



Our ref: APP-0000095/ RFI-0000243

[REDACTED]  
CEO  
City of Gosnells  
PO Box 662  
Gosnells WA 6990

Attention: [REDACTED]

Dear [REDACTED]

**Garden Street Extension Southern River – Assessment No. 2357 – Additional Information Document —Summary of Submissions**

Please find enclosed matters raised by Environmental Protection Authority (EPA) Services regarding the City of Gosnells Additional Information Document (Attachment 1) for the above proposal. EPA Services has also summarised the main issues that were raised in the submissions (Attachment 2). A copy of the public submissions is provided in Attachment 3.

You are required to address these issues and provide a response to the EPA Services. The EPA, in seeking your response, does not necessarily endorse the issues raised but asks you to respond to them as you see fit or to modify your proposal, or its environmental management, accordingly.

EPA Services considers that the key issues for the proposal include:

- in the absence of site specific ecological data, the adequacy and appropriateness of the proposed offset sites
- no provision of an Offset Management Plan
- the extensive nature of the proposed revegetation and rehabilitation within the offset sites and achieving the proposed competition criteria within an unspecified timeframe
- the current zoning of offset sites under the Metropolitan Region Scheme and the City Town Planning Scheme.

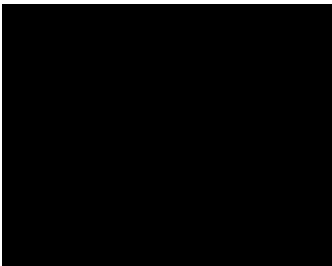
Please note that the Response to Submissions (RtS) document should only include the completed tables provided in Attachments 1 and 2 and any additional or

amended documents such as management plans, as appendices, together with a brief covering summary of the proposal, key issues and number of submissions.

Under the *Environmental Protection Act 1986*, the EPA's assessment report is subject to a 21-day appeal period. During this period the public may appeal the content of, or any recommendation in this assessment report. An incomplete answer to any of the issues raised could cause the public to appeal and this would delay the issue of any Ministerial statement allowing implementation of the proposal by the Minister for Environment. Accordingly, please ensure that you give a full and reasoned answer to each issue.

Should you require further information please contact [REDACTED] on phone number [REDACTED] in the first instance. Please advise by 22 March 2024 when you will submit the Response to Submissions document, or to discuss any matters. Please quote the above 'APP-0000095' on any further correspondence.

Yours sincerely



Executive Director  
EPA Services

6 March 2024

Encl: Attachment 1: EPA Services comments on the proposal  
Attachment 2: Summary of Submissions  
Attachment 3: A copy of the public submissions (names redacted)

# **Garden Street Extension Southern River**

**Additional Information Document  
Assessment No. 2357 (APP-0000095/ RFI-0000243)**

## **COMMENTS FROM EPA SERVICES**

This document provides the comments from EPA Services regarding the Additional Information for the Garden Street Extension Southern River proposed by City of Gosnells.

EPA Services comment	Proponent response
<b>Inland Waters</b>	
<p><u>Hydrological regime</u></p> <p>Provide further clarification on the hydrological regime of the wetland. There appears to be conflicting information regarding the hydrological regime/functioning of the wetland. For example:</p> <ul style="list-style-type: none"> <li>• 360 Environmental (2022) discussed that <i>“water balance modelling undertaken by Urbaqua (2022) assumes that the wetland is connected to the underlying groundwater aquifer so that groundwater will contribute to the wetland when the groundwater level is above the surface and surface water will be lost to the groundwater system when the groundwater level is low”</i></li> <li>• 360 Environmental (2023) further notes: <ul style="list-style-type: none"> <li>○ monitoring results <i>“suggest a very low level of connectivity between the surface water and groundwater at the site”</i> and</li> <li>○ the wetland is expected to have extensive seasonal waterlogging and inundation from shallow groundwater, surface water runoff or a combination of the two.</li> </ul> </li> </ul>	
<p><u>Pre-development monitoring</u></p> <p>As per the 'Water Monitoring Guidelines for Better Urban Water Management Strategies and Plans (DoW 2012),' pre-development monitoring should capture at least two full years for ecological, surface water, and groundwater monitoring. In addition to data provided in Cardno 2018, the 'Hydrology Study and Impact Assessment' (Urbaqua 2022) provides pre-development groundwater monitoring from November 2020 to May 2021. The Urbaqua monitoring program is unlikely to have captured peak groundwater levels. In total, less than two full years of groundwater levels have been provided, and limited groundwater quality data provided.</p>	

EPA Services comment	Proponent response
<p>No surface water monitoring data has been provided. Surface water quality sampling should ideally be undertaken quarterly when water is present, and in addition first flush and event based samples should be captured.</p> <p>Insufficient pre development monitoring has been undertaken, and consequently insufficient data has been used to set baseline conditions for trigger values. Further monitoring results or justification for the period of monitoring and the use of results to set baseline conditions is requested (if available).</p>	
<p><u>Water balance</u></p> <ul style="list-style-type: none"> <li>• The water balance (Urbaqua, 2022). should be informed by any additional pre development hydrological data as discussed in the above EPAS comment (pre development monitoring).</li> <li>• Clarify the suitability of the 'Open water body water balance model' (Urbaqua 2022) for a wetland with dense vegetation, as this type of model may not account for the effects of vegetation on water storage, loss, and flow.</li> <li>• Explain why only the 'evaporation' component was included in the model, and not the 'evapotranspiration' component, which may affect the accuracy of the water balance calculations for the wetland (Urbaqua 2022, Appendix D &amp; E)</li> <li>• Clarify how in Urbaqua 2022 the evapotranspiration volume from the road batters was estimated, and how it compares to the evapotranspiration volume from the cleared vegetation within the development footprint. The report should also justify the revegetation strategy for the road batters and its impact on the wetland water balance.</li> </ul>	
<p><u>Stormwater drainage and water quality</u></p> <p>A pit and pipe drainage system, including pipe discharge into the wetland, has been proposed (Urbaqua 2022). Runoff from the high-traffic road can mobilise pollutants such as metals and hydrocarbons. Although Urbaqua 2022 discusses retaining/infiltrating runoff by installing soakage devices, the devices may not be</p>	

EPA Services comment	Proponent response
<p>capable of treating polluted runoff before retention/infiltration on-site or allowing it to flow into the wetland. Further information on how the proposed treatment approaches for stormwater runoff are sufficient for the site conditions (i.e. conservation category wetland) is requested. This may include evidence of previous success in the application of the treatment approach (including the GPTs proposed) in meeting environmental outcomes.</p>	
<p><u>Post development monitoring</u></p> <p>The Urbaqua (2022) and RPDMMMP (360 Environmental 2023b) report indicates that annual water quality monitoring of runoff from the road will be undertaken for 2 years post construction. This timeframe may not be adequate to identify water quality impacts resulting from the operation of the road. In the absence of significant (i.e. 10+ years) water quality monitoring, water quality impacts both within and adjacent to the development envelope and the effectiveness of proposed hydrological mitigation measures may not be able to be assessed.</p> <p>The post development monitoring program is also of insufficient frequency to allow required contingencies and adaptive management measures to be applied. Consideration of more frequent monitoring is required, including monthly groundwater levels, quarterly groundwater quality and surface water quality, and first flush and event based surface water samples. The sample suite should be expanded to include hydrocarbons and metals.</p>	
<p><u>Construction impacts</u></p> <p>Section 6.5.6 of the RSD (360 Environmental 2023) states that “<i>The construction of the road extension will include compaction of the soil layers beneath the road. This has the potential to make a barrier to the groundwater flow and impact the groundwater flows and levels. The compaction is overall not expected to significantly influence groundwater levels and/or flow</i>”. Further information is requested to justify the determination that compaction will not significantly impact groundwater levels and flow.</p>	

EPA Services comment	Proponent response
<p><u>Construction Environmental Management Plan (CEMP)</u></p> <p>The CEMP notes that there may be indirect impacts from Potential contamination of surface and/or groundwater due to accidental fuel/chemical spills and contaminated stormwater runoff.</p> <p>The City is to confirm whether there will be any fuel/chemical storage or refuelling of machinery within the development envelope. If so provide further information on storage capacity and type of product and management action.</p>	
<b>Offsets</b>	
<p><u>Ecological Surveys</u></p> <p>It is discussed that a Spring 2023 Flora and vegetation survey and targeted black cockatoo assessment for Webster Park (Offset Site 1), Bullfinch Street (Offset Site 2) and Road Reserve (Offset Site 4) was to be completed.</p> <p>The City is to:</p> <ul style="list-style-type: none"> <li>• Provide a copy of the reports which are to be completed early 2024.</li> <li>• Provide information or estimate the area/quantity and quality of the environmental values recorded at the offset site.</li> </ul>	
<p><u>Current zoning of offset sites</u></p> <p>Webster Park (Offset Site 1) is currently zoned Urban (MRS) and Business Development (TPS6). Bullfinch Street (Offset Site 2) is zoned Urban (MRS) and Residential (TPS6). Orange Grove (Offset Site 3) is zoned Rural under MRS and TPS6.</p> <p>The planning objectives for these zones are:</p>	

EPA Services comment	Proponent response
<ul style="list-style-type: none"> <li>• Business Development zone: <i>“To provide for the progressive and planned development of areas for commercial and industrial uses generally in accordance with a Structure Plan”<sup>1</sup>.</i></li> <li>• Residential: <i>“To provide for residential development at a range of densities with a variety of housing to meet the needs of different household types through the application of the Residential Design Codes”</i></li> <li>• Rural: <i>“To provide for a range of rural pursuits which are compatible with the capability of the land and retain the rural character and amenity of the locality”.</i></li> </ul> <p>The City is to confirm whether there are any mechanisms (i.e. rezoning, conservation reservation, conservation covenants) to be enforced to ensure the long-term retention and protection of the proposed offset sites.</p>	
<p><u>Rehabilitation and revegetation</u></p> <p>It is discussed that there is commitment for ongoing management and enhancement of the offset sites (including as required weed control, rubbish control, revegetation and infill planting).</p> <p>While it is noted that the City has proposed to provide a Offset Management Plan at a later date, it is advised that the City provides (at a minimum) a Offset Management Plan framework. It is recommended that the City:</p> <ul style="list-style-type: none"> <li>• provide further clarification on rehabilitation, revegetation areas including objectives, targets and completion criteria proposed for offset sites 1, 2 and 4 (if available).</li> <li>• clarify the proposed rehabilitation/revegetation areas as Table 8 indicates: <ul style="list-style-type: none"> <li>○ Banksia Woodland 2.17ha, CCW 1.07ha/0.22ha REW and Carnaby foraging habitat 3.77ha. However, it is further stated that <i>“All areas forming part of the offset sites shown on Figures 4a and 4c will be protected, enhanced, and <b>rehabilitated</b> i.e. in excess to the areas</i></li> </ul> </li> </ul>	

<sup>1</sup> City of Gosnells Town Planning Scheme No. 6



EPA Services comment	Proponent response
<p><i>defining specific environmental values in this table</i>". Figure 4a includes Offset site 3 (3.96ha) and Figure 4c includes Offset site 1 (1.17ha) and Offset site 4 (0.81ha) and does not include Offset Site 2 (1.24 ha).</p> <ul style="list-style-type: none"> <li>○ Further to the above, Section 5 states that <i>"Revegetation and infill planting within the degraded portions of the offset sites to improve the foraging habitat and Banksia Woodlands of the SCP"</i></li> </ul> <p>It is unclear what rehabilitation/revegetation areas are proposed for each offset site. If available, provide the Offset Management Plan.</p> <ul style="list-style-type: none"> <li>● provide further justification how <i>"the proposed offset sites will be enhanced and protected in perpetuity as the City of Gosnells will remain the land manager, providing long term environmental benefit"</i><sup>2</sup></li> </ul>	

**References:**

- 360 Environmental (2022) Section 38 Environmental Protection Act Referral Supporting Document: Garden Street Extension, Southern River. Prepared for the City of Gosnells.
- 360 Environmental (2023) Section 38 Environmental Protection Act Referral Supporting Document: Garden Street Extension, Southern River. Prepared for the City of Gosnells.
- 360 Environmental (2023b) Garden Street Extension, Southern River Revegetation and Post Development Management and Monitoring Plan. Prepared for City of Gosnells.
- Cardno (2018) Garden Street Extension Groundwater Monitoring.
- Urbaqua (2022). Garden Street Extension, Gosnells Hydrology Study & Impact Assessment. Prepared for the City of Gosnells.

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<sup>2</sup> Appendix P- Offset Strategy (page 3)

# Garden Street Extension Southern River

## Additional Information Document Assessment No. 2357 (APP-0000095/ RFI-0000243)

### Summary of Public and Agency Submissions

This document forms a summary of public submissions and advice received regarding the Additional Information document for the Garden Street Extension Southern River proposed by City of Gosnells.

The public review period for the proposal commenced on 20 December 2023 for a period of 6 weeks, ending on 31 January 2024. A total of 21 submissions were received.

The principle issues raised in the submissions and advice received included environmental and social issues as well as issues focussed on questions of fact and technical aspects of the proposal. Although not all of the issues raised in the submissions are environmental, the proponent is asked to address all issues, comments and questions, as they are relevant to the proposal.

The key issues raised in the submissions include:

- Fragmentation of wetland, flora and vegetation and terrestrial fauna habitat
- Long-term ecological function of the fragmented (isolated) areas
- Potential that not all flora species within the development envelope have been recorded
- Cumulative impacts particularly in the context of proposal location on the Swan Coastal Plain (SCP)
- Adequacy and protection of the offset sites.

## Contents

<b>The proposal – General comments</b> .....	3
<b>Flora and vegetation</b> .....	3
<b>Terrestrial fauna</b> .....	5
<b>Inland waters</b> .....	8
<b>Social surroundings</b> .....	9
<b>Offsets</b> .....	9
<b>Other</b> .....	11

## The proposal – General comments

### Flora and vegetation

No.	Submitter	Submission and/or issue	Response to comment
1	ANON-QTYN-1C8U-D ANON-QTYN-1C84-C ANON-QTYN-1C8E-W ANON-QTYN-1C8T-C ANON-QTYN-1C8S-B ANON-QTYN-1C8J-2 ANON-QTYN-1C8M-5 ANON-QTYN-1C8N-6 ANON-QTYN-1C8X-G ANON-QTYN-1C8D-V ANON-QTYN-1C8Q-9	Clearing of vegetation through the middle of the bushland/wetland will cause fragmentation. On the Swan Coastal Plan (SCP) there are limited consolidated areas remaining. This impact will be permanent with indirect impacts associated with fragmentation and edge effects on the remaining pockets of vegetation.	
2	ANON-QTYN-1C8R-A	The proposal has the potential to result in the loss of two populations of the <i>Drosera patens</i> (Droseraceae). This species was not detected during any of the provided flora and vegetation. The surrounding habitat was extensively surveyed in both 2020 and 2023, with few additional plants were encountered outside of the development envelope The species <i>Drosera patens</i> (Priority 1) carpeting the ground within the Garden Street Extension	

No.	Submitter	Submission and/or issue	Response to comment
		<p>development envelope has been recorded at two locations (&gt;50 individual plants) on 4 October 2020, 15 October 2023 and 9 December 2023.</p> <p>It is recommended that a detailed assessment is undertaken to assess the impacts of the proposal on <i>Drosera patens</i>.</p>	
3	ANON-QTYN-1C8R-A	<p>The proposal has the potential to result in the destruction of critical habitat for <i>Byblis gigantea</i> (Byblidaceae). Typical <i>B. gigantea</i> habitat comprises <i>Pericalymma ellipticum</i> heathland around the margins of winter-wet swamps and depressions, often near the bases of sand-dominated rises and dunes. This precise habitat type is present in the development envelope and the likelihood of <i>B. gigantea</i> occurring there has been assessed as high during the three above-mentioned site visits.</p> <p><i>Byblis gigantea</i> likely grows as a fire-ephemeral species in the SCP (Cross et al. 2013<sup>3</sup>) and populations may thus only comprise a dormant soil seedbank in the prolonged absence of fire. No fire is known to have affected the development envelope for at least 20 years, and this may explain the current absence of growing <i>B. gigantea</i> individuals from this suitable habitat.</p> <p>Minimising the clearing of <i>Pericalymma ellipticum</i> wetlands, even if surveys fail to detect any individuals, has been identified as a key management recommendation in the Threatened nomination for <i>Byblis gigantea</i>.</p>	
4	ANON-QTYN-1C81-9	<p>Not all species present within the development envelope have been recorded in the flora list which does not reflect the true representation of the richness and diversity of vegetation present in the development envelope. For example, Christmas tree (<i>Nuytsia floribunda</i>), Marri (<i>Corymbia calophylla</i>), Jarrah (<i>Eucalyptus marginata</i>), Western Sheoak (<i>Allocasuarina fraseriana</i>), Grey Stinkwood (<i>Jacksonia furcellata</i>); Angled lobelia (<i>Lobelia alata</i>), Holly-leaved banksia (<i>Banksia ilicifolia</i>), Dwarf sheoak (<i>Allocasuarina humilis</i>), ouched Persoonia (<i>Persoonia saccate</i>), Marsh Honey Myrtle (<i>Melaleuca teretifolia</i>), Robin Redbreast Bush (<i>Melaleuca lateritia</i>), Mohan (<i>Melaleuca viminea</i>), Variable-leaved Hakea (<i>Hakea varia</i>), Twisted lily</p>	

<sup>3</sup> Cross, A. T., Merritt, D. J., Turner, S. R., & Dixon, K. W. (2013). Seed germination of the carnivorous plant *Byblis gigantea* (Byblidaceae) is cued by warm stratification and karrikinolide. *Botanical Journal of the Linnean Society*, 173(1), 143-152.

No.	Submitter	Submission and/or issue	Response to comment
		<i>(Arnocrinum preissii)</i> , <i>Calothamnus lateralis</i> , <i>Platysace filiformis</i> , <i>Pultenaea reticulata</i> , Foxtail mulga grass( <i>Neurachne alopecuroidea</i> ) are present and have not been recorded.	
5	Department of Biodiversity Conservations and Attractions (DBCA)	<p>Regarding data for quadrats in potential areas of the Claypans of the Swan Coastal Plain TEC, data analysis. Further information has been provided however, did provide some of the requested statistical analysis results, and it does not address matters raised in previous advice.</p> <p>It was advised that data for quadrats in potential areas of the Claypan TEC should be analysed against the floristic data from Gibson et al. 2005 ('Threatened plant communities of Western Australia. 2. The seasonal clay-based wetland communities of the South West') to determine if the Claypans with mid dense shrublands of <i>Melaleuca lateritia</i> over herbs (a component of the Critically Endangered Claypans of the Swan Coastal Plain EPBC listed TEC) is present. The Gibson et al. (2005) was not used in the analysis and although some results were provided (dendrograms), similarity testing results were not provided as recommended.</p> <p>In addition, the low species richness, which was acknowledged as likely due to below average rainfall prior to the survey, could be influencing the accurate floristic community type (FCT) assessment.</p> <p>This is particularly relevant when assessing claypan communities, which contain large numbers of herbs. To assist in confirming the development envelope's FCTs it is recommended that the quadrats are rescored to reduce the risk that climatic conditions may influence the results and conclusions.</p>	

## Terrestrial fauna

No.	Submitter	Submission and/or issue	Response to comment
6	ANON-QTYN-1C84-C	The clearing of native vegetation (Banksia Woodlands of the SCP, wetland) will have a significant (direct and cumulative) impact and	

No.	Submitter	Submission and/or issue	Response to comment
	ANON-QTYN-1C8U-D ANON-QTYN-1C8X-G ANON-QTYN-1C8C-U ANON-QTYN-1C8S-B ANON-QTYN-1C8J-2 ANON-QTYN-1C8B-T ANON-QTYN-1C87-F ANON-QTYN-1C8M-5 ANON-QTYN-1C81-9 ANON-QTYN-1C8N-6 ANON-QTYN-1C8D-V ANON-QTYN-1C8Q-9 DBCA	<p>fragment quenda habitat particularly critical foraging habitat for the threatened black cockatoo species.</p> <p>The remaining remnant patches are further reduced by the proposal and this impacts the fauna habitat available to a large range of fauna not able to move between bushland patches. The additional information does not recognise the progressive and cumulative impacts to the Bush Forever (BF) area since 2000 (when it was identified as a BF site).</p>	
7	ANON-QTYN-1C8J-2 ANON-QTYN-1C8M-5 ANON-QTYN-1C8Q-9 DBCA	<p>The habitat left after the implementation of the proposal will not be sufficient to maintain the ecological integrity of the remaining bushland and will become isolated to the significant detriment of flora fauna.</p>	
8	ANON-QTYN-1C8B-T ANON-QTYN-1C8N-6 DBCA	<p>Bisecting a known habitat area for conservation significant species with a road will also increase the risk of vehicle collisions with wildlife.</p>	
9	ANON-QTYN-1C8X-G	<p>The development area supports state listed habitat for two threatened bee species i.e. <i>Leioproctus douglasiellus</i>. Threatened bees may be especially vulnerable in that their ecology is not widely understood and,</p>	

No.	Submitter	Submission and/or issue	Response to comment
		therefore, measures to ensure their protection are not well established. The proposal will produce residual and cumulative impacts to habitats that support conservation significant fauna. The uncertain nature of the impacts to some species requires a more detailed investigation	
10	ANON-QTYN-1C81-9	Thread-leaved goodenia <i>Goodenia pulchella</i> is recognised as being important for two species of endangered native bees: <i>Leioproctus douglasiellus</i> and <i>Neopasiphae simplicior</i> and has been observed within the wetland area.	
11	ANON-QTYN-1C81-9	It is likely that these migratory birds utilise this area for breeding. A flock of Rainbow Bee-eaters has been recorded within the development envelope area.	
12	DBCA	<p>Fauna underpasses and culverts have different functions. Only one of the three proposed culverts do not provide a drainage function. For at least part of the year, two of these culverts may be inundated and therefore would not be utilised by a suite of terrestrial fauna.</p> <p>Further discussion on impact and mitigation/management is required. For example, underpasses could include natural features such as logs and rocks to protect and encourage small fauna to use the tunnels. Entrances to tunnels should be vegetated to assist in preventing predation by foxes and cats.</p>	
13	DBCA	Provide further information/clarification on where access control (fencing) along the road corridor will be installed. Fencing is proposed to direct fauna into culverts (when batters are 1:3) (Appendix J) but it is not clear if they will be installed for the entirety of the bushland areas. Lack of appropriate fauna proof fencing on the edges of the carriageways may lead to fauna attempting to cross the road resulting road strikes and causing traffic hazards. The management plans should include a clear provision of adequate access control along road interfaces with bushland areas.	



## Inland waters

No.	Submitter	Submission and/or issue	Response to comment
14	ANON-QTYN-1C8B-T ANON-QTYN-1C8D-V	The modelled average and maximum post-development water levels for the wetland (Hydrology Study and Impact Assessment p23) show significant reductions in the water levels of the wetland area, demonstrating that there will be impacts to the hydrology in and outside the development area.	
15	ANON-QTYN-1C8N-6 ANON-QTYN-1C8Q-9	The wetland within the development envelope area has a management objective of "Conservation". The development envelope falls within the Southern River vegetation complex, only 1.5% of which is secured in conservation areas in the Perth-Peel region and includes the area within Bush Forever Site 125. Given the Bush Forever objective of retaining 10% of each vegetation complex in conservation areas, any further loss of this complex is unacceptable.	
16	ANON-QTYN-1C8B-T ANON-QTYN-1C8N-6	The proposal will also compromise any buffers that protect the existing wetland from pollution runoff. The proposal does not appear to address the Department of Water (DoW) guidance of "vegetated buffers are key strategic elements among a series of protection barrier options that reduce the risk of contaminant impact on water quality" (DoW, 2006) and strategies to protect wetlands and waterways from contamination, DoW identifies "land use activity constraints".	
17	ANON-QTYN-1C8B-T	The groundwater monitoring results in the vicinity of the Proposal are concerning and are suggestive of industrial contamination. They show exceedances of a range of water quality criteria including total nitrogen, total phosphorus, aluminium, chromium and dissolved chromium, lead nickel and zinc and petroleum hydrocarbons. The WA Contaminated Sites Database is suggestive of the area being used as an uncontrolled dump site. Asbestos contamination in the area is also common.	
18	ANON-QTYN-1C8B-T ANON-QTYN-1C8N-6 ANON-QTYN-1C8Q-9	The proposal will fragment an urban wetland system and will likely interrupt the natural hydrology of the area and will be a pollution source to the wetland.	

No.	Submitter	Submission and/or issue	Response to comment
	ANON-QTYN-1C8J-2 ANON-QTYN-1C8N-6		

## Social surroundings

No.	Submitter	Submission and/or issue	Response to comment
19	ANON-QTYN-1C8U-D ANON-QTYN-1C8J-2 ANON-QTYN-1C8N-6	The bushland within the development envelope provides passive recreational opportunities for local residents. These spaces offer a peaceful retreat from the hustle and bustle of urban life, allowing individuals to reconnect with nature and improve their mental well-being. Clearing bushland would deprive the community of these valuable recreational spaces, leading to a loss of quality of life for many Southern River residents.	
20	ANON-QTYN-1C8J-2 ANON-QTYN-1C8N-6	Remnant vegetation within the development envelope provides a cooling effect (reduced urban heat) and is connected to adjoining bushland.	

## Offsets

No.	Submitter	Submission and/or issue	Response to comment
21	ANON-QTYN-1C8X-G ANON-QTYN-1C8D-V	Webster Park (offset site No. 1) and Matison Street (offset site No. 4) offset sites are adjacent to the Southern River liquid waste disposal facility site, which operated from 1955-1981. The groundwater beneath the site is contaminated with petroleum and chlorinated hydrocarbons. Its suitability as a revegetation site may be limited given the groundwater contamination. Due to groundwater contamination this site is not suitable as an offset.	
22	ANON-QTYN-1C8N-6	Webster Park (offset site No. 1). It's stated that " <i>The City intends to counterbalance significant residual impacts</i> " through the conversion of an industrial lot to a conservation Public Open Space (POS) reserve. The impact site (the proposal) consists of a different vegetation community to SCP23a and most of the vegetation is in Excellent condition. It is unclear how this is an action of counterbalance.	

No.	Submitter	Submission and/or issue	Response to comment
		<p>The City's commitment to the "ongoing management of the reserve through weed control, removal of rubbish revegetation and infill planting as required" should not be considered any action of counterbalancing as this offset site is already owned by the City and should have been under the management and protection from surrounding activities to preserve such high-quality vegetation.</p> <p>The vegetation in offset site 1 is not representative of the Banksia Woodlands of the SCP TEC, thus the 'protection' does not 'offset' the proposal's clearing of this TEC.</p>	
23	ANON-QTYN-1C8X-G ANON-QTYN-1C8D-V	Bullfinch Site (Offset site No. 2) Revegetating the buffer area surrounding the wetland area to restore to the Conservation Category Wetland (CCW) (owned by the City) is not considered to be in 'counterbalancing' the destruction and clearing of CCW vegetation in the development envelope.	
24	ANON-QTYN-1C8X-G ANON-QTYN-1C8D-V	Orange Grove (offset site No. 3) borders a landfill site, which operated from 1985-1999. The risks from this site include the release of landfill gases, contamination by metals and PFAS. The site is listed under the DWER Contaminated Sites Database as likely unsuitable for parks and recreation and therefore not suitable as an offset.	
25	ANON-QTYN-1C8X-G ANON-QTYN-1C8D-V	The proposed offsets do not provide the necessary additional habitat for conservation significant species (i.e., they provide no net increase in habitat in the short term), and they are in proximity to sites containing residual industrial contamination, which may have an indirect impact for wildlife or unsuitable for rehabilitation.	
26	ANON-QTYN-1C8P-8	The proposal will contribute to the 'net loss' of critical black cockatoo foraging resources within the City of Gosnells. It is not clear how the proposed offset sites will counterbalance the impact. Ideally, revegetation should happen 5-8 years before clearing for the proposal, to allow for banksia and hakea to begin producing fruit, thereby preventing foraging resource gaps when there is potentially insufficient food available in the area.	
27	DPLH	The proposal will clear vegetation and will also potentially alter hydrological regimes and nutrient run-off into the wetland within Bush Forever Site 125. In	

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		<p>accordance with State Planning Policy (SPP) 2.8, offsets should be considered for the clearing within Bush Forever Site 125.</p> <p>The current offset strategy does not provide a net gain for Bush Forever, rather a loss of 1.2ha. In accordance with SPP 2.8 Appendix 2 (xii) where a proposal cannot avoid negatively impacting a Bush Forever area, the applicant needs to provide documentation showing how they minimised the impact. If any clearing of native vegetation within the Bush Forever area is to occur, then the applicant needs to provide proposed offsets measures (both onsite and offsite), where appropriate and practical, with particular reference to Bush Forever reserves and Government Lands or public infrastructure. The offset package should provide a net environmental gain. It is noted that the City owns land:</p> <ul style="list-style-type: none"> <li>• that could add to Bush Forever which could add to the conservation offset for the site, or</li> <li>• could rehabilitate land within Bush Forever areas in the close vicinity.</li> </ul> <p>Can the City provide further information to the above.</p>	
28	DPLH	<p>The proposed offset sites represent areas of remnant native vegetation in a region that is predominantly cleared for residential development and at risk of future development. Some are zoned Urban or Rural in the MRS and Residential or General Rural under the TPS. The offset sites should be reserved for conservation in the TPS if deemed an appropriate offset. MRS rezoning could be part of an omnibus amendment.</p>	

## Other

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29	ANON-QTYN-1C8U-D ANON-QTYN-1C8N-6	<p>Bushland acts as a natural carbon sink, effectively absorbing carbon dioxide and mitigating the effects of climate change. Preserving bushland aligns with climate change goals and supports the movement towards a more environmentally conscious society.</p>	
30	ANON-QTYN-1C8U-D	<p>Alternatives to Garden Street have not been explored or justified besides easing road congestion. It is crucial to explore alternatives that minimize environmental harm and preserve the unique characteristics of our natural landscapes.</p>	

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	ANON-QTYN-1C8B-T ANON-QTYN-1C8X-G  ANON-QTYN-1C8N-6  ANON-QTYN-1C8D-V	Assessing other potential routes or considering alternative modes of transportation must be used to strike a balance between development and environmental conservation.	
31	DPLH	The current road alignment is in the MRS, and it is noted that the City considers that a realignment would not be possible. In accordance with SPP 2.8, it would be useful for there to be an alternative road alignment to assess the current proposal against.	
32	DPLH	<p>The Final Engineering Plans – Appendix J show the Garden Street typical road cross sections. The cross sections omit the shoulder and shared path which are planned in the adjacent sections. From an Other Regional Roads planning viewpoint and to keep the road footprint to a minimum, it is recommended to include a shared path (2.0m) along one side of the road for the following reasons:</p> <ul style="list-style-type: none"> <li>• Make the road safer for all including vulnerable users</li> <li>• Provide a continuous and direct shared path link north and south of the wetland</li> <li>• Avoid a dog leg shared path route via Holmes Street and Harpenden Street</li> </ul>	
33	ANON-QTYN-1C8X-G ANON-QTYN-1C8D-V	<p>The proposal has been approved under EPBC Decision 2016/7735. Dated 25/10/2018. The condition to have written agreement of the Minister was, however, a requirement at 24/10/2023.</p> <p><i>“If, at any time after five (5) years from the date of this approval, the approval holder has not substantially commenced the action, then the approval holder must not substantially commence the action without the written agreement of the Minister”.</i></p> <p>Can the City provide a status update on the EPBC Decision as the above condition has been exceeded</p>	

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34	ANON-QTYN-1C8X-G ANON-QTYN-1C8U-D ANON-QTYN-1C8J-2 ANON-QTYN-1C8N-6 ANON-QTYN-1C8N-6 ANON-QTYN-1C8Q-9 DBCA	<p>The proposal will add to the cumulative impacts from native vegetation clearing within the east metropolitan region of Perth, which includes:</p> <ul style="list-style-type: none"> <li>• loss of the cooling effects of vegetation under increasing pressures from urbanisation</li> <li>• loss of sequestered carbon in native vegetation</li> <li>• reduction of habitat for many native species, including state and federally listed fauna of conservation significance</li> <li>• loss of important wetland habitat</li> <li>• reduction in water quality for local wetlands</li> <li>• loss of highly biodiverse areas within the Perth region</li> <li>• fragmentation of remaining vegetation and wildlife habitat</li> <li>• spread of dieback to unaffected areas; and</li> <li>• loss of areas useful for nature recreation, research, and education.</li> </ul> <p>Cumulative impacts from native vegetation loss are likely to be felt more widely than the Perth east metropolitan region. The consideration of cumulative risk data beyond the east metropolitan region is recommended.</p>	
35	ANON-QTYN-1C8N-6 DBCA	<p>There is limited discussion of the cumulative impacts of this proposal on the local or regional environment and does not specifically recognise the cumulative impacts to Bush Forever Site 125.</p> <p>There are a number of sites where Banksia woodland, black cockatoo and wetlands are to be or proposed to be cleared for land development in the local and regional area (i.e. Perth Surf Park, the Maddington Kenwick Strategic Employment Area, Princep Road in Jandakot, Lot 123 Mortimer Road Casuarina and the Westport Freight Access Route), the additional information does not reflect on the cumulative impact this proposal may have when considered in relation to these other projects/developments.</p>	
36	ANON-QTYN-1C8X-G ANON-QTYN-1C8Q-9  ANON-QTYN-1C81-9	<p>The proposal is in contrary to Bush Forever policy to protect all Bush Forever sites.</p> <p>The assessment that the impacts on Bush Forever Site 125 are 'not considered to be a significant impact' where SPP 2.8 defines Bush Forever areas as a</p>	

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	ANON-QTYN-1C8N-6 ANON-QTYN-1C8D-V	'classification of land in the MRS to protect and manage regionally significant bushland in accordance with the policy'.	
37	DBCA	To assist in the ongoing retention and protection of those portions of Bush Forever Site 125, currently zoned Urban in the MRS, consideration could be given by the City to initiate reservation of areas of freehold owned by the City, as Parks and Recreation.	