



# Save Perth Hills

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

Our 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, as you write your submission. Include one, or as many points as you like, and speak from your heart!

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"**

**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) Aboriginal Heritage Loss and Impacts**
- 6) Waste Water Treatment Plant Impacts**
- 7) Tourism Impacts**

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:

- **SPP 3.7 Planning in Bushfire Prone Areas**
- **SPP 3.4 Natural Hazards & Disasters**
- **SPP 2.8 Bushland Policy for Perth Metropolitan Region**
- **SPP 2.0 Environment & Natural Resources**

SPH believes this 'amended' plan should also be rejected - because it remains dangerous and destructive, and **non-compliant** with these State Policies, especially SPP 3.7 (Bushfire). Incredibly, Satterley's evacuation plan depends entirely on the non-existent, unfunded, uncommitted Federal and State highway (East Link) to evacuate North Stoneville.

**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**

**Please include reference number DR 189/2020, and ensure you lodge your submissions by Monday 8th 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:

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## **1. Bushfire Dangers and Impacts (Including the non-existent East Link)**

**\*If nothing else - please use the first three paragraphs, preferably in your own words, But please begin with: "I am totally opposed to this amended plan for North Stoneville - reference number DR 189/2020..."**

The proposed North Stoneville development is in a severe, proven, and increasingly dangerous bushfire prone area. The risk of Catastrophic Bushfires here are real, they've been experienced, and they're increasing. The amended North Stoneville plan, with more than 2,800 residents, will dangerously intensify risks identified in *State Planning Policy (SPP) 3.7 Planning in Bushfire Prone Areas* - which places Primacy of Life as the priority, and also *SPP 3.4 Natural Hazards & Disasters* two State Policies that WA Planning Commission (WAPC) applied to reject the original SP34 in 2020. This amended proposal will more than double Stoneville's local population of 2,489 in an era of increasingly unprecedented bushfire disasters and dangers. The WAPC must apply the 'Precautionary Principle' and refuse this amended Structure Plan to safeguard existing residents and to prevent placing thousands more, knowingly, in harm's way.

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. Many of those people, and hundreds more, remain permanently affected, financially and / or emotionally, by these traumatic bushfire experiences.

### **KEY FAILURES OF SATTERLEY'S BUSHFIRE EVACUATION PLAN AND SIMULATIONS:**

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, uncommitted (Federal and State) and unfunded 'East Link', and excludes traffic impacts from 2,360 MORE residents from the planned North Parkerville townsite across the road, potentially adding up to 1200 more cars on local roads. These key assumptions (East Link) and considerable underestimations of traffic impacts in bushfire conditions, render Satterley's Bushfire Management Plan as totally ineffective to combat or manage the bushfire realities - on a planning platform. They potentially endanger - not protect, human life - and therefore fail to comply with the primary objectives of SPP 3.7 and SPP 3.4.

1. Location is a permanent, proven and increasingly dangerous Extreme Bushfire Zone, with the Shire of Mundaring rated Australia's 5<sup>th</sup> highest-at-risk-of-bushfire Shire. (*CSIRO and Australian Bureau of Meteorology's State of the Climate Report 2018*)
2. This Bushfire Evacuation Plan **relies 100%** on the unplanned, non-existent, un-committed-to, **East Link highway**. The developer holds an unsubstantiated assumption that this Highway will be financially committed to by Federal and State Governments - and their taxpayers, and that it will be completed by '2038'. A non-existent highway that 'might' - or might not - be finished in 2038, or even started at all, cannot be upheld by the WAPC as 'orderly and proper planning' - when lives depend on the outcome - and SPP 3.7's primary objective is the 'primacy of life.'
3. Further, East Link cannot be considered because the State Government has committed to undertaking strategic planning for Westport (Kwinana), as recommended by Infrastructure WA. Westport which has a reliance on rail, not road, as the preferred freight option. No such strategic planning is underway, being recommended or planned for East Link which also requires an 80% Federal funding commitment and Infrastructure Australia approval. The Govt intends Westport to become the State's future freight network - rendering the notion of East Link superfluous and outdated to the State's needs.
4. 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.
5. Ember attacks can result in spot fires 3.5 kms or more ahead of the main bushfire front as was experienced and recorded during the 2021 Wooroloo bushfire. In the Satterley bushfire simulation modelling spotting of only 500 m was used. This severely limits the predicted speed of advance of the bushfires simulated in the modelling and creates the illusion that there is more time to evacuate an area. <https://www.wa.gov.au/system/files/2022-09/Wooroloo-Bushfire-Review-2021.pdf> (page7)
6. Satterley's Bushfire Simulations feature an unrealistic travelling speed (60kph) during a bushfire emergency and **ignore ALL bushfire evacuation impacts** such as tight, winding rural roads with loose-gravel sidings, bushfire smoke, road reserves on fire, burning embers reigning down, panicked drivers, accidents, fallen trees and powerlines blocking roads, slow moving vehicles towing horse floats, trailers and caravans, loose livestock / horses on roads, emergency vehicles accessing / leaving under emergency conditions.
7. Satterley's Bushfire Simulations **are based on a completely unrealistic and dangerous expectation of a 60-kph travelling speed** for rural Stoneville Rd and Roland Rd, (and in the absence of any noted constraints in Point 5), while **'NO EFFECT'** is noted for potential traffic speeds on Great Eastern Highway (GEH) or Toodyay Rd - meaning - zero expectations for road diversions, detours, closures, blockages, slow moving traffic, accidents, traffic congestion, traffic gridlock or bushfire conditions of any description.
8. There is no evacuation simulation for either all, or parts, of **Stoneville and / or Roland Roads - the two main internal rural roads leading to GEH or Toodyay Rd, (or the non-existent East Link)**, being closed, deviated, detoured, congested, gridlocked, or inaccessible because of dangerous bushfire conditions. Only **cars** (travelling 60 kph) are in the evacuation simulations - no trucks, trailers, caravans or vehicles towing horse floats, despite representing a large local traffic proportion in this region.
9. **Major under-estimations of emergency vehicles:** Satterley's Bushfire Management Plan (Traffic Modelling) allows for only **TWO emergency vehicles** to be included for each of their traffic modelling zones (13 zones). In contrast: **500 firefighters and 95 emergency vehicles attended Wooroloo Bushfire in the first three hours**- *AFAC Independent Operation Review*. That bushfire

burnt **11,000 hectares**. On March 21, 2023 - **11 firefighting crews** were required to battle a **6-hectare** blaze in Star Swamp North Beach.

[https://www.perthnow.com.au/news/disaster-and-emergency/north-beach-fire-firefighters-rush-to-star-swamp-as-bushfire-ignites-near-north-beach-primary-school-c-10108606?utm\\_campaign=share-icons&utm\\_source=clipboard&utm\\_medium=clipboard&tid=1679387713371](https://www.perthnow.com.au/news/disaster-and-emergency/north-beach-fire-firefighters-rush-to-star-swamp-as-bushfire-ignites-near-north-beach-primary-school-c-10108606?utm_campaign=share-icons&utm_source=clipboard&utm_medium=clipboard&tid=1679387713371)

10. The evacuation modelling assumes ‘**all residents will evacuate in a timely manner**’ and no one stays to defend their home. Evidence refutes that assumption showing approximately many residents up to 30-40% stay and defend their property. That could mean 1200 North Stoneville people remain on-site during a full-scale bushfire emergency.
11. The scientific evidence shows in reality evacuation often takes place at the last minute as the fire front arrives—forcing people out into the most intense part of the fire. In addition, some people refuse to go, others are simply missed by the evacuation order, while others will attempt to go back into the fire-affected area to save their pets, children and properties.  
<http://royalcommission.vic.gov.au/getdoc/b5de1fe8-8275-450f-b725-b294bf630e07/WIT.3004.003.0232.PDF>
12. Aerial water-bombing is not capable of successfully defending North Stoneville. Aerial water-bombing (including the Boeing 737 FW-LAT) has a **2000 kW m-1 threshold capacity**. An Extreme or Catastrophic level bushfire in North Stoneville will generate above that threshold. For example - the intensity of the 2008 Stoneville Bushfire - which started on the actual site of this planned development - and is **AGAIN omitted and ignored from Satterley's plans**, was measured at **7000 kW m-1**, which is 5000kW m-1 **above** the maximum **2000 kW m-1** aerial firefighting threshold. This bushfire trapped several people in a dam, burned 700 hectares and destroyed four homes.  
<https://www.abc.net.au/news/2008-01-03/blaze-continues-to-burn-in-perth/1002400>. WA has no active night-time aerial water-bombing capability and, like the non-existent East Link, the ‘*potential future prospect*’ of it cannot be considered, given the risks to people’s lives MUST be balanced against fact - not fiction.
13. WA’s Water Corporation stated *December 22, 2022: “Mains water supply cannot be guaranteed during a bushfire”* - placing the corralled 1001 homes of 2800+ people at great risk given water capacity and pressure to this location will be lower than ‘usual’ suburban subdivisions.
14. The region is next door to the bushfire volatile John Forrest National Park and ember attack (from JFNP and generally) can occur from 3 to 6 kms away - not 500-metres stated by Satterley.
15. Mobile phone communication cannot be relied on during bushfires.
16. **Climate Change** is increasing bushfire risks: decreasing rainfall in Perth, increasing temperatures, more frequent Extreme and Catastrophic Fire rated days (Bureau of Meteorology).
17. Omission of a planned adjacent and highly volatile ethanol plant - using flaring at Red Hill, bordering John Forrest National Park, only 3 kms from the North Stoneville site.
18. 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.
19. Two planned schools on-site create a bushfire and evacuation risk for 1500 children, teachers, and staff. Hundreds of parents would race to the area causing traffic gridlock and potentially trapping residents trying to escape on just two external bushfire exits. One exit must always be expected to be compromised by the fire or as an emergency vehicle access road. (DFES)
20. The plan cites dam water connected to the operation of the proposed WWTP as an available source for bushfire fighting. Hills’ Local Volunteer Bushfire Brigade members say using dam water as a backup in a bushfire emergency is THE LAST RESORT - and most often totally disregarded because dam water can contain rocks and other debris that clog fire-truck pumps and pipes and the content

of the water is unknown (causing contamination of the firetruck / pipes, and potentially contamination of private property the water might be used on - even people).

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

**\*If nothing else - please include these first three paragraphs - preferably in your own words - but beginning with - "I am totally opposed to this amended plan for North Stoneville - reference number DR 189/2020..."**

The WA Planning Commission should reject this Structure Plan on Environmental grounds as this plan continues to contravene SPP 2.8 Bushland Policy for Perth Metropolitan Region and SPP 2.0 Environment & Natural Resources. The development of this site would have significant and permanent impact on several threatened and endangered fauna including Chuditch, Phascogale and all three species of Black Cockatoo, listed as Endangered and Critically Endangered. The Black cockatoos will be extinct in 20 years if Perth-Peel land clearing of Cockatoo habitat continues at the current rate. Identified breeding and foraging sites are on this North Stoneville site. Only an estimated 3,500 - 4,500 mature Baudin's Cockatoos remain.

<https://blackcockatoorecovery.com/cockatoos-and-animals/black-cockatoo-threats/#:~:text=Habitat%20loss%20is%20the%20main,out%20of%20spaces%20to%20live.>

It must be rejected because of the severe and devastating impact on identified Endangered Black Cockatoos' habitat on North Stoneville, the critically detrimental impact of fragmenting the environment - (destruction of naturally established environmental networks of local birds and animals), increasing cumulative effects of environmental loss and the substantial impacts of earthmoving, environmental disturbance and infrastructure required to establish an entire townsite of almost 3000 people and a housing estate in an area that's rated 'high to excellent value conservation' by the WA Dept of Environment. This plan is a 15-year staged development, so the impact and disturbance of the wildlife will be ongoing and relentless.

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 impact of this plan is environmentally significant and is at the point of no return. 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 this new scientific evidence.

1. At 534.6 hectares, the site is 136-hectares bigger than Kings Park, and larger in area than New York's Central Park and London's Hyde Park - combined. The area is part of an International Biodiversity Hotspot supporting highly sensitive and complex ecosystems that are known to be under threat.
2. At least 160 hectares, or 53.9% of intact forest 300 hectares at North Stoneville, will be totally cleared. This is the same amount as in the original plan because Satterley's removal of 'Lot 1' (20 hectares) is irrelevant because Lot 1 is not zoned for Urban development.
3. There are almost 300 hectares of Moderate to Excellent Quality (Dept of Environment WA 2020), Black Cockatoo foraging and roosting habitat on the site that will be disturbed or destroyed by Satterley's North Stoneville - in contravention of WA's SPP 2.8 Bushland Policy for Perth Metropolitan Region - and SPP 2.0 Environment & Natural Resources. This should again be rejected based on contravention of SPP 2.8.
4. Much of the site outside of the conservation area will become a "managed landscape" to reduce BAL ratings for housing, which will result in 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.

5. Black Cockatoo Impacts: A detailed environmental EPA assessment must be done.
6. The cumulative impacts of clearing Black Cockatoo habitat for North Stoneville, 160 hectares, then North Parkerville, 100 – 200 hectares, should be taken into account when assessing the level of habitat destruction. If the currently un-funded East Link proceeds, approximately 1000 more hectares of habitat destruction would occur. The Commonwealth of Australia’s new Referral Guidelines for the 3 WA threatened Black Cockatoo Species 2022 states that:
  - a. loss of greater than 1 ha of potential nesting habitat must be referred
  - b. nest trees and potential nest trees must be protected
  - c. assessment must be done by a person qualified in black cockatoo assessment
7. All three threatened and endangered Black Cockatoos have been observed, nesting, foraging, and roosting on the site, and 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.
  - a. Endangered - Carnaby’s Black Cockatoo (*Calyptorhynchus latirostris*)
  - b. Endangered soon to be listed as Critically Endangered - Baudin’s Black Cockatoo (*Calyptorhynchus baudinii*)
  - c. Vulnerable - Forest Red-tailed Black Cockatoo (*Calyptorhynchus banksii naso*)
8. 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. Planned ‘offsets’ (buying land elsewhere to compensate for the losses at North Stoneville and offering money for ‘Black Cockatoo research’,) have proven unacceptable to the EPBC office.
9. Ongoing habitat loss through the destruction of native vegetation has been identified as a key threat contributing to the continued decline of all three Black Cockatoo species to levels that are leading them to be extinct within 20 years.
10. 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.
11. 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.
12. The previous plan was rejected by WAPC under SPP 2.0 Environment & Natural Resources and should again be rejected given no new updates aligned to increasing Climate Change impacts have been considered, along with the State’s new Biodiversity Act. The original environmental reports produced by the developer were superficial and inadequate, not conducted across all seasons, observations regarding nocturnal animals were taken during daylight-only surveys, and flora surveys were not representative of seasonal changes. Updated surveys have not been undertaken for this amended plan despite an increased recognition of Climate Change, a State Govt ministerial Climate Action portfolio has been created since the first Satterley report of 2018, along with heightened awareness around the importance of protecting our native flora and fauna, and an updated WA



Biodiversity Act. The Minister for Environment and Climate Action, the Hon, Reece Whitby will 'release the State Govt's Climate Action Adaptation Strategy mid-2023' - too late for public submissions relating to this issue, but available for WAPC to include in your considerations of this matter.

13. A stranded community such as this will rely on private vehicles (The Public Transport Authority will not commit to a bus route before 2038), 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.
14. 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.
15. CSIRO/BOM State of the Climate Report 2018 and 2022 predict a hotter, drier climate for the South West of WA with longer, more intense fire seasons further placing this fragile habitat at increasing risk.

### **3. Local Traffic Impacts**

**\*If nothing else - please include the first 3 paragraphs - preferably in your own words - but beginning with: "I am totally opposed to this amended plan for North Stoneville - reference number DR 189/2020..."**

**North Stoneville will kick off approval for North Parkerville (WAPC minutes July 14, 2020), which will increase local traffic movements to approximately 10,000 extra traffic movements on the Shire's rural roads every day... predominantly Roland and Stoneville Roads.**

**An extra 2803 people will have to shop at the already pressured Mundaring Village complex, 8 kms from the site, along with 2360 more from future North Parkerville - impacting and increasing risks on rural Stoneville Road - which leads to this shopping complex from the site, impacting surrounding local rural roads and local residential parking and access, and intensifying local road pressures generally.**

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

**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.**

1. At least 8000 extra traffic movements on the rural Stoneville Rd- every day. This does NOT include the North Parkerville proposed population of 2360 - which Satterley saw fit to **include** in their previous plan of 2019 - ('given the potential impact), but has **EXCLUDED** North Parkerville from traffic modelling and impacts in this amended plan. 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, for those projected 8000 extra vehicle movements.
2. 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.

3. Traffic implications from surrounding locations have NOT been taken into account with the North Stoneville plan - The Brethren Place of Worship, (100s of cars/people on Seaborne St), proposed North Parkerville estate (2,360 people), Steiner School's High School extension, Kilburn Road Parkerville (56 homes /210 people), new homes on Stoneville Rd (20), Hills Equestrian - Seaborne St - (100s of people - weekends/horse floats)
4. Seaborne, Brooking, Stoneville and Roland Roads are single rural lanes, and designed to carry limited local traffic only. (a serious accident on June 17 2020 on Roland Rd).
5. 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.
6. All internal exit roads lead onto the only two rural exit roads of Stoneville and Roland roads.
7. After 2038 the evacuation traffic plan is 100% dependent on the proposed East Link - a speculative, unplanned, non-existent, project unfunded by Federal and State governments.

## **4. Stranded Community -**

### **MIS-ALIGNMENT WITH STATE PLANNING STRATEGIES**

**\*If nothing else - please include the first 3 paragraphs - preferably in your own words - but beginning with: "I am totally opposed to this amended plan for North Stoneville - reference number DR 189/2020..."**

Satterley is presenting a 15 year staged plan - a highly unusual (never before) approach by this developer. 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. 400 homes are proposed to be built by 2031, and the remaining 601 not finished until the unfunded, un-committed East Link is finished - which Satterley estimates would be 2038. This is an assumption only - no Federal or State commitment exists for East Link.

The plan fails to support, and in fact contravenes the WA Govt's strategic planning priorities, for '*well-located infill urban residential development that leverages investment in METRONET Infrastructure.*' According to the WA State Government's infill strategy - "*A 'METRONET Station Precinct' is required, or within 1000 m of a nominated METRONET station.*" (For North Stoneville - the closest METRONET is 20 kms away, with ZERO prospect of METRONET ever making its way up Great Eastern Highway or Toodyay Road).

A 15 year staged plan potentially leaves 400 houses (at least 1,120 people) in limbo for commitment to, and 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. The State Govt will not



**commit to schools or other State services on site, (including road upgrades or public transport), until the population on site supports it. 1,120 people does not support it. These residents will be minus essential services for at least 6 years which is unacceptable.**

1. The greatest risk of all is that the 'staged plan' will finish at 2031... and remain incomplete. The WAPC is being asked to approve a plan that will take at least 15 years to complete - with no confirmation that will occur. Risks include developer losing interest, financial changes to the industry and / or the company, bushfires rendering the site unsuitable (unallowable) for further development (as per Eastern States floods), and - critically - that the developer's bushfire solution - East Link - does NOT proceed as the developer assumes.
2. Distance to nearest METRONET Station (Midland) 20 kms away - contravenes current State Govt Planning Strategies.
3. No public transport. The WAPC Transport Impact Assessment Guidelines Vol 2 (2016) says it is desirable that at least 90% of dwellings be within a 500m straight line of a bus route. This is not possible at North Stoneville. Additionally, only 40% of homes (400) will be built on site up to 2031 - confirming NO public transport until the remainder are built - at earliest - 2038.
4. The reduction of lots from 1450 to 1001 is an illusion, as Lot 1, which has been 'removed', can be rezoned at a later date allowing for the 20 hectares to be converted into housing. Also, 2,360 houses across the road (North Parkerville) must be considered as a major population increase, as that development will share critical infrastructure with North Stoneville (WWTP), and will increase the density, and intensify all the constraints and impacts of North Stoneville.
5. 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.
6. No 'walkability' outside this township as per Liveable Neighbourhoods Design Principle, and no public transport, so no connection to major shops and essential services - Mundaring (8kms), Midland (20kms). This lack of walkability contravenes current State Planning Strategies. Footpaths are not possible on the winding, narrow, rural roads of Stoneville or Roland.
7. This remains a dangerous and destructive plan from the past – thought up 32 years ago, and totally inappropriate for a future of Climate Change, increasingly dangerous bushfire catastrophes, no connectivity to ANY transport hubs, 20 kms from major arterial routes, unsupported by services and infrastructure and with limited employment prospects. Urban sprawl and urban development in Perth Hills are inappropriate and increasingly dangerous. This proposal is out of sync with Hills' lifestyle, amenity, environment and bushfire risks.

## **5. Aboriginal Heritage Loss and Impacts**

**Currently under investigation- details will be provided shortly**

## 6. Waste Water Treatment Plant Impacts

**(Will be updated shortly)**

**\*If nothing else - please include the first 2 paragraphs - preferably in your own words - but beginning with: "I am totally opposed to this amended plan for North Stoneville - reference number DR 189/2020..."**

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 constraints.

There will be a continual release of nutrient loads and toxins which have poor removal efficiency in the system, as irrigation is at the top of Susannah Brook and Jane Brook Catchments distributing potential health and environmental impacts to the community while polluting soils, waterways and groundwater. This is an un-sustainable solution, environmentally and financially.

1. This technology is untested in Hills geology
2. Privately owned: if the private owner goes broke, or the WWTP is impacted by bushfire or frequent and prolonged, and common power outages in the area, backups and overflows will occur causing potential contamination of the nearby pristine waterways, and potential health impacts on residents.
3. The plan cites dam water connected to the operation of the WWTP as an available source for bushfire fighting. Hills' Local Volunteer Bushfire Brigade members say using dam water as a backup in a bushfire emergency is THE LAST RESORT - and most often totally disregarded because dam water can contain rocks and other debris that clog fire-truck pumps and pipes and the content of the water is unknown (causing contamination of the firetruck / pipes, and potentially contamination of private property the water might be used on - even people).
4. 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, as cited by Mundaring residents in Craigie Street
5. Potential for pollution, contamination of pristine ground water, sits next to Suzannah Brook Catchment, Water Corp WA refuses to involve itself in the plant because of high financial risk to taxpayers.
6. 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.
7. Ongoing operational and maintenance costs risk being passed onto Mundaring shire ratepayers with no benefit to anyone outside of this private housing estate - or, ultimately State taxpayers if it's passed to Water Corp to operate.

## **7. Tourism Impacts**

**\*If nothing else - please include the first paragraph - preferably in your own words - but beginning with: "I am totally opposed to this amended plan for North Stoneville - reference number DR 189/2020..."**

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'. Extending Perth's urban sprawl with townsites modelled on template suburban designs, is the polar opposite of preserving the natural biodiverse environment for local, national and international tourism and for the untapped economic growth opportunities that arise from that.

1. 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.
2. Already nearly 90% of all eucalyptus woodlands have been cleared throughout southwest WA ([www.wwf.panda.org](http://www.wwf.panda.org)). This plan would see almost 160 more hectares of natural bushland and native habitat, including ancient Jarrah and Marri trees, destroyed.
3. 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.
4. At 534.6 hectares, the site is 136-hectares bigger than Kings Park, and larger in area than New York's Central Park and London's Hyde Park - combined. The area is part of an **International Biodiversity Hotspot** supporting highly sensitive and complex ecosystems that are known to be under threat. 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.
5. 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), and are a highly valued environment and popular local, interstate and international tourist destination and attraction.

## **8. Impact to Amenity**

**\*If nothing else - please include the bolded sections - preferably in your own words - but beginning your submission with: "I am totally opposed to this amended plan for North Stoneville - reference number DR 189/2020..."**

The WAPC in considering this application for development approval, must have due regard to the existing and future amenity of the locality including, the character of the locality. Amenity is all those factors which combine to form the character of an area and include the present and likely future amenity.

**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.

When considering amenity of the location the WAPC must consider the following-

- (i) Character of the locality
- (ii) Social impacts of the development
- (iii) Environmental impacts of the development

### **Character of the Locality**

**The surrounding land is primarily beautiful natural Jarrah and Marri forest country with mostly two-hectare rural properties containing residences, outbuildings, self-sufficient water tanks, (no scheme water), dams and paddocks for livestock. This is the essence of the hills character and lifestyle.**

**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.**

1. Many (almost all) of the residents surrounding, or living nearby, this proposed townsite have bought land that originally belonged to the current landowner (Anglican Diocese). They invested, financially and holistically, **in the belief that the area would remain semi-rural (5 acres and above)**, as the first advertisements for this land attested to in the 1970s and 1980s, and as subsequent land releases here, have honoured. An urban townsite does NOT align to the semi-rural lifestyle which people bought into here. A suburban-style townsite such as North Stoneville, would severely impact their amenity, their chosen rural lifestyle, and ultimately - their property values – because those who wish to experience a rural lifestyle would not move into an area with a suburban townsite ‘down the road – with all the traffic and noise constraints, population impacts, environmental devastation and bushfire risks a townsite of this size and style will bring to this otherwise-semi rural secluded location.
2. The current area is characterised by hobby farms, horse/agistment properties and bush blocks of 1-2 hectare separated by 1 1/2-2 km buffer zones.
3. The area is serviced by a network of rural roads with forested winding lanes and sharp bends in the style of a rural or semi-rural landscape.
4. An important and unique aspect of the hills is its flora and fauna.
5. 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.
6. 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, noise and. The development would require blasting of forested hills to reduce the slope to try to reduce Bushfire Attack Level (BAL) building expenses Noise, dust and vibrations from machinery and blasting, would have a profound effect on the local community and on all wildlife in and around this operational area.

7. The location is at least 20 kms from the nearest METRONET in Midland - requiring travel to the train station by private vehicles. No public transport from North Stoneville), There would be a substantial increase in local traffic (8000 extra traffic movements every day on rural roads around Nth Stoneville), impacting road safety, (gravel sided rural road-single lane, and no footpaths) air quality, and noise.

### **Social Impact of the Development**

***Social impacts are factors which a proposal will have on the community and the surrounding area. With an area as unique as the Perth Hills, amenity must always be considered with visitors and tourists in mind. It's not just the people who live here it's the visitors who come to the Perth Hills to recharge and take refuge from hectic lifestyles.***

1. *Ultimately the decision should be concerned with the community's welfare and the community's interests, not just the interests of the applicant for development approval. Federal Government Mental Health Studies prove the innate value of natural locations such as the ocean - and bush environments.- such as the Perth Hills.*  
\* <https://www.aihw.gov.au/reports/australias-health/natural-environment-and-health> - *This link presents a selection of evidence on the positive influence of the natural environment on human physical and mental health in Australia.*
  - (See [Built environment and health](#) for information on the health impacts of the human-made surroundings.)
2. The character and amenity of the area would dramatically change with an urban development of 1001 houses for almost 3,000 people in North Stoneville followed by 750 dwellings in the proposed North Parkerville townsite for 2,360 more people.
3. Cumulative effects of piecemeal, fragmented development will further stretch Mundaring Shire's capacity to cope with a massive financial risk and burden to ratepayers who would receive zero benefit from this development. The City of Swan almost went broke in having to prop up the stranded Ellenbrook development in the first two decade. It has led to massive a State taxpayer burden (hundreds and hundreds of millions of dollars in infrastructure) to support this stranded development – which is a template plan of the even more-remote, geologically challenging, and stranded North Stoneville.
4. The area has no footpaths along the single lane, gravel-sidings-rural road network nor is any public transport planned for the North Stoneville area.
5. 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.

6. The location is at least 20kms from the nearest METRONET requiring travel to Midland train station by private vehicles. This contravenes the State Government's planning strategy for infill close to public transport hubs – which nominates a distance of '1000m (1km) for a METRONET Station Precinct or a nominated METRONET Station to qualify for the ***State Govt's Infrastructure Development Fund – Stream 2 Unlocking Infill Precincts'***.
7. There would be a substantial increase in local traffic (8000 extra traffic movements every day) as demonstrated by huge lines at school drop off and pickup times. (Stoneville Rd, Roland Rd, Stevens St). Access and parking in Mundaring shopping centre is limited and designed for the current population levels.
8. Both increased traffic and land clearing would increase greenhouse gas emissions at a time when the State Government is actively establishing a framework (2023), to reduce Government emissions by 80 per cent below 2020 levels by 2030, with a net zero goal by 2050.
9. According to the developer, the proposed townsite would be without services such as medical facilities, shops and schools until at least 2038. (Public transport remains questionable even at 2038). The existing facilities in Mundaring support the current population but would be over stretched and highly pressured with the arrival of almost 3000 more people from North Stoneville and then a further 2,360 from North Parkerville. Financial pressure and risks would be applied to the State Government (taxpayers) to provide infrastructure and state services to support this extra population. (as per Ellenbrook). (see note 3)

### **Environmental impacts of the development**

The 534 hectares of the proposed North Stoneville townsite, is 134 hectares bigger than Kings Park, and larger than London's Hyde Park and New York's Central Park combined and is located in a biodiversity hot spot. There are 320 hectares of good to excellent quality native Marri and Jarrah Forest on the site. (Dept of Environment WA). 160 hectares of this high value native forest, 50,000 mature trees and hundreds of 200 +year old grass trees, will be bulldozed for the development. A large section of forested hills will be blasted and rock breakers used to flatten the slope of the hills to achieve a lower Bushfire Attack Level (BAL) to reduce the high cost of building and construction.

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 planned North Stoneville development. There have been 27 potential nesting trees confirmed on the site, over 200 years old, that will be lost. Only 4 have been identified by the developer that would be saved.

The many species of plants, animals and birds have been observed on the site which are listed as Matters of National Environmental Significance and protected under the (EPBC Act). Please refer to the [Environmental Impact section](#) for details.



16. Much of the site outside of the conservation area will become a “managed landscape” to reduce BAL ratings for housing, which will result in more habitat destruction. The developer admits that “clearing practices may also result in accidental clearing of vegetation and trees proposed for retention” resulting in additional clearing of natural vegetation.
17. Ongoing habitat loss through the destruction of native vegetation has been identified as a key threat contributing to the continued decline of all three Black Cockatoo species to levels that will lead them to be extinct within 20 years. A detailed environmental EPA assessment must be conducted.
18. 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 failed to get approval under the EPBC Act despite 5 years of effort. Planned ‘offsets’ (buying land elsewhere to compensate for the losses at North Stoneville and offering money for ‘Black Cockatoo research’) have proven unacceptable to the EPBC office. There are no offsets which would compensate for the net destruction of scarce cockatoo foraging and nesting habitat.
19. Hills residents respect these birds and are involved in tree planting and other programs to regenerate the forests and ensure the survival of the cockatoos. The Shire’s Tree Canopy program has been running for over 20 years. All of this community effort would be obliterated by the proposal. The hills are the ‘lungs’ of Perth and must be protected.
20. 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.

**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:**

- <https://www.aihw.gov.au/reports/australias-health/natural-environment-and-health>  
*This link presents a selection of Federal Govt evidence on the positive influence of the natural environment on human physical and mental health in Australia.*
- Travel up the Hill to enjoy local markets and fairs featuring boutique locally made arts, crafts and locally sourced seasonal foods, and eat at historic locations, over a century old. Visit the Mundaring Weir/ historic settlements / heritage buildings, heritage pubs and trails such as the Bibbulmun Track and KEP Trail.
- Silence – serenity, peace and quiet -refuge from hectic day to day life, fresh air
- Spacious, illuminous night sky - unaffected by thousands of street lights, light/noise pollution
- natural environment sounds and sights: birds, possums – can hear the wind and rain travelling through the trees and towards us, garden bombarded by gum nuts when Endangered Black Cockatoos are feasting in the trees.
- Rural tree-lined roads/lanes: no traffic, safe for cycling, walking, trail rides, horse riding, agistment and Pony Club activities.