



Nature Conservation | Margaret River Region

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13 February 2024

Attn: Stephen Schreck
Shire of Augusta Margaret River

P223783 - Proposed Structure Plan for Lot 102 Bussell Highway, Cowaramup.

To be submitted as an online response on behalf of NCMRR by 4pm on 13 February 2024

Thank you for the opportunity to comment on this proposal. Nature Conservation Margaret River Region is a non-profit community-based environmental organisation working on key environmental challenges facing the southwest of Western Australia. Nature Conservation has more than 2000 local supporters (including members, donors, active volunteers and project partners/participants). We advocate for best practice environmental land use and management in caring for the natural environment in our region.

We do not support the proposed structure plan on the grounds that it fails to retain potential nesting habitat for three endangered black cockatoo species (*Calyptorhynchus baudinii*, *Calyptorhynchus latirostris* and *Calyptorhynchus banksii naso*) and removes habitat and foraging trees likely to be used by threatened species Western Ringtail Possum (*Pseudocheirus occidentalis*) (WRP). The plan also makes insufficient provision for natural areas to be protected and restored, in keeping with the natural values of the surrounding area and the requirements of the AMR Local Planning Strategy (2022).

Our reasons are set out in more detail below, together with our comments on best practice, practical solutions.

Conservation of threatened species

The proposed structure plan is based in part on the assumption that there are unlikely to be significant impacts on any threatened or endangered species. This assumption is evidenced by a report prepared by Ecosystem Solutions, which states that the site contains evidence of WRP habitat (dreys) and foraging (scat), as well as 141 potential nesting trees for three black cockatoo species and signs of cockatoo foraging (seed damage).

In the circumstances we strongly recommend that:

- the structure plan should provide for all remnant trees to be retained, in particular the 141 potential nesting trees (including dead trees).
- the proponent should be required to rehabilitate the areas of degraded vegetation, including removal of weedy species and introduction of native understory elements.

- the potential for creating connectivity between the vegetation on site and other areas surrounding the site should be required to be considered further, in order to support biodiversity by reversing the pattern of landscape fragmentation often created by conversion to residential land use.

In addition, we are concerned that any threatened flora will not have been apparent when surveys are carried out in Autumn rather than Spring, or other relevant seasons for endemic flora species known to occur in the area. The survey used to support the proposal does not conform to valid scientific survey methods, which makes the report unreliable in its assumption that there are no impacts on threatened flora. We recommend that valid flora surveys are undertaken before reaching this conclusion.

Protect and enhance native vegetation

We strongly recommend that the proponent is required to make better provision for the long term protection of the native remnant vegetation, by including a requirement to protect and enhance the condition of the existing native vegetation. This will help to ensure that the remnant vegetation is properly protected for the future, and not allowed to become further degraded.

It will also support inclusion of additional areas of native revegetation to be included in the structure plan, in order to reverse pre-existing degradation and fragmentation, helping to support biodiversity conservation in the region. We strongly recommend that some of the POS be revegetated to appropriate standards, to provide increased habitat, ecological linkages and amenity. This would simply require that provision be made in the structure plan for vegetation corridors to connect key areas of vegetation across the development site. This will assist endemic threatened fauna and flora species in the area.

Land use balance

Decisions made around this proposed structure plan present an opportunity for the Shire to shift development in Cowaramup towards a more nature positive outcome, in keeping with the local identity, surrounding area and overall natural values of the southwest region.

With this in mind, we strongly recommend that the POS allowance should reflect the present balance of POS / residential use in Cowaramup town. This will avoid the risk of an inappropriately overbuilt urban area and will help to ensure that the new development remains in keeping with the present township environment as well as building resilience for climate change impacts.

Accordingly, we recommend that the POS requirement for the structure plan should be set at 20% - 30%. This recommendation is also in alignment with the Shire's planning objective of setting 'an aspirational target of 20 per cent canopy to be achieved in new growth areas over the life of the strategy' (AMR Local Planning Strategy 2022, p35).

In our view, a greater POS allowance will provide a better land use balance with a greater allowance for natural spaces and will contribute to a cohesive sense of place for this area of land as well as conservation goals.

Buffer zones

A buffer zone or setback should be put in place to provide a minimum 20m buffer between remnant vegetation and any built structures, including roads.

The buffer zone should be rehabilitated as needed using appropriate local native plants. Controls during the construction phase should be put in place to avoid or minimise dust, noise and unnecessary disturbance to native vegetation areas. These buffer zone recommendations will provide for better ecological function and will help to provide resilience for the native vegetation into the future, especially in view of likely climate change impacts.

We particularly wish to draw attention to the need for a buffer zone separating residential land from the western boundary of the site, where it adjoins the Wadandi Track. The current proposal has Residential R12.5 density land backing onto high quality remnant vegetation and known WRP habitat. Without an appropriate buffer zone, this will inevitably lead to conflicts in relation to fire risk, weed incursion, edge effects and threats from domestic pets.

We also recommend that the developer is required to take full responsibility for management of the remnant native vegetation and other POS areas, with a particular emphasis on ongoing weed controls, until the land is ceded to the Crown.

Retain all pre-existing mature trees

The proposed structure plan anticipates that many of the pre-existing trees may be removed. We recommend imposing a condition ensuring that all pre-existing established trees are retained. This is also in keeping with the Shire's goal of 'minimising the urban heat island effect by maintaining and increasing tree canopy cover in urban areas' (AMR Local Planning Strategy 2022, p34).

Ideally these mature trees would be retained within POS, however, where the trees will be retained within lots, we recommend that it is made a condition of sale that the trees are retained.

Reduce lot yield

We note that the AMR Local Planning Strategy (2022) refers to this area as having an estimate lot yield of 124 lots (at page 97). However, this structure plan anticipates 184 lots.

In our view, this increase is extremely undesirable from a conservation perspective. If the lot yield was reduced to a limit of the anticipated yield, additional land area would be available for POS and to achieve all of the biodiversity conservation and other recommendations outlined above.

For this reason we strongly recommend that the proponent is required to limit the lot yield to that set out in the AMR Local Planning Strategy (2022).

Sustainable water resources

We wish to express concern about the future water resources for supplying this proposed development. With such an extensive development significantly increasing the local population, and facing a drying climate, we strongly recommend taking steps to ensure sustainable future water usage, including options such as including third pipe infrastructure to allow garden watering to use recycled water.

Assistance

We would be very pleased to discuss the above matters with the Council and/or developer, as our preference is to take a collaborative and proactive approach wherever possible. If you would like to discuss this with us, please contact Drew McKenzie to arrange a meeting.

Yours Sincerely,



Drew McKenzie
General Manager
Nature Conservation Margaret River Region