

**NEW SUMMARY OF SUBMISSIONS**  
**Draft Banksia Woodland Management Plan**  
**Advertising Date: 26 July 2024 – 23 August 2024**

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
E24/11765	1.	I am supportive of the principles proposed in relation to fire management of these banksia woodlands i.e. fire exclusion where at all possible, and fuel management only of areas subject to weed infestation/ ongoing disturbance/ human interface.	Acknowledged.	No action required.
IN24/19761	2.	<p>I have some thoughts I would like to contribute to the Draft Banksia Woodland Management Plan.</p> <p>There are a lot of different reserves within the shire including road reserves, shire reserves, parks and wildlife managed reserves, private reserves etc. I believe any management plan the shire puts into place must liaise with these other stakeholders. This is to ensure works completed in all these different categories of reserve are synergistic and don't negatively impact on other reserves. Particularly for fire management strategies and weed control.</p> <p>For example, a way to help protect a shire reserve could be to keep the road verge as bare as possible to prevent fire starting on the verge and jumping into the reserve. As a volunteer firefighter I have seen this happen numerous times.</p> <p>I believe this would also help all parties keep up to date with the latest research trends, particularly in banksia woodland and fire management. For example, the new research coming out of Murdoch University about the impact of fire in the Lowlands Reserve, a long unburnt patch of bush.</p> <p>I am happy to discuss any of this further.</p>	<p>The MP will be amended to include liaison with other landholders.</p> <p>The MP will be amended to include fuel control on adjacent road verges.</p>	Amend the MP to include liaison with other landholders, fuel control on adjacent road verges and keeping up to date with the latest research.

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			The MP will be amended to include keeping up to date with the latest research.	
IN24/19770	3.	<p>My comments re the above plan -</p> <ol style="list-style-type: none"> <li>1. It is a very sad state of affairs that there is a small number of reserves within the Shire (excluding National Parks) and a very low area in each of the reserves, and even smaller amount of Banksia. The Shire of SJ need to increase the amount of, and area of reserves and bush forever sites.</li> <li>2. I am concerned that the figures quoted (\$\$\$) on each of the Action Plans are very low and too dependent on budgets. Retaining and hopefully increasing the Banksia Woodlands is critical!</li> <li>3. The timing on the review and revision of each Action Plan is too long as much can change over 10 years and monitoring and implementation of the Action Plan for each reserve (3 years) is too long</li> <li>4. In each Action Plan, the likes of Landcare SJ Inc are mentioned a lot in regard to responsibility. A lot more support (including financial) of and consultation with needs to occur. It does seem that these groups have large responsibility which is ok if the Shire is going to support with much larger amounts than what is referred to in these plans.</li> </ol>	<p>A great ambition but not practical in terms of budget.</p> <p>Acknowledged.</p> <p>With four management plans to implement, shorter time frames are not practical.</p> <p>The Shire provides significant support to Landcare SJ Inc. Agreed that consultation is vital.</p>	Revisit the section on policy and legislation.

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		<p>5. Likewise, the timeframes given for the flora and vegetation condition monitoring and mapping, and fauna surveys of every five years should be shortened to every two.</p> <p>6. It is critical that the Shire do more to provide more corridors for fauna, particularly Carnaby's as they require these areas for their young to rest and feed.</p> <p>7. Fauna needs and impacts need to feature more prominently in the report.</p> <p>8. In regard to policy and legislation, I think this could be reworded and added to.</p> <p>9. It is a huge document, does each reserve require an Action Plan or could one plan cover all the reserves mentioned??</p>	<p>Acknowledged.</p> <p>The Shire's Urban and Rural Forest Strategy aims to increase connections.</p> <p>Acknowledged.</p> <p>This section will be revisited.</p> <p>Individual Action Plans for each reserve will assist with management.</p>	
IN24/20211	4.	<p>The key lens that the "Draft Banksia Management Plan" will be viewed through in this submission is sustainable environmental stewardship. In essence the question to be asked is: "Will the current environmental capital (with particular focus on Banksia Woodlands) be maintained over time, and how?"</p> <p>In overview the legacy of fragmentation from sustained, unsustainable urbanisation, mining and other land uses and changing burn practices could well be for Banksia Woodland to be banished. The current regime to date of ad-hoc urban planning from the Serpentine/Jarrahdale Shire (under the strong, often misguided hand</p>	<p>Acknowledged.</p> <p>Acknowledged.</p>	<p>Revise the MP to clarify references to volunteers in section 4.3.2.5, revisit perspectives on bushland as nature-built infrastructure, check references to responsibilities, and revisit management</p>



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		<p>changing that mindset is to get rid of the delusion that economics can or should be separate from the environment. One can't be economically responsible and sustainable without also being environmentally sustainable. Environment, and its care, is not just an externality to the economy.</p> <p>Hopefully in the near future carbon pricing will help put economic value on keeping our remnant bushland areas (including Banksia Woodlands) and the benefits they provide. Carbon pricing will help take accounting into the real world. Living things have a dollar value as well for all the life-giving services they provide as well as keeping us alive to create a concept of economy that has sustainable environmental stewardship as part of its core business.</p> <p>Increased insurance costs arising out of extra carbon into the atmosphere since industrial revolution giving us wilder weather and wildfires shows clearly examples of action in the natural world producing consequences in the economy. There are other personal costs such as increased air conditioning costs to help make the case that environment and our economic well beings are connected.</p> <p>So now to the S/J Banksia Woodlands.</p> <p>On page 21 reference is made in Section 2.6 Policy and Legislation to EPBC Act (1999). It was mentioned that:- "In 2016 Banksia Woodlands in the Swan Coastal Plain were listed as endangered under this Act." When the Draft Byford Development Strategy was put out a few years ago it was stated that Brickwood Reserve was a Bush Forever site protected by State level biodiversity legislation. That nevertheless would have allowed for a development proponent to</p>	<p>The revised Climate Change Strategy provides for carbon pricing.</p> <p>Acknowledged.</p> <p>Acknowledged.</p>	

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		<p>argue for excision of a part of that Reserve for (human) built infrastructure to be built on part of the nature built infrastructure of Brickwood Reserve. The Shire planners seemed to have been unaware that there was the Federal level EPBC Act (1999) protecting the Brickwood Reserve as a parcel of 3 Threatened Ecological Communities. They did indeed correct their statement that the Reserve had only the relatively weak State level Bush Forever protection. This was simply a classical example of planners not quite understanding the worth of such bushland as a vital nature-built infrastructure S/J Shire asset. With the parlous, fragmented state of Banksia Woodlands in S/J Shire care it should support stronger protection of the remnants identified in the Draft Plan. It should also petition the relevant State planning and environmental protection agencies to better safeguard the Shire's Banksia Woodlands in line with the endangered status accorded to such woodlands as referred to on page 21 of the Draft.</p> <p>The Draft Banksia Woodlands plan did mention that it was important to retain as much of the Woodlands as possible for possible future offsets (page 41). This extremely transactional attitude to the last vestiges of these endangered ecologies needs to be exposed for the fraud that it is. The concept of offsetting allows two or more parcels of ecology (nature-built infrastructure) to be linked in the mind of a development proponent on the basis that one will be destroyed for some human built infrastructure while the other nature-built infrastructures are retained or restored. The effect of this delusional environmental accounting trick is a nett loss of environmental capital in flagrant violation of what sustainable environmental stewardship is</p>	<p>Banksia woodlands are not listed as Endangered under State legislation. State agencies do not always give due regard to the Federal listing.</p> <p>While offsetting does result in net loss of remnant vegetation, it can also be useful in</p>	

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		<p>supposed to be. This is nothing more than second rate accounting.... and bad economics as well as poor environmental stewardship.</p> <p>Healthy Banksia Woodlands like other native bushland areas are particularly good at storing carbon and providing many other natural infrastructure services on agriculturally marginal land. In fact I see our bushland areas including Banksia Woodlands as libraries of living information with answers to questions we haven't yet thought to ask, if we but give them space and don't simply build our stuff on top of them as if they did not merit any respect at all except as space for housing etc.</p> <p>On page 29 the damaging effects of "Fire Regime Changes" is elaborated on. It is noted that fire frequency is now commonly 7 years or less. Recommended highest frequency is 8 to 16 years between burns. The lowest burn frequency was up to 40 years. The ideal burn frequency of 24 years was given.</p> <p>The major threat of State sanctioned Fire Mitigation regulations is barely mentioned as part of a Planning and other interests guaranteed death nell for sustainable stewardship of all Banksia Woodlands in any urban context. What can reasonably be done to ensure our remnant Banksia Woodlands can be cared for in our urban contexts when burns from vandals combined with fuel control burns and State sanctioned fire mitigation regulations combine to work against their survival as part of where we live?! Could the authors of the Draft explain or show how such a conundrum can be solved to give the reader hope? Where are the positive examples and actual burn</p>	<p>helping to protect areas of remnant vegetation.</p> <p>Acknowledged.</p> <p>Acknowledged.</p> <p>The Shire is unaware of any examples of positive burn regimes other than those on private property.</p>	

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		<p>regimes practices to give the reader hope that humans and Banksia Woodlands can live together sustainably?</p> <p>There is a place here for this Shire, together with WALGA perhaps, to make a case to the State level Planners for stronger commitments and on ground compliance action to keep our natural areas in our urban areas as part of sustainable planning for a vital liveable city that celebrates nature rather than seeing it as a nuisance to care for. These natural areas need to be among the people and not relegated like some sort of exile to national parks away from where most people live.</p> <p>Under section 4.3.2 Threats and Pressures, bottom of page 42 reference was made to conflicts among user groups. The conflicts mentioned were basically people pastime (eg Pony club and Men's Shed for instance) versus bushcare/Landcare interests. The basic problem is that Shire vested bushland was seen as a kind of Terra-nullius, ie it was seen as empty of infrastructure: instead of seeing it as the homes and nature-built infrastructure for the creatures in our care to share space within our urban areas. It's been too easy to say "Oh it's just the bush", as if that thing were infinite and could not have its survival impaired by our thoughtless actions. It was thus thought it did not need consideration to be seen as at least as important as the empty paddock over there.</p> <p>The planners should have put the men's shed, and the pony club on the paddock and let those interests grow up the trees to make those places liveable rather than knock down parts of the last vestiges of an endangered ecosystem such as Banksia Woodland. By the death of</p>	<p>Acknowledged.</p> <p>Much of the infrastructure on Shire reserves was established at a time when bushland was not protected, and reserves were seen as recreational resources.</p> <p>Acknowledged.</p>	



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		<p>1000 cuts of excisions etc the Report has shown we have lost 70% of the Swan Coastal Plain Banksia Woodlands.</p> <p>For our urban areas quality of life to be maintained and improved our sorry history of natural areas and heritage degradation as being synonymous with development needs to be replaced by positive attitude and action to restore nature as our neighbour as a core part of what sustainability focused planners aim for when they design and build developments with proponents.</p> <p>Comments on 4.3.2.5 Security of Tenure</p> <p>To put it succinctly:- Over reliance on volunteers for bushcare as a key thing to help keep bushland in a good condition is an abuse of trust by all levels of government. Well paid environmentally literate and focused people need to be close to the top of Planning food chain to make sure we have a vital healthy natural environment as a part of a sustainable S/J Shire and greater Perth Metro area. Volunteers have a vital role to play in raising concerns and doing some on ground works, but they should not be depended on to do environmental bandaiding and then pester the Planning and other interests to do the heavy lifting of sustainable urban planning who are paid to do that work.</p> <p>The tenure of land for Bushland and natural areas care needs top security for sustainable urban design and built reality for a city fit for people and the nature in our care.</p> <p>Planners and architects also need to get started on and normalise greenery (nature-built infrastructure) on to the walls and roofs of</p>	<p>Acknowledged.</p> <p>The references to volunteers in this section refer to club volunteers who maintain club infrastructure. This will be clarified.</p> <p>Acknowledged.</p> <p>Acknowledged.</p>	

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		<p>human built infrastructure in the Perth Metro area including S/J Shire. It's been done in Singapore and is being done in Melbourne in Australia.</p> <p>Comments on 4.4 Infrastructure.</p> <p>To quote from p 43:</p> <p>"The infrastructure present on each Shire Reserve is related to the current uses and user groups as listed in Tables 3 and 4."</p> <p>The Draft Author/S would benefit from using a slightly different perspective to see that the bushland (Banksia Woodlands in particular) areas of the Reserves mentioned are in fact Nature-Built Infrastructure and not a bit of Terra Nullius with no human built infrastructure and thus worthless (or undeveloped, or vacant). The people in charge of infrastructure, as well as much of the rest of our society, need to expand what they understand as built infrastructure to better integrate human and nature-built infrastructure to help create a city where people are not just neighbours to each other but also to the nature in our care. Without enough green space well integrated into our city it would become just another killer city. In recent years the national State of Environment Reports have reported that there are more deaths from heat stress than all other natural disasters combined; with the vast majority of those deaths in the very young and elderly whose thermo regulation are not as resilient as in majority of other age groups, particularly in the more socio-economically strata of our society.</p>	<p>The MP will be revisited to consider perspectives on bushland as nature-built infrastructure.</p>	

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		<p>The current default 16% tree canopy cover for Perth Metro is still on a downward trend, due in part to uncontained sprawl, climate change driven forest collapses and now the Poly-Phagus Shothole Borers. What does it say about our Planners that they are not speaking and acting more openly and energetically about the urban sprawl design failure that impacts the more tender and frail members of our society?</p> <p>Is it just a case of being asleep at the wheel and/or uncaring about their work and/or are they simply environmentally illiterate and uncaring? The information, positive examples and leadership are there if people search, but it needs courage and commitment to make the case to get sustainable urban design paid for and done as it has been in other places.</p> <p>Comments on Page 46 Action Plan</p> <p>In reference to "Table 4 Banksia Woodlands Action Plan" there is a Section 5.3 Responsibilities, Monitoring and Review.</p> <p>The first point of dot pointed contacts is supposed to be the:</p> <ul style="list-style-type: none"> <li>. Natural Resource Specialist and then the</li> <li>. Strategic environmental Specialist;</li> <li>. Emergency Service</li> </ul> <p>Etc</p> <p>Too much of this monitoring and review is not sufficiently action oriented and so is not just budget dependent but because sustainable environmental stewardship is regarded as a fringe or optional extra</p>	<p>Acknowledged.</p> <p>Acknowledged.</p> <p>This section will be revisited.</p>	

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		<p>when budget cuts are made environment gets hit first. Environmental officers are hard to hold onto when environmental budget is cut and so the quality of the green space in our urban environment comes under threat. Monitoring and review of Banksia Woodlands remnants will merely note and document their demise. Environmental people in the Shire and elsewhere need to be able to speak up to and influence and work with the Planners and others. They need the budgets commensurate with the responsibility of keeping S/J Shire liveable, healthy rather than just survivable by keeping natural spaces including Banksia Woodlands among people in our urban areas.</p> <p>Comments on Page 64.</p> <p>In Reference to Fig 2: Uses and Management Zones of Brickwood Reserve.</p> <p>West of the Briggs Park oval (of Fig 2) there should be a red highlighted zone as well as to the south to control and manage weed ingress from the oval into the adjacent bushland margins. The Shire has funded such weed control when budgets allow. Brickwood Reserve is a community of 3 Threatened Ecological Communities and as such deserve comprehensive care and maintenance as a core element of the Shire's and community (Nature Built) Infrastructure assets, with at least as much value as human built infrastructure such as the Briggs Park Pavillion.</p> <p>Comments on 3.3 Infrastructure</p> <p>The listing of infrastructure items that completely omitted explicitly naming Nature Built Infrastructure and has thus removed it from being</p>	<p>Acknowledged.</p> <p>This figure will be revisited.</p> <p>The MP will be revisited to consider perspectives on bushland as nature-built infrastructure.</p>	

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		<p>taken seriously by the people with the power, money and influence to make the most difference to it being properly cared for as an essential service provider for where and how we live.</p> <p>That blindness is as non-sensical as a fish arguing that water is not important because it is so immersed in it that it cannot see it because it's everywhere..... until it isn't. We better start seeing the natural world we're in while it's healthy enough to recover as an absolutely core part of decision making on how we build where we live to make Perth the best it can be.</p> <p>Another analogy from my life experience might help explain my concern at the unsustainable path we as a society are on in relation to sustainable nature stewardship, whether in relation to Banksia Woodlands or any other of our precious plant communities.</p> <p>I am an insulin injections dependent diabetic since 1961. To imitate normality, ie maintain homeostasis in blood sugar, anything like a non-diabetic is a 24 hour per day responsibility. It takes a constant commitment in time and resources to test and take action to regulate my body's sugar levels so I am not harmed or killed by not taking my responsibilities for that seriously.</p> <p>The time and effort needed for me to maintain equilibrium in relation to blood sugar is analogous to disabling the Perth's wetlands that filter rainfall and other run off before it enters the aquifers which used to feed springs and seepages that carried out landscapes through summer for free. Those wetlands could be seen as the kidneys of our waterways. As a community we need to expend extra effort now to harvest the water we need via desalination. It is do-able but it requires</p>	<p>Acknowledged.</p> <p>Acknowledged.</p> <p>Acknowledged.</p> <p>Acknowledged.</p>	

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		<p>extra time, thought and effort to get what we used to get for much less effort. The more we undermine other nature built self regulation mechanisms such as the carbon cycle through fossil fuels burning, landclearing and so on the harder we have to work to maintain any sort of homeostasis.</p> <p>We have taken our actions as a society, and now is the time to take positive actions to deal with the consequences.</p> <p>We need a clear focus on getting sustainable environmental stewardship done as a core part of what it is to be economically sustainable and do development and planning that does not cost us the Earth.</p> <p>The path that we are still on was summed up years ago by a "West Australian newspaper" cartoonist "Alston" in which a figure said in one caption that "We can't afford to save the Earth" and then in the second caption "But we can afford to destroy it".</p> <p>So it pointed an ironical finger at the stupidity of how easy it is to find money to foster Earth damaging projects but for some reason it's difficult in our economic fundamentalist time to find or make the case for money to save the Earth. That stupidity is expensive, but the people who pay are not the destroyers.</p> <p>I would like to believe I am a member of a community that believes that we can save the Earth, particularly as it relates to saving and restoring Banksia Woodlands in the S/J Shire.</p>	<p>Acknowledged.</p> <p>Acknowledged.</p> <p>Acknowledged.</p> <p>Acknowledged.</p> <p>Acknowledged.</p>	

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		While there may appear to be an element of repetition in my submission, that merely reflects the often repeated problem of how invisible the environment is as an essential part of a life worth living in our urban areas.	Acknowledged.	
IN24/20217	5.	In response to Submission No.4:  An amazing piece of writing, even given a multi-year time frame I could not have put that together. Two areas that I have extra concerns with are the use of chemical fertilizers and falling water tables due to lowering rainfall and increasing ground water extraction. We should be designing to re-charge aquifers but even this morning I saw a Shire crew deepening drains. Education is going to be long and hard.	Acknowledged.	No action required.
IN24/20222	6.	In response to Submission No.5:  Thanks for that. I may well add an addendum to the already Thesis long submission.  The drainage action by Shire workers reflects an attitude that water is the enemy. That'll make it harder for even tough trees like Banksia to survive future climate driven forest collapse	Acknowledged.	No action required.
IN24/20224	7.	In response to Submission No.6:  Yes, I believe that water table decline trumps Dieback deaths currently. Dieback you can chemically treat but if you run out of water we all die.	Acknowledged.	No action required.

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IN24/20225	8.	<p>Addendum to "Submission on Draft Banksia Management Plan: Ref SJ816 Submission No. 4</p> <p>To whom it may concern, it is possible that this correspondence is a copy of one sent earlier. Sorry if that's the case.</p> <p>A further two key issues have come to mind relating to care and maintenance of Banksia Woodland;</p> <p>1) The need for a commitment to do better integrated weed management that doesn't just depend exclusively on skilled use and users of appropriate herbicides, but uses this as part of an integrated weed management plan that uses traditional (First People's) skills in burning the bush and even weed burners in the appropriate contexts. There are many weeds for which burning, among other methods, can make a valuable and sustainable contribution to non herbicide methods to complement and minimise damage from even carefully applied herbicides for weed control in restoring and regenerating Banksia Woodlands bushland remnants;</p> <p>2) The Shire is still excavating and deepening urban drainage channels, this further stressing remnant bushland types including Banksia Woodlands.</p> <p>To further rid the already parched, over-drained and forest collapsed plant community assemblages in the Perth Metro area is ill advised, foolish, environmentally illiterate engineering service type activity. If this sounds blunt it is because it should be, to clearly communicate</p>	<p>Sections on weed management will be revisited and expanded.</p> <p>Maintenance of existing drainage channels is considered to strike a balance between the competing priorities of protection of property and the environment.</p>	<p>Revise the MP to revisit and expand sections on weed management.</p>



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		<p>how unacceptable it is to blindly and blandly carry on what we've always done without enough reflection on the consequences.</p> <p>As a Mechanical Engineer I know in the Charter of the Institution of Engineers that we are advised in the top two items that a key responsibility of engineers is to be of service to the greater community (beyond engineering) and the concerns they have.</p> <p>There are many community leaders recognising the urgency of addressing the generations of environmental deficits inflicted upon ourselves and future generations.</p> <p>Thus to engage in poor environmentally thought out engineering service activities, such as intensifying wetland drainage is to also fail in doing your engineering job properly with full regard to environmental sustainability.</p> <p>No part of our society is exempt from doing sustainable environmental stewardship as part of their core business whatever else that is.</p>	<p>Acknowledged.</p> <p>Acknowledged.</p> <p>Acknowledged.</p> <p>Acknowledged.</p>	
IN24/20267	9.	<p>In response to Submission No.6:</p> <p>Thanks so much for the interest you have shown here.</p> <p>I believe you are 'on the money' , tho we need to get thru to the planning "Gurus" , if they are such...</p> <p>The idea of offsets is strange to me.. just leave the bush as it is and plant houses in the already cleared parcels...</p>	<p>Acknowledged.</p> <p>Acknowledged.</p>	No action required.

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		<p>I do not understand why the WA Gov. is so keen to increase our population at the rate they seek, when we are already struggling to feed, water, and house those here.</p> <p>Maybe the states' Landcare movement should 'go on strike' and tell the Upper Level of Governments to sit up n listen !!!!</p>	<p>Acknowledged.</p> <p>Acknowledged.</p>	