



# Save Perth Hills

## SUBMISSION INFORMATION FOR AMENDED STRUCTURE PLAN SP34 - NORTH STONEVILLE

### Short Version

This information is designed to help you select topics and information that are relevant to you for your submission, (letter), to WA's Department of Planning. We urge you to use our words as a 'guide', and where possible, use your own words - and experiences (eg bushfire), as you write your submission. Include one, or as many points as you like, and speak from your heart!

This **Short Version** outlines the basic issues but doesn't have the depth and detail of the **Detailed Version**. You might find it easier to use if you are short on time or perhaps you have teenagers looking to understand the issues and complete a submission.

***Key issues are:***

1. **Bushfire Dangers and Impacts (Including the non-existent East Link)**
2. **Environmental Loss and Impacts**
3. **Local Traffic Impacts**
4. **Stranded Community - Misalignment to State Planning Strategies**
5. **Waste Water Treatment Plant Impacts**
6. **Tourism Impacts**
7. **Amenity**

If you would like to read the amended plans yourself you can find them here

<https://consultation.dplh.wa.gov.au/land-use-planning/amended-north-stoneville-structure-plan-34/>

The local community, Mundaring Shire Council, WAPC and DFES all rejected the original plan because it was dangerous to our community, destructive to our environment and contravened 4 State Planning Policies. SPH believes this 'amended' plan should also be rejected - because it remains dangerous and destructive, and non-compliant with the same State Policies, especially SPP 3.7 (Bushfire).

**To send in your submission (letter) please follow the link below.**

<https://consultation.dplh.wa.gov.au/land-use-planning/amended-north-stoneville-structure-plan-34/consultation/>

**Or Mail to: Dept of Planning, Planning Appeals - Locked Bag 2506, Perth WA 6001**

**It's important to start your submission letter with: "I'm totally opposed to the amended plan for North Stoneville. Reference number DR 189/2020"**

**Deadline for submissions is Monday 8<sup>th</sup> May**

We recommend writing your submission as a Word document so you have a copy. This can be submitted on the Dept of Planning portal as an attachment, and allows you to easily send a copy (CC) of your submission to Save Perth Hills and politicians including the Premier, Mark McGowan. If you have any problems please contact us by email [saveperthhillsinc@gmail.com](mailto:saveperthhillsinc@gmail.com) and we can organise someone to help.

**Please send a copy to:**

- [saveperthhillsinc@gmail.com](mailto:saveperthhillsinc@gmail.com)

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## **1. Bushfire Dangers and Impacts**

- a. The North Stoneville region is highly bushfire prone, having experienced four catastrophic bushfires in 2003, 2008, 2014 and 2021. The Wooroloo Bushfire (2021) was Perth Hills' worst-ever bushfire, burning within 5-kms of North Stoneville. These bushfires destroyed a total of 150 homes, impacting more than 600 people.
- b. This amended proposal will more than double Stoneville's local population of 2,489, significantly increasing the bushfire evacuation risk.
- c. Satterley's bushfire evacuation plan FAILS to respond to ANY of the realities of evacuation during a bushfire emergency. The evacuation plan depends ENTIRELY on the non-existent, un-committed and unfunded 'East Link', and excludes traffic impacts from 2,360 MORE residents from the planned North Parkerville townsite across the road.
- d. Satterley's Bushfire Simulations omit the most dangerous and prevalent bushfire wind directions and highest fire danger from the west and from the east. The 2014 Stoneville-Parkerville-Mt Helena Bushfire started on a westerly wind with 57 homes destroyed. The 2021 Wooroloo Bushfire started with howling easterlies and destroyed 87 homes.
- e. Ember attacks can result in spot fires 3.5 kms or more ahead of the main bushfire front. In the Satterley bushfire simulation modelling spotting of only 500 m was used.
- f. There is no evacuation simulation for either all, or parts, of Stoneville and / or Roland Roads being closed, deviated, detoured, congested, gridlocked, or inaccessible. During a bushfire disaster with low visibility, burning rural roadsides, evacuation with livestock, horse floats, panicked residents, emergency vehicles, fallen branches / power lines blocking roads, the potential for deadly traffic gridlock in this tight rural-road network setting is very real.
- g. WA's Water Corporation stated *December 22, 2022*: "***Mains water supply cannot be guaranteed during a bushfire***".
- h. **Climate Change** is increasing bushfire risks: decreasing rainfall in Perth, increasing temperatures, more frequent Extreme and Catastrophic Fire rated days.
- i. High costs of building to Bushfire Alert Level (BAL) levels and increasing insurance costs in bushfire risk zones are not included. Recent bushfire and flood disasters in Eastern Australia have rendered some regions un-rebuildable and uninsurable.

## **2. Environment Loss and Impacts**

- a. This potentially disastrous threat to habitat must be promptly referred by the WAPC to the EPA (Environmental Protection Authority) for an Environmental Impact Assessment. The EPA has never assessed this site under WA's State Climate Change Policy or WA's new Biodiversity Act and the Agency has a 'duty of care' to consider the site with regard to new scientific evidence.
- b. At 534.6 hectares, the site is 136-hectares bigger than Kings Park, the area is part of an International Biodiversity Hotspot supporting highly sensitive and complex ecosystems that are known to be under threat.
- c. All three threatened and endangered Black Cockatoos have been observed, nesting, foraging, and roosting on the site, ongoing habitat loss through the destruction of native vegetation has been identified as a key threat.
  - Baudin's Black Cockatoo is about to be listed as critically endangered. The Black cockatoos will be extinct in 20 years if land clearing of Cockatoo habitat continues at the current rate.
  - The three Cockatoos are listed as Matters of National Environmental Significance and protected under the National Environment - 'EPBC' Act. Satterley's original North Stoneville plan never got approval under the EPBC Act despite 5 years of effort.
  - The proposal would see the disturbance or destruction of almost 300 hectares of Moderate to Excellent Quality Black Cockatoo foraging, roosting and nesting habitat.
  - A site survey identified 27 potential nesting trees (which take 200 years+ to develop suitable nesting hollows). At least 15 of those 27 trees will be destroyed.
  - Planned 'offsets' (buying land elsewhere to compensate for the losses at North Stoneville and offering money for 'Black Cockatoo research' – are not acceptable.
- d. The site provides habitat for Chuditch (*Dasyurus geoffroii* – Vulnerable) and Brush Tailed Phascogale (*Phascogale tapoatafa* – conservation dependent.) Habitat destruction and the introduction of cats and dogs will have a disastrous impact on these species.
- e. Much of the site outside of the conservation area would become a "managed landscape" to reduce BAL ratings for housing, which would result in even more habitat destruction. The developer admits that "clearing practices may also result in accidental clearing of vegetation and trees proposed for retention" resulting in extended clearing of natural vegetation.
- f. At least 50,000 mature Jarrah and Marri forested trees will be bulldozed if this development is approved. The ecological devastation caused by this is incomprehensible. Over the next 27 years, (to 2050) these trees will remove 35,640 tonnes of CO<sub>2</sub> - a major contribution to the WA Govt's legislated commitment for net zero emissions by 2050.
- g. Climate Change impacts or actions, aligned to meet the State Government's formal Climate Change Policy, have not properly been factored into the proposed development. Land clearing will result in mass habitat loss and release of carbon from the clearing of at least 160 hectares.

## **3. Local Traffic Impacts**

- a. The un-committed, unfunded, non-existent East Link highway is an integral part of Satterley's proposed traffic solution for the area post 2023.

- b. At least 8000 extra traffic movements on the rural Stoneville Rd- every day. This does NOT include the North Parkerville proposed population of 2360. Our local road network is rural-style, single lanes, with gravel sidings and no capacity for road widening: creating critical safety issues and traffic gridlock potential into Mundaring.
- c. The developer admits - no public transport for at least 11 years. (if ever). 2800+ residents would be stranded, 8 kms from Mundaring's centre, and solely reliant on private vehicle use.
- d. Seaborne, Brooking, Stoneville and Roland Roads are single rural lanes, and designed to carry limited local traffic only.
- e. 5 schools (Mundaring Primary, Mundaring Christian Primary, Parkerville Primary, Steiner, (upgrading to high school), Mundaring Christian Secondary) use these roads for drop off and pick up twice a day, along with bus stops for Eastern Hills High School and several others attended by Hills students. The surrounding rural road network will not cope with an additional 2800+ residents, 1200 cars, 1500 school children, teachers, and hundreds of staff (plus their cars), from two more projected schools on site. Thousands will be at great risk.
- f. All internal exit roads lead onto the only two rural exit roads of Stoneville and Roland roads.

## **4. Stranded Community**

- a. Satterley is presenting a 15 year staged plan, such a long term projection of start to finish for a stranded housing estate is contrary to 'orderly and proper planning', as it creates financial and planning uncertainty for the Shire, proposed estate residents, ratepayers, and for the State and its taxpayers.
- b. No public transport planned. The plan contravenes the WA Govt's strategic planning priorities, for '*well-located infill urban residential development that leverages investment in METRONET Infrastructure.*' For North Stoneville - the closest METRONET is 20 kms away.
- c. A 15 year staged plan potentially leaves 400 houses (at least 1,120 people) in limbo for provision of services such as childcare centres, schools, shopping centres, services or road upgrades until the entire townsite is completed 7 years (or more) later.
- d. Limited water and low water pressure mean North Stoneville households will be allocated 20,000kl less water than their suburban counterparts 'down the hill' despite being located in the middle of a proven catastrophic bushfire region.
- e. A stranded community such as this will rely on private vehicles, resulting in an increase in greenhouse gas emissions at a time when the State Government is actively establishing a framework for responsible emissions reductions to meet WA's goal of net zero by 2025.

## **5. Waste Water Treatment Plant Impacts**

- a. The management of sewage and wastewater is reliant on a system not suitable to the local environment, providing high operational and maintenance costs to be run by a private company, which, when it fails, will be handed over to Watercorp (WA taxpayers) which has already distanced itself from the proposal given the numerous geological, financial and operational issues.
- b. The Mundaring plant, which uses the same technology, is inadequate, has frequent breakdowns and failures, complaints of smell, noise, and is a mosquito breeding site.
- c. Risks of leaching or contaminating ground-water aquifers or dams relied on by many local residents as their only water source. This is particularly important for the Suzannah and Jane Brooks which have significant Aboriginal heritage value. Holding dams historically rupture and leak and can contaminate pristine aquifers on this site.
- d. Ongoing operational and maintenance costs risk being passed onto Mundaring shire ratepayers with no benefit to anyone outside of this private housing estate.

## **6. Tourism Impacts**

- a. Urbanisation of Perth Hills is contrary to Perth Hills position as a recreation, retreat and wilderness area for Perth. Visitors enjoy the hills for the natural environment, wildlife, hiking, Mountain Biking, our historic village pubs and to 'get away from it all'.
- b. The Perth Hills are a major feature of WA's Southwest biodiverse and internationally recognised environment - one of the world's few remaining Biodiversity Hotspots with outstanding natural environments, critically endangered native wildlife, and whose protection is considered essential at Federal Government and international UN level.
- c. Potential to preserve and continue to develop the Hills as a natural retreat and tourist haven, for recreation, education and connection to the natural environment.
- d. At 534.6 hectares, it represents a massive area that, as an urban housing estate, would be out of scale and scope with the surrounding rural landscape and Hills culture and environment.
- e. Tourists won't come to see urban sprawl. We should model Perth Hills on the visionary Adelaide Hills which enjoy their own 'protection' (much like WA's coastal regions - protected by SPP 2.6).

## **7. Impact to Amenity**

- a. Amenity is important, not only to residents and future generations, but also to visitors to the hills, especially in an area heavily reliant on local, interstate and international tourism. The community has rejected any form of urban development in the area for over 32 years expressly showing the desire of the community for the area to remain rural in character.
- b. The surrounding land is primarily beautiful natural Jarrah and Marri forest country with mostly two-hectare rural properties containing residences, outbuildings, water tanks, dams and paddocks for livestock. This is the essence of the hills character and lifestyle.

- c. The character and amenity of the area would dramatically change with an urban development of approximately 1001 houses in North Stoneville followed by up to 750 dwellings (2,360 more people) in the North Parkerville townsite.
- d. Almost all of the residents surrounding, or living nearby, this proposed townsite invested, financially and holistically, in the belief that the area would remain semi-rural (5 acres and above). An urban townsite does NOT align to the semi-rural lifestyle which people bought into here.
- e. An important and unique aspect of the hills is its flora and fauna. All three rare and endangered Black Cockatoos found in Western Australia have been observed, nesting, foraging, and roosting on the site. 160 hectares of the Cockatoo habitat, 50,000+ trees will be bulldozed to make way for the proposed North Stoneville development.
- f. There would be substantial increase in local traffic - 8,000 extra traffic movements everyday, on rural roads surrounding North Stoneville. This would impact road safety, (single lane gravel siding-roads, no footpaths), air quality and noise.
- g. Only minor local employment would be provided by the proposed development - the majority of people would have to travel by car 15-35 kms to work.
- h. Both increased traffic and land clearing would increase greenhouse gas emissions at a time when the State Government is aiming to reduce emissions by 80 per cent by 2030.
- i. According to the developer, the proposed townsite would be without services such as medical facilities, shops and schools until at least 2038.
- j. The recent IPCC report confirms the urgency of acting on Climate Change – it is crucial that we preserve the forest that we have - not destroy it. The Minister for Environment and Climate Action, the Hon, Reece Whitby will '**release the State Govt's Climate Action Adaptation Strategy mid-2023**'. It's essential that the WAPC take this into consideration as good governance.
- k.

**Conclude with why Perth's entire community NEEDS the Perth Hills. Just as the coast provides a necessary and natural retreat, so too, do Perth's Hills. The Hills environment provides scientifically proven mental health benefits, offering space and peace from the rigours and pressures of everyday life. They also allow us all to learn and appreciate a biodiverse environment, unique to Perth Hills:**