

To whom it may concern,

I am a resident of Ballajura and I am extremely concerned about the proposed Aged Care Facility to be constructed on Paradise Quays. This development will be built on land adjoining Emu Swamp Wetlands which is also part of the Gnangara Water Mound.

I believe the excavation of this land not only for foundation work but also for an underground carpark will negatively impact the surrounding environment including the lake system in Ballajura.

The extreme depth of excavation for an underground carpark is enormous and I believe these needs to be stopped from going ahead as soon as possible.

It is quite a contradiction that on one hand the City Of Swan has been working to rehabilitate the lake system in Ballajura yet now they have allowed for future excavation and development to commence in the near future, in my view causing irreparable damage to the lakes.

Have the members of the Council actually thought about where the workers will be pumping out water that will inevitably be filling the excavation site? Pumping water out continuously while earthworks, excavation and concrete foundations are worked on will lower the water level of the lake system as these areas are all connected. The water table will definitely be affected.

There were two conditions put in place for any development at Paradise Quays Ballajura.

1. It was the Environmental Protection Authority's recommendation (2014 Report) to include an 80 metre buffer zone as a condition to any development on this site. The City Of Swan made this a condition for any development on this site. (Yet, the plans for Aged Care have not allowed for this 80m buffer zone. Why?)
2. Development on this land is to provide passive surveillance to the abutting Emu Swamp Wetlands.

In addition to this, as Emu Swamp Wetlands is an Aboriginal Heritage/Historical listed site, the Aboriginal Community is to be consulted prior to any development taking place.

I believe these conditions outlined above have not yet been met.

City of Swan has passed on all its responsibilities onto the developer Southern Cross Care who, in turn, have employed Element Planning/Consultants to carry out their public consultations.

I am deeply concerned at the way in which The City of Swan has handled the fast tracking approval of the master plan submitted by Southern Cross Care. It was presented to Council on the 5th December, 2018 and approved at the 12th December, 2018 Council Meeting. Hardly enough time to study and research any of the consequences that such a large scale development would have on our already fragile Emu Lakes.

In 2013 when the original public consultation was carried out by the City Of Swan it was for a 60 bed single storey and a 60 bed two storey building. The majority of residents in the Lakes Estate agreed to this concept. However the Council took it upon themselves to quickly rush through the following development without any consultation with the affected residents.

The new masterplan for Aged Care is vastly different and very concerning.

Located North of Paradise Quays-

A Block 1 x 4 storey - 40 independent living units

B Block 1 x 4 storey -39 independent living units

C Block 1 x 3 storey - 54 Bed residential care unit

D Block 1 x 5 storey - 52 independent living units

Located South of Paradise Quays -

E Block 1 x 5 storey - 54 independent living units (this includes an under-ground car park)

F Block 1 x 4 storey - 46 independent living units

G Block 1 x 4/3 storey - 34 intergenerational independent living units

In my view, this is far too big a development to be carried out on these wetlands.

My concern is the damage that such large scale excavations/earthworks/foundations will have on Emu Swamp Wetlands and Emu Lake considering that the Council has spent the last 10 years trying to rehabilitate Emu Lake and is even now in the process of building a wetland embayment in the central section of the lake.

At the 16th January, 2019 Council Meeting there was a lengthy report on EMU LAKE WETLAND EMBAYMENT, BALLAJURA.

Part of these states, 'In parallel to treatment actions, the City has been conducting regular water quality monitoring, measuring Total Phosphorus levels. Commenced in 2010, the results have demonstrated a steady decline in TP from a peak of just over 120ug/L in the summer of 2010/2011 down to 45ug/L during the summer of 2017/2018. The Australia New Zealand Environmental Conservation Council (ANZECC) water quality guidelines for TP are 60 ug/L which Emu Lake levels currently satisfy without the central treatment embayment. However, there are infrequent spikes above the ANZECC levels that continue to occur due to conditions, with a recent TP spike detected in April 2018.'

'Cyanobacteria and blue-green algae blooms de-oxygenate the water, killing water based fauna and present a health risk to residents who frequent the lake shore or who may come in contact with the water. Despite the overall trend in reduced TP, there is no clear evidence that the system will remain healthy over the long term. As Emu Lake is a closed system.'

It was at this Council Meeting that the LAKES ESTATE ACTION GROUP voiced our concerns at such a large scale development and presented a petition for Council to hold consultations with the residents. I also asked questions about these issues.

Because of my deep concern for the environment I have obtained a report from the DEPARTMENT OF WATER AND ENVIRONMENTAL REGULATION.

‘Dewatering of Soils at Construction sites.

Purpose -

The note advises on how to minimise harmful effects from soil dewatering on water resources and dispose of excess groundwater.

Potential problems are -

- Contamination of waters used for agricultural or domestic water supplies or recreation.
- Excessive change to levels of nearby surface water bodies, harming their ecology and vegetation.
- Lowering of the standing water table in water supply bores.
- Mobilisation of nutrient-rich water into surface water bodies, increasing nitrogen and phosphorous loads that may lead to algae growth problems.
- Reduction of dissolved oxygen in waterways.
- Toxic metals and arsenic release due to the disturbance of acid sulphate soils.
- Turbidity and sedimentation in surface waters.’

I believe that it is so crucial for these matters be addressed BEFORE any development commences and NOT AFTER, as all precautions must be taken to prevent any more environmental damage from occurring on our already fragile lakes system.

I also wish to share the concerns of many residents regarding potential irregularities of the Council including lack of transparency and the potential failure of some on the board (current and previous) to accurately declare a conflict of interest.

Thanking you for your time and consideration in this matter,

Viola Marrapodi

Concerned Lakes Estate resident.

And

Mike Hatzidakis