

**Friends of Moore River Estuary's
Response the Draft Perth and Peel
Green Growth Plan for 3.5 Million**

1 Introduction

The Friends of the Moore River Estuary (FOMRE) are pleased for the opportunity to once again assist in the planning process by providing comments on the draft “*Perth and Peel Green Growth Plan for 3.5 million (GGP3.5)*”.

The GGP3.5 is a broad base planning document designed to set the parameters for development and conservation of the Perth Region. While recognising the broad scope of the plan FOMRE will however focus its response on the impact of the plan on the Moore River Estuary (MRE) at the northern most point of the Strategic Assessment Area (SAA). In particular we wish to bring attention to three specific issues.

- The possible addition to the proposed extension of the Wilbinga Nature Reserve to include the Moore River Company (MRC) land south of the MRE. This land is currently being offered for sale by the Moore River Company (MRC).
- A small extension of the SAA to include the Town of Guilderton and land south of Guilderton Road to Indian Ocean Drive.
- FOMRE’s support for the establishment of a conservation area between Guilderton and Seabird.

2 Friends of Moore River Estuary

FOMRE was established over twenty years ago in response to a proposed rezoning of land immediately south of the MRE. Since then FOMRE has prepared submissions to assist in the development of the Gingin Shire’s town planning scheme and the local planning structure plan, and the WA Planning Department’s Gingin Coast Structure Plan. FOMRE participated in the reference group for the development of the Coastal and River Management Plan for the South Guilderton Development.

FOMRE has in conjunction with the Guilderton Community Association and the Lower Moore Working Party participated in several community based infrastructure and environmental projects.

Recently FOMRE has acquired water monitoring equipment to commence a long term project to monitor the water quality of the Moore River Estuary. This project is being assisted by the Northern Agriculture Conservation Council and the Department of Water. The Gingin Water Group is conducting similar monitoring of the upper Moore River.

2.1 Objectives of the Friends of the Moore River Estuary (Inc.)

1. To foster and promote the appreciation and protection of the natural landscapes of Moore River Estuary, its water quality and marine life;
2. To write, publish and make submissions, or with any other person or group produce or publish any material in support of appreciating or protecting the natural environment of Moore River Estuary;

3. To become affiliated with or subscribe to any other association or bodies whose objects are similar to the objects of the Friends;
4. To do and perform all acts matters and things necessary to be done and performed so as to encourage the protection of the Moore River Estuary natural landscapes and environment.

3 Expansion of the Wilbinga Conservation Park

The GGP3.5 proposes an expansion of the Wilbinga Conservation Park by the addition of areas of State forests. It states:

“This proposal is part of the initiative to create a network of conservation areas from Yellagonga Regional Park, north through Neerabup National Park to the coast at Wilbinga Conservation Park and east to Yeal Nature Reserve.” (Draft Action Plan H page 28)

FOMRE supports this proposal and commends the planning for a ‘green zone’ north of the expanding metropolitan area.

This action will bring the Wilbinga Conservation Park right up to the MRE, with the exception of a small pocket of coastal land south of the MRE. This land is currently owned by the Moore River Company (MRC). The MRC land has been the subject of some controversy over the last 20 years. It is currently been approved for development and has reached the sub-division approval application stage. The MRC appears to have reviewed their intentions regarding the development and has recently offered the land for sale in its current state.

Even though now approved for development the decisions reaching this point have been controversial. The initial approval to rezone the land deferred urban was unusual as the Outline Development Plan supporting the rezoning was produced by a planning consultant who was simultaneously engaged to consult for the Shire and the MRC. Despite being warned about the conflict of interest and the sustainability of the proposed new settlement the then Shire Council went ahead to amend their town planning scheme to accommodate the rezoning.

Subsequently the WA Planning Department through its Gingin Coast Planning Structure Plan process determined that development of the MRC would not be sustainable under the new settlements policy, particularly because of the lack of local employment opportunities to support the size development proposed. The WAPC rejected the development on sustainability grounds. MRC appealed to the State Administration Tribunal which dismissed the appeal also on the grounds of unsustainability. MRC then lodged an appeal with the Supreme Court where it waited for some time for a hearing.

A new Planning Minister then intervened to approve a reduced development plan and the Supreme Court Appeal was withdrawn. We believe the Minister acted because he felt the developer had been disadvantaged having first received an approval to rezone the land and then have his plans rejected.

The question of the unsustainability of a large residential area beyond reasonable daily commuting distance from employment opportunities remains problematic.

There is now through the expansion of the Wilbinga Conservation Park a means to resolve this issue. The MRC have expressed an interest in selling the land. If the Government acquired this land the Wilbinga Conservation Park would extend to the MRE.

The land south of the MRE including the MRC land has seen an increase in the presence of Carnaby Cockatoos since the reduction of pines plantations in the region. Wilbinga Conservation Park, the MRC land, Guilderton and areas north have increased in importance as habitat of the Carnaby Cockatoos.

Recommendation: Land currently owned by the Moore River Company be purchased and added to the Wilbinga Conservation Park.

4 Extension of the Strategic Assessment Area to include the whole of the Moore River Estuary

In his book "A Sense of Place" the late Professor George Seddon made the following observation which stands as true today as it did when written in 1972. He said:

"The people of a city influence the use of land far beyond the confines of their city. Recreational pressures are felt in a steadily expanding area, especially along the coast. The whole coastline of south-west Australia, from Geraldton to Esperance, either already does, or soon will, lie within the land-use ambit of the City of Perth. It is for this reason that the maps of the central sector of the coastal plain have been drawn to include three estuaries: the mouth of the Moore River at the northern boundary, the Swan estuary in the centre, and Peel Inlet, the drowned estuary of the Serpentine, Murray and Harvey rivers at the southern boundary. These estuaries are a major recreational resource, but they also represent very complex physical and biological systems, and they will all need careful management in the future. Management of these resources will have to call on a variety of highly trained professional skills and continuing research programmes. Estuaries are interesting because they represent the confluence of a number of distinct environments: the land, the river and the sea. Meeting places are always interesting. Our taste in landscape almost always chooses them: the meeting of plain and mountains, or a mountain and sky, or land and water in any form. But boundaries and transitional areas are also, as a rule, the most biologically productive areas. This is especially true of estuaries: they are major breeding grounds for much marine life, and this age-old function of estuaries the world over is being threatened by the heavy use our species now makes of them. Our three estuaries are all in fair health at present, but the pressures on them have hardly begun" (Seddon 1972, A Sense of Place, University of WA Press, pp4-6).

Seddon includes the Moore River Estuary as one of three estuaries of the Swan Coastal Plain. It is the smallest of the three and the one most closely in its original state. Being the smallest the MRE is likely to be less resistant to the pressures of development and agriculture activities.

The SAA defined for GGP3.5 reaches the southern bank of the MRE but does not include the MRE. It may have been seen as convenient to use the Moore River as a physical feature to define the northern boundary of the SAA but with a little more thought this does not make any sense. The measures contained within GGP3.5 to manage the surrounding influences on the quality of estuaries particularly the Swan and Peel will only apply to the southern shores of the MRE and not to the north. You can't half protect an estuary, particularly as the Moore River receives most of its recharge from ground water.

FOMRE therefore suggests that a slight expansion of the SAA would be sensible. The SAA could be expanded to cover the whole of Guilderton and the agricultural land between the Moore River and Guilderton Road through to Indian Ocean Drive. Guilderton Road then forms a physical boundary to the SAA as well as providing a buffer zone north of the MRE. This proposal shifts the boundary of the SAA about 1 to 2 kilometres.

Recommendation: The SAA be extended to the whole of Guilderton Town Site and extending along Guilderton Road to Indian Ocean Drive.

5 Guilderton-Seabird Conservation Area

Although outside of the SAA the plan proposes a Phase 1 acquisition of land to establish the Seabird Conservation Park between the towns of Guilderton and Seabird. FOMRE commends this action. It is consistent with previous planning that foresaw the sharing of infrastructure by the two towns.

Phase 2 also caters for the expansion of the Seabird Conservation Park as more land is acquired.

FOMRE suggests that consideration also be given to allowing a minor road to connect Guilderton and Seabird along the edge of the proposed conservation area. This would make it easier for the towns to share community infrastructure and to provide each with a second egress route in the case of an emergency such as a bushfire.

6 General Comments on the GGP3.5

FOMRE has over twenty years made contributions to local and state planning plans and policies. Often to be dismayed when agreed programmes and policies are subverted for political reasons. Plans seldom survive a change of Government or worse ignored by the Government that initiated the plan/policy in the first place. Planning documents do seem to have a very short life indeed.

Significant planning documents that should ground the development of GGP3.5 are the Network City which was designed to contain city sprawl within a green belt and Bushland Forever to preserve remnant bushland.

Plans need to be underpinned by good bipartisan legislation that will survive changes in administration or at least have the oversight of Parliament when changes are necessary.

FOMRE has experienced conditional development approvals being thwarted by developers who initially agree to conditions and then convince Government Departments or Ministers to revoke conditions on the grounds of the difficulty in meeting the environmental requirements.

7 Conclusion

FOMRE supports the development of GGP3.5 provided it has bipartisan support, faithfully considers community wishes including those of conservation groups, that it strengthens previous conservation measures such as Bushland Forever, and that it is politically resilient.

We have included two recommendations in our submission.

1. Land currently owned by the Moore River Company be purchased and added to the Wilbinga Conservation Park.

2. The SAA be extended to the whole of Guilderton Town Site and extending along Guilderton Road to Indian Ocean Drive.

In addition we give particular support to the proposal to establish to Seabird Conservation Park.

FOMRE again thanks the Government for this opportunity to again contribute to the planning process.