major overhaul, which the Federal government is now undertaking. Any decisions or environmental assessments should not be made until after the overhaul of the EPBC Act has been completed, and is in effect. To do otherwise is to use known flawed legislation, which would be irresponsible.
- The lack of adequate and large setbacks/buffers from the wetlands will destroy the sense of place, cause additional pollution from light spillage, noise, contamination and rubbish on the GBS wetlands, has not been considered.
- This proposal would cause further isolation of significant natural areas and loss of potential linkages such as Wildlife corridors. It is unfortunate that an opportunity has been missed to 'connect' the wetlands (at the intersection of Roe Highway and Welspool Road), with the GBS Wetlands by reconstructing a 'wildlife corridor' through the degraded land between them, as marked on the map below.



- This proposal lacks consideration of the increasing impacts of Climate Change and 'heat islands' on humans and adjacent natural areas.
- It does not account for the long-term cumulative impact of land clearing, development and drainage on hydrological function and how that puts the GBS Wetlands at risk.

The NRPG also acknowledges and supports the detailed concerns in the submission by Professor Hans Lambers FAA FRNAS Emeritus Professor at University of Western Australia (Friends of Alison Baird Reserve): ***Response to "Buffer Assessment, Maddington Kenwick Strategic Employment Area, Precinct 2 and 3B, Project No: EP20-073(06)—009"***

### **Conclusion and Actions:**

The NRPG urges the City of Gosnells to take responsible custodianship of this irreplaceable, unique 'biodiversity hotspot', by the following:

- Act on the advice and recommendations in the submission by UWA Professor Hans Lambers (referenced above) and Scientists of The Beeliiar Group, who have a deep long-term understanding of the details of the Greater Brixton Street Wetlands.
- NRPG further supports submissions from; Birdlife WA, Friends of Brixton Street Wetlands, Save the Great Brixton Street Wetlands Alliance, The Leeuwin Group, The Wetland Conservation Society, Urban Bushland Council of WA, Wildflower Society WA.
- Withdraw the proposed Amendments and change them such that it does not threaten the potential for a Yule Brook Regional Park, (attachment 1) and incorporate this into future plans by the City of Gosnells. This means zoning Precinct 3B (ie west of Brook Rd) to "Public Open Space/Conservation", plus providing a generous buffer (200m at least) along the east side of Boundary Rd (Precinct 2) sufficient to not endanger the long-term health and hydrology of the GBS Wetlands, nor destroy the sense of place.
- Any development must not allow light spillage or other pollution to enter the area of the proposed Yule Brook Regional Park.

Sincerely,

Steve Gates  
President, Nature Reserves Preservation Group Inc.  
0400-870-887

Attachment 1: "A Regional Park for the Greater Brixton Street Wetlands", Prof. Philip J. Jennings, 2018 (Excerpt 1<sup>st</sup> two pages)

Reference 1: "Environmental values and pressures for the Greater Brixton Street Wetlands on the Swan Coastal Plain, Advice in accordance with section 16(j) of the Environmental Protection Act 1986, Western Australia", Environmental Protection Authority 2022.

<https://www.epa.wa.gov.au/environmental-values-and-pressures-greater-brixton-street-wetlands-swan-coastal-plain>

# A REGIONAL PARK FOR THE BRIXTON STREET WETLANDS

*Philip J. Jennings*

## BACKGROUND

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IN APRIL 2018, THE BEELIAR GROUP – Professors for Environmental Responsibility put forward a proposal to the Western Australian Government to establish a Yule Brook Regional Park (Fig. 1). The proposed Park would include the Greater Brixton Street Wetlands (Fig. 2), Hartfield Park, Alison Baird Reserve (Fig. 3) and bushland along the course of Yule Brook and Crystal Brook from Lesmurdie Falls to the Canning River (Figs 4, 5).

The rationale behind this proposal is that it would provide for integrated management of a very diverse biological corridor, linking two existing major reserves, Lesmurdie Falls National Park and the Canning River Regional Park. It would also help to protect the ecological corridor along Yule Brook and the rare and exceptionally high biodiversity of the Greater Brixton Street Wetlands, which are a significant component of the internationally recognised Southwest Australian Biodiversity Hotspot (Myers *et al.*, 2000; Mittermeier *et al.*, 2011), but are under considerable pressure from proposed urban and industrial development.

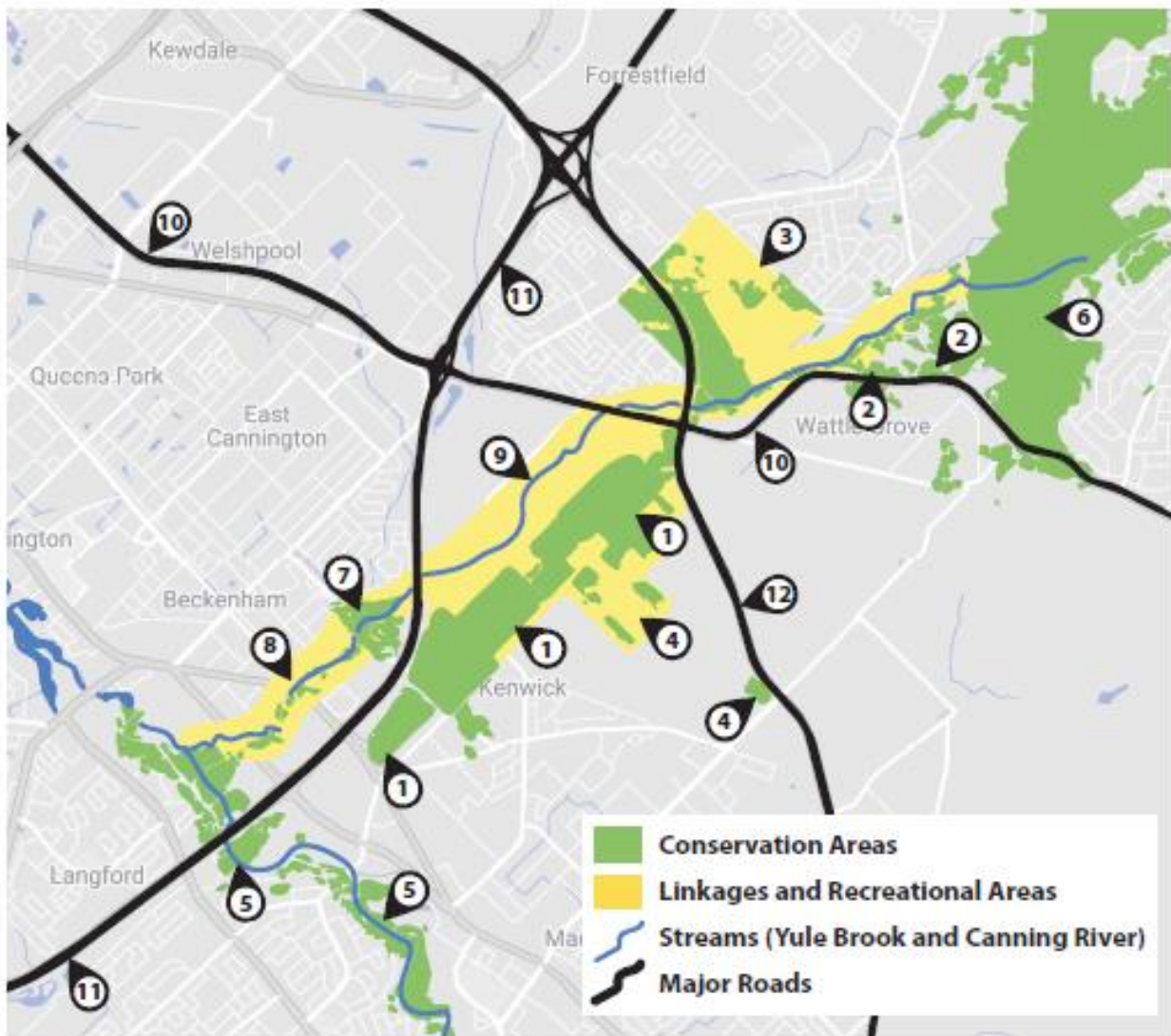
The Western Australian Environmental Protection Authority (EPA) proposed the conservation of this area long ago in its 1981/1983 System Six Study (recommendation M69), but at that time it did not appreciate the unique value of the Greater Brixton Street Wetlands, as it focused its attention on the Kenwick Swamp (Fig. 2) (DCE, 1981; 1983). Subsequent biological research has shown that this area contains more rare species than any other reserve on the entire Swan Coastal Plain, and its value as a wildlife corridor from

the Lesmurdie Falls National Park (Fig. 4) to the Canning River Regional Park has been scientifically established (Tauss *et al.*, 2019).

## THE REGIONAL PARK CONCEPT

The concept of a Regional Park had its origin in the first town planning scheme for the Perth Metropolitan area, the Stephenson-Hepburn Plan (Stephenson & Hepburn, 1955). They foresaw the need to reserve large areas of regional open space to provide for conservation, recreation and landscape protection for the growing city. They were aware of the example of Kings Park, which was created in the 1890s and already served this purpose for the inner suburbs of Perth. They saw the need for further 'Kings Parks' as the City expanded. During the 1960s, the planners created two large, compact areas of Regional Open Space at Bold Park and Whiteman Park.

In the early 1970s, George Seddon published an influential book about the special characteristics of the Swan Coastal Plain, called 'A Sense of Place' (Seddon, 1972). This book made many people aware of the landscape features and biodiversity that give Perth its unique character. These included: the coastal beaches and islands; the river estuaries; the banksia woodlands; the wetland chains; the escarpment; and, the jarrah forest. He advocated the creation of large, manageable reserves of representative remnants of these ecosystems, before they were fragmented by urban development.



**FIGURE 1.** A Concept Plan for the Yule Brook Regional Park.

Key to the numbering

1. Greater Brixton Street Wetlands, Bush Forever Area 387
2. Welshpool Road Bush Forever Area 50.
3. Hartfield Park Bush Forever Area 320
4. TECs in the general area
5. Canning River Regional Park and Beckenham Open Space
6. Lesmurdie National Park
7. Mills Park Recreation Area
8. Yule Brook stream reserve
9. Living stream and flora display park
10. Welshpool Road
11. Roe Highway
12. Tonkin Highway

Source: Map prepared by Tobias Busch based on research by Cate Tauss (2018)

Tauss C 2018 Proposal to establish Yule Brook Regional Park, connecting Lesmurdie Falls and the Canning River, submission to the WA Minister for the Environment.