

Albany Region Plan

A submission by the Environmental Protection Authority on the document released for public comment by the Department of Planning and Urban Development

**Environmental Protection Authority
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THE PURPOSE OF THIS REPORT

This report is the Environmental Protection Authority's submission to the review of the document released by the Department of Planning and Urban Development entitled "Albany Region Plan".

This submission is not a report under Part IV of the Environmental Protection Act, and there are no provisions for appeals against the Authority's views expressed in this submission.

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1. Introduction

The Albany Region includes the Town of Albany and the Shires of Albany, Denmark and Plantagenet. The Department of Planning and Urban Development has prepared a Region Plan for this area containing objectives and strategies to guide land use in the Albany Region over the next 20 years (Department of Planning and Urban Development, 1993b). The Plan contains a strategy map which indicates the preferred generalised land uses over the Region during this time frame.

The Albany Region Plan is the last of several steps in the Albany Regional Planning Study. Previous steps included public workshops, publication of a Regional Profile (Department of Planning and Urban Development, 1991a) and a Regional Rural Strategy (*ibid*, 1991b) as well as the preparation of several technical documents. The Environmental Protection Authority commends the Department on its Regional Planning initiatives and the extensive public consultation which was part of the preparation of the document.

This report is the Environmental Protection Authority's submission on the Albany Region Plan. The Authority's submission should be seen as offering suggestions for its improvement.

2. Environmental issues and allocation of land uses

The strategies and objectives provided in the Albany Region Plan are only at a very broad and general level. However, within the Albany Region there are various land use allocation and development proposals which have the potential for environmental impact. These include:

- agriculture, intensive horticulture and aquaculture;
- abattoirs, wool scourers, tanneries and general industries with solid and liquid wastes;
- provision of infrastructure in particular utilities such as roads, rail, powerlines, water and gas pipelines, telecommunications facilities, etc;
- tourism and recreation;
- urban and light industrial development; and
- water resource developments.

Two essential aspects of environmental management at this broad level are: the matching of land use with suitable land that can sustain the activity without causing undue environmental degradation, and the provision of broad environmental management requirements to provide guidance to proponents to enable them to establish activities in an environmentally acceptable manner and to select appropriate development sites.

The Authority considers that the Albany Region Plan in its final form should provide more background information on the above issues and greater guidance by including statements on environmental policy and principles which could be readily implemented via local government authorities through their Town Planning Schemes or Local Rural Strategies, or by other agencies. For instance, the Bunbury - Wellington Region Plan provided a useful level of information and guidance for land use and development, and consideration of environmental issues (Department of Planning and Urban Development, 1993a). The specific major issues of concern to the Environmental Protection Authority are discussed below.

2.1 Catchment management

The Environmental Protection Authority has previously identified the major environmental problems in the south coastal region and provided environmental guidance notes for land use development in this area (Environmental Protection Authority, 1988: Bulletin 319). The Authority's particular concerns relate to the estuaries of the south coast and their catchments. Studies have shown that the Wilson Inlet at Denmark, and the Princess Royal and Oyster Harbours in Albany, and their hinterlands are already experiencing environmental stress as shown by nutrient enrichment within the estuary water bodies (Environmental Protection Authority, 1988; Estuarine Study Series Number 4; *ibid*, 1990; Estuarine Study Series Number 8; Environmental Protection Authority, 1990; Bulletin 426).

The Authority recognises that to be successfully implemented, environmental and land use policies and principles need to gain acceptance at the community and individual land holder level. The Authority's experience is that there are strong indications within the study area that local government, Land Care District Committees, Catchment Management Groups, industry groups and individual land holders recognise the need for a new approach to traditional issues.

The Environmental Protection Authority supports the use of surface water catchment boundaries as an essential part of land use planning. A major benefit to be gained from using boundaries derived from the natural environment is the potential for greater integration of the management of land use by private land holders and, advisory and regulatory governmental institutions to ensure that land use is sustainable.

In support of planning on a catchment basis the Authority has provided the broad policy framework of environmental objectives for water quality, remnant vegetation, industrial land use, residential land use and plantations on farmlands in the above mentioned Bulletin 319.

The Strategy Plan has identified areas which are potentially suitable for land uses such as Horticulture and Grazing and Cropping. In some instances there are significant constraints to the ability of the land to sustain these land uses. For instance the water quality of the Irwin and Wilson Inlets and the fresh water resources of the Denmark River need to be protected from nutrient pollution and siltation which can be caused by these land use activities. The most effective means to plan and manage these requirements is catchment management boundaries, with site specific studies required to determine that each case meets specified environmental objectives and management principles to ensure sustainable land use and protection of highly valued public resources.

The Environmental Protection Authority concludes that the estuaries of the Albany Region and their catchments are already showing signs of environmental stress. The Authority recommends that the Albany Region Plan should include land use allocations on a catchment basis within a broad policy framework which includes a specific section on the setting of environmental objectives.

2.2 Conservation of the natural environment

The Environmental Protection Authority has recently restated its position in regard to setting aside representative portions of the natural environment for the conservation of flora, fauna and landscape values (see for example Environmental Protection Authority 1993b: Bulletin 680, *ibid*, 1993c: Bulletin 681, *ibid*, 1993d: Bulletin 683). In summary, the Authority considers that an adequate and representative system of reserves should be set aside for the conservation of flora, fauna and landscape. Such reserves should be properly managed and given security of tenure commensurate with their conservation value. The Authority's primary arrangement for identifying reserves to be established for conservation purposes is through the Conservation Through Reserves Committee studies which were commenced in 1972. The Authority's proposals for conservation in the Albany Region are identified in Systems 2 and 3 (Environmental Protection Authority, 1976).

2.2.1 Conservation reserves identified on the Strategy Plan

The Albany Region Plan provides a Strategy Plan (Figure 4 of the Region Plan) which identifies and maps preferred land uses. This map indicates conservation areas within the Region. The Authority considers that the Region Plan could be improved by identifying the different forms of conservation reserves throughout the region. That is the National Parks, Nature Reserves, Conservation Parks and State Forests should be shown. The security of tenure for each of these land uses in regard to management for their conservation values is variable and should be shown as such. The land uses which are appropriate to locate next to each reserve type may vary.

The reserve system which provides the basis for the Strategy Plan should be derived from the proposals identified in Department of Conservation and Land Management's Management

Strategies for Forests of the South-West, and the South Coast Region, Regional Management Plan 1992 - 2002 (Department of Conservation and Land Management, 1992a and 1992b). The proposals in these recent management strategies effectively implement the requirements for representative reserve identified in the Environmental Protection Authority's Systems 1, 2, 3, 5 'Red Book' (Environmental Protection Authority, 1976).

The Authority concludes that the conservation land uses identified on the Strategy Plan are not clear enough and need to be updated. The Authority recommends that the Strategy Plan show the different types of conservation areas and be based upon the proposals presented in the Department of Conservation and Land Management's proposals detailed in the Management Strategies for the South-West Forests 1992, and the South Coast Region Regional Management Plan 1992 - 2002.

2.2.2 Strategy for conservation of the natural environment

The Region Plan should promote the principle of a tiered approach to the protection of State, regional and local level conservation values and resources by developing a hierarchical system of conservation reserves using landscape protection areas and specific corridors to link conservation reserves. Local government authorities should be involved by identifying areas of local conservation importance and protecting these reserves through appropriate Town Planning Scheme zonings and provisions.

The first conservation tier should be the protection, consolidation and enhancement of existing reserves which includes National Parks, Nature Reserves, Conservation Parks, Regional Open Space and the areas proposed for conservation which are identified in the Conservation Through Reserves Committee 'Red Books' (*i.e.* Systems 2 and 3). In addition, special high value areas can be identified after appropriate evaluation through the Regional Planning process.

The second tier of conservation protection should be achieved by the addition of land to existing conservation estate through Town Planning Schemes and appropriate land use zoning. The Authority views the regional planning process as facilitating the implementation of this second tier, by designating areas of landscape protection and specific vegetation corridors to link conservation reserves which can be identified in the Strategy Plan. In this regard, the 'green spines' identified on the strategy map should follow all water courses, and join conservation areas. However, the system appears incomplete. Attempts should be made to indicate the areas which are currently vegetated and those which require rehabilitation. Continuous corridors along the road and water courses are a preferred strategy for the 'green spines' concept. There is also a need to provide guidance to the later phases of the planning process by listing management provisions needed to ensure that these areas will either be revegetated or protected from clearing, as the case may be.

The third tier of protection for conservation values is at the subdivision control stage, exercising controls over land use and the design and siting of buildings and retaining or supplementing overall vegetation cover, particularly using deep rooted locally indigenous species. Local government authorities should be involved by identifying areas of local conservation importance and protecting these reserves through appropriate Town Planning Scheme zonings and provisions. Local conservation strategies can be developed by councils to assist in protecting locally significant conservation values.

The Environmental Protection Authority concludes that the implementation of strategies aimed at reserving representative areas for conservation is not adequately covered in the Albany Region Plan. The Authority recommends that the Albany Region Plan promote a hierarchical system of conservation reserves and management responsibilities, including the development of local conservation strategies to provide links between conservation areas which are managed at a State and Regional level.

2.3 Proposed industrial sites

2.3.1 Principles of industrial location, management and control

The management guidance provided in the Authority's Bulletin number 319 'Environmental guidance for land use and development in southern Western Australia' includes objectives as well as principles for location, management and control of industrial developments (Environmental Protection Authority, 1988; Bulletin 319).

In principle the Authority supports the concept of identifying and setting aside areas for industrial uses. However, the environmental principles for setting aside areas for industrial use include:

- determining the suitability of the land to site industry in relation to capacity to sustain operational activities *e.g.* geological and meteorological characteristics;
- separating industrial areas from land uses which would be sensitive to the off-site impacts such as noise, odours and gaseous emissions from industry;
- managing the operations of industries so that off-site impacts and risks fall within prescribed limits at the boundary of the industrial area; and
- managing the liquid and solid waste streams from industrial operations so that no additional off-site impacts occur.

Further detail is provided in the Authority's Bulletin 319 (Environmental Protection Authority, 1988). The Authority has also provided more specific advice on location studies for industrial sites at Geraldton (Environmental Protection Authority, 1991; Bulletin 606) and Kalgoorlie (Environmental Protection Authority, 1991; Bulletin 607).

During the preparation of the Albany Region Plan a Regional Industrial Strategy was prepared as a technical discussion paper. The Regional Industrial Strategy presented information about the demand for and potential location of Heavy (category A), Special (Rural) and General (category B), Light and Service (category C), and Cottage (category D) Industries (Whelans, Sinclair Knight and Partners, Quilty Environmental Consulting, 1992). The potential locations for the Heavy and Special / General Industries have been transferred into the Albany Region Plan.

This technical document provided a brief overview of some environmental issues related to establishing locations for industry. However, the Authority believes that full consideration should be given to all of the environmental issues described above, particularly for Category A and Category B industrial development sites.

The Region Plan does not provide any background information about the reasons for having chosen the identified industrial sites. The environmental management strategies which should be identified at this broad strategic planning level are also missing from the Region Plan. Furthermore, the technical documentation (Regional Industrial Strategy) provided only brief consideration of some environmental issues.

The Authority concludes that the Region Plan does not adequately describe the reasons for choosing industrial locations, nor the need for the industrial sites shown on the Strategy Plan, nor provide adequate guidance for managing the environmental impacts of these industries. The Authority recommends that greater consideration should also be given to environmental issues such as land suitability, buffers, operational management, liquid, solid and gaseous waste disposal to provide the broad environmental management principles for all industrial developments in the Albany Region. These issues and their management requirements are essential items in the consideration of industrial activity and should be explicitly discussed in the Albany Region Plan.

2.3.2 Specific industrial sites

It is very difficult to assess the placement of 'heavy' industry in a regional context with little specific information about the industries which are likely to be involved. Notwithstanding that, issues such as buffers, transport routes, liquid and solid waste disposal, effluent discharges to wetland, river, estuarine or marine systems, groundwater pollution, air emissions (dust/particulates, gas and noise) and odour, and risks and hazards are all relevant issues. The Environmental Protection Authority has issued policies on air emissions (dust, sulphur dioxide and noise). The buffer requirements for 'heavy' industry are nominally 1000 metres, but may change with regard to detailed investigations depending upon topography, meteorology and type of industry under consideration.

The Strategy map has identified four potential heavy industry locations, these are:

- West of Narrikup;
- Wellstead - Cape Riche, near the Southdown iron ore deposits;
- Cheyne Beach, near the heavy mineral sands deposits of Hassell Beach; and
- West of Denmark, within the catchment of the Kent River.

The Environmental Protection Authority considers that there are a number of major constraints to heavy industrial developments at two of the sites. The Wellstead - Cape Riche and the Cheyne Beach proposals are likely to be environmentally unacceptable because of the impacts upon the nearby National Park areas. In addition, water resources, energy supply and conflicts with tourist and recreational travellers are considered to be major impediments to these particular locations.

If there is a real need to define any potential heavy industrial sites in the Albany Region then a formal site selection study should be conducted and a structure plan prepared with associated environmental management requirements. This documentation could be sufficiently specific to enable the Environmental Protection Authority to conduct formal environmental impact assessment as has recently been completed for a proposal to establish a heavy industrial park at Mungari near Kalgoorlie (Environmental Protection Authority, 1993a; Bulletin 675). Otherwise, and as an alternative, the Authority believes that no industrial sites should be identified in the Albany Region Plan, and case-by-case assessment, as the need arises, would be more appropriate in an area such as the Albany Region where there is no demonstrated demand at present.

The Environmental Protection Authority concludes that the Wellstead - Cape Riche and the Cheyne Beach proposed heavy industrial sites would be likely to be found environmentally unacceptable. If there is a real need to define potential heavy industrial sites, the Authority recommends a site selection study be conducted and a structure plan prepared with associated environmental management requirements as support documentation for a formal environmental impact assessment by the Authority.

2.4 Proposed service utility corridors

The Strategy Plan shows service utility corridors running in parallel to the major road transport routes into the Town of Albany. The utility service corridors are to provide access for transport, electricity, water and gas services to the proposed 'Heavy' and 'Special' industrial sites. The corridors are nominally positioned two kilometres from the major road transport routes and are one kilometre in width.

As is indicated above, there is no demand established for the industrial locations which the utilities are intended to serve. In addition, the corridors pass through a number of conservation reserves which would be severely impacted.

The Environmental Protection Authority considers that the approach to locating the corridors is not adequately documented. A proper route selection study would be required to locate appropriate corridors. In addition, such a corridor would require formal environmental impact assessment to assess environmental acceptability and ensure the corridor was set aside for the stated uses.

The Environmental Protection Authority concludes that the location of the service utility corridors has not been adequately determined, and that environmental issues have not been considered. The Authority recommends that demand for the corridors be demonstrated and a proper route selection study be undertaken, prior to identifying utility corridors on the Strategy Plan.

3. Other issues

The Region Plan has been preceded by a number of other public and technical documents. The information which is contained in those previous stages of the Regional Planning Study should be made more obvious in the Albany Region Plan document itself. In particular the catchment management basis for land use which was evident in the Albany Regional Rural Strategy, even though the information was at a very broad level only, provides a more suitable framework for preparing a land use strategy with associated planning and environmental guidelines (Department of Planning and Urban Development, 1991b).

The Authority considers that the Albany Region Plan should be the culmination of the previous studies and provide a single reference document which establishes the reasons for proposed land use planning and include the broad environmental management principles and goals for these land uses.

4. Conclusion

The Environmental Protection Authority has long held and published views that the estuaries and catchments of the south coast area are showing signs of environmental stress. The Authority has identified in this report and in previous studies the appropriate management goals and practices which should occur in this region. The Authority believes that within the Albany Region there is substantial recognition of the need to appropriately manage the impacts of land use activities upon the Regions catchments and estuaries.

The Environmental Protection Authority considers that the Regional Planning process is fundamental to achieving the necessary improvements in land use and management which are required to improve the environmental health of the valued ecological systems of the Albany Region and to ensure continuing sustainable land use. The regional planning process should also facilitate the management and maintain the integrity of reserves set aside for conservation of representative portions of the natural environment. Land use proposals on the Region Plan should give due consideration, within the text of the document, to separating conflicting land uses and identifying the management requirements for land uses (such as industrial developments) which have the potential for significant off-site impacts.

The comments offered in this submission are general observations and are an attempt to assist the Department of Planning and Urban Development in preparing a final Albany Region Plan. This submission does not preclude the Authority from undertaking formal environmental impact assessment of specific proposals at a later date.

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