Submission Perth Peel Green Growth Plan for 3.5 million

Comments are made according to sections in Draft Action Plans. Paragraphs from the report related to the comment are in italics.

General

I am disappointed detailed digital maps were not available for download, as was promised at the WALGA workshop in March.

Need for maintaining the existing green corridors for wildlife and public space and re-green if necessary. No infill developments on public open-spaces, even though many may not fall in the wildlife corridor category.

Building on any good agricultural land, like they did at Gwellup, should be forbidden and kept for agriculture. If concerned about drifting chemical sprays onto neighboring houses designate the areas for organic farming.

Draft Action Plan B : Rural Residential

The P&D Act provides the primary legislative framework for planning control in Western Australia. There are, however, a number of legislative instruments that establish separate planning regimes for locationspecific

areas, including:

- Metropolitan Redevelopment Authority Act 2011;
- Swan and Canning Rivers Management Act 2006;
- Perry Lakes Redevelopment Act 2005;
- Hope Valley Wattleup Redevelopment Act 2000; and
- Swan Valley Planning Act 1995.

The Swan Valley Planning Act (SVPA) is NOT a guidance for redevelopment, it is a <u>preservation</u> act. I do not know about the other acts, but the SVPA seems to be ignored in all Action Plans.

Draft Action Plan C : Infrastructure

3.2

Transport requirements are very much influenced by if an area is urban or suburban and what the future developments will be (Gordon, 2015). And by the development corridors as proposed by Newman (2015).

3.2.1

I know that ideally you need high density around railway stations, but here we have to ga against normal thinking, because we have to make up for the past planning mistakes. Include a circular link from Midland via existing track north, spur off to Ellenbrook and connect to Wannero / Joondalup. This rail can bring tourists into Swan Valley. This was proposal was submitted around 1992 before Ellenbrook was built.

3.2.2

In addition :

• Light rail from Glendalough Station via Scarborough Beach Rd (SBR) to Scarborough Beach. This would be in line with the planning proposals of the City of Stirling along SBR. This would be great for beach goers. Push for light rail that does use batteries instead of overhead powerlines.

3.2.3

Have a tunnel in Midland for the freight rail.

Curtin Uni's prof Newman's idea of a conveyor belt, instead of the Roe 8 Freight Link, for transport goods to the Fremantle harbour is a great idea. The conveyor system could be powered by renewable energy.

3.2.5

Perth - Darwin National Highway (Tonkin Highway to Muchea)

What guarantee is there that trucks will use the Perth-Darwin Hwy? Coming from Midland it would be shorter to keep using the Great Northern Hwy instead of using the new Perth-Darwin National Hwy.

3.4

Water resources are vital resources for the future of Perth (as for any community). Every time aquifers are drilled into or through there is a chance of leaking problems. Therefore any oil/gas drilling through drinking water aquifers are to be prohibited. The assurances of oil/gas companies of that there will be no problems are worth nothing, because they cannot guarantee 100% leak-proof seals. There is plenty evidence supplied by oil/gas industry and from independents to show the leakage rates are unacceptable high (Ingraffea, 2010, 2012, 2013, 2014).

<u>All</u> water treatment plants should provide water clean enough, as at Subicao plant, to be reinjected into aquifers, instead of being dumped in the ocean. Water conservation is critical, especially with rising seawater levels the challenge will be to keep salt water intrusion at bay. Therefore it is essential that all aquifers are replenished. This should should be paid for at state level because it crosses all local government boundaries and it is vital to the survival of Perth Why is there no colored risk table as in the Basic Raw Material Action Plan Draft to cover the 'green' and 'amber' paragraphs.

Draft Action Plan D : Basic Raw Materials

The Swan Valley Planning Act seemed to have forgotten or ignored when generating this section on BMR.

For the purposes of the Strategic Conservation Plan, BRM extraction relates to the environmental impacts of removal, processing and transport of the following materials:

- sand (including silica sand, but excluding mineral sand or garnet sand);
- clay (including shale but excluding oil shale);
- rock; and
- limestone (all types, including metallurgical limestone).

Clay is not a rock, and shale is a rock.

Rock is a very generic term, limestone is a rock. Need more precise description.

A major problem with quarrying on the Darling Scarp close to populated areas is the generation of dust and noise. In addition any further quarrying on the Scarp should be stopped and no new licences to be granted because the visual impact from amongst others the Swan Valley, which is a major tourist drawcard. Visitors do not want to see visual scars.

3.2

BRM extraction relates to the removal, processing and transport of sand, limestone, clay and hard rock. Most BRM extraction sites require access tracks, fencing and associated infrastructure such as temporary offices and weighbridge facilities. Site preparation ahead of extraction also generally requires the removal of vegetation and deleterious material such as tree roots and other organic matter. Topsoil is commonly stored on site for later rehabilitation purposes.

Storing elsewhere would increase the environmental footprint because of transport.

Sand is the most abundant and most needed BRM for the development of the Perth and Peel regions. It is an essential component of concrete and has many other uses in the construction industry including in mortar and plaster. In recent years it has been used in very large quantities for land fill purposes

Where is it really needed to do landfill? Developers like to have flat area to work from. However using the natural landscape should be used in general for the development sites. Developers will complain, but if the surface was hilly hardrock they could not infill it and would not blast it flat. Could recycled sand be used instead of it being landfilled? Especially along road verge filling. Resources of clean "building" sand are limited.

The extraction of sand is the simplest and least capitalised of all BRM. Many sands, especially fill sand, can be loaded directly into haulage trucks via a front end loader once the overburden has been removed. Sand can be extracted to a maximum depth of two metres above the water table in most areas, although this is extended to three metres in some areas to protect drinking water supplies.

4.2.1

What impact will it have on the watertable? Will it be perched? Will there be more waterloss do to upward movement, because the new surface is closer?

Crushed hard rock aggregate comprises a large component of concrete and has many other uses, particularly in infrastructure, such as road and railway construction. Hard rock quarries are excavated by pattern drilling and controlled blasting.

No mention of overburden/topsoil handling and relationships to the watertable.

3.4

The Department of Mines and Petroleum's (DMP) principle closure objectives are for rehabilitated mines to be (physically) safe to humans and animals, (geotechnically) stable, (geo-chemically) non-polluting / non-contaminating, and capable of sustaining an agreed post-mining land use. The rehabilitation requirements for individual sites will vary significantly between mines and will depend upon the type of mining, nature of the surrounding environment and the agreed post mining land-use. Rehabilitation in a BRM context typically comprises designing and reconstructing appropriate landforms post mining; preservation and re-application of soils (top soil) and stockpiled vegetation; additional seeding where required; and or other specific requirements (e.g. re-establishment of pine plantation, commercial development) as necessary to support the agreed post mining land use.

Are the bonds required high enough to cover the real cost of rehabilitation? Lately there have been regular articles in the newspapers that the bonds are too low to cover the rehabilitation of mines/quarries. Not only in WA but also in other states. An alternative approach would be rehabilitation insurance in addition to the bond in case the bond falls short. If costs rehabilitation is not carried by resource company it is the taxpayer who picks up the tab, so in essence subsidises the business.

1. Reinstate "natural" ecosystems to be as similar as possible to the original ecosystem.

2. Develop an alternative land use with higher beneficial uses than the pre-mining land use.

3. Reinstate the pre-mining land use.

4. Develop an alternative land use with beneficial uses other than the pre-mining land use.

Are point 1 and 3 the same?

4.1.2

If native vegetation clearing is proposed, an application for a clearing permit must be submitted to the DMP for assessment under delegation from the CEO of the Department of Environment Regulation (DER).

Isn't there a conflict of interest , on one hand promoting resource extracting and the other doing environmental assessment. The EPA should look after the environment, not DMP.

Table 4.2

Royalties Nil. Royalties payable to the State under the Mining Act when any minerals are produced or obtained from a mining tenement.

Need for reporting in order to monitor environmental issues. Part of running a business is having

a social licence to do so. Environmental impact on private land falls under this social licence.

Table 4.3

Future Resource Extraction area Submission of application for native vegetation clearing permit (no biodiversity survey work required).

Why not? Have previous surveys cleared the area? Are surveys uptodate? Are any of the surveys freely and easily downloadable to the public?

Draft Action Plan H : Conservation Program

3.3.1

Water quality of the Swan Canning catchment is currently managed by Parks and Wildlife in partnership with the Department of Water. A new taskforce will be established to oversee water quality improvements within the Peel-Harvey catchment. The taskforce will report to the overarching Executive body responsible for implementing the Strategic Conservation Plan (see Chapter 5 of the Strategic Conservation Plan).

Appears to create more bureaucracy. Why not have a management joint-working-group between parks and Wildlife with Department of Water that carry out the required work

In order to meet the phosphorus inflow target of less than 75 tonnes per annum for the Peel-Harvey coastal catchment, it is necessary to achieve a further reduction of 30-35 tonnes/year of phosphorus inflow on top of the reductions that are projected to be achieved through the targeted mandatory soil testing program. In the absence of other alternatives that can be effective on this scale, it is proposed to implement a drainage intervention program to deliver a further reduction of phosphorus inflows to estuary of 30-35 tonnes/year.

Need to encourage less usage of phosphorus. Phosphorus is an essential element in plants and animals. All that is washed into the ocean or lakes is lost for ever. Since the concentrations will be too small to "re-mine" them in the future.

References and Bibliography

David Gordon, Professor at Queens University, Ontario, Canada:

- Patrec perspectives : Estimating the size of Australia's Suburban Population (2015)
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Anthony Ingraffea, Professor at Cornell University, NY, USA; YouTubed presentations :

- Facts-on-Fracking (Nanticoke, PA; late 2010)
- Hydraulic Fracturing Myths and Realities (Uni Chicago, IL; February 2014)
- Latest Evidence on Leaky Gas Wells (Butler, PA; Nov 2013)

- *Marcellus Shale Exposed* (Bethlehem, PA; March 2012)
- Whistleblower Dr Anthony Ingraffea on Fracking Shale (Delaware Riverkeeper, DE; August 2013)

Peter Newman, Professor in Sustainability at Curtin University.

• Sustainability – Are we winnning? TEDx (2015) https://www.youtube.com/watch?v=6RFiyM89rbk

Kind regards

Humphrey Boogaerdt

PaYUng Contracting

"We do not inherit the Earth from our Ancestors, We borrow the Earth from our Children" by Moss Cass (Australian minister Environment and Conservation 1972-1975)

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