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Native Vegetation Conservation Branch
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Submission Re – Application for Clearing Permit (CPS 5081/1) advertised in *The West Australian* of 11/6/2012

Mark R Glazebrook, Area Permit, Lot 201 on Deposited Plan 65098, Wattle Grove, Shire of Kalamunda, house, pool, shed and paddocks, 0.438 ha,(CPS 5081/1).

Encompassing certain objections to Clearing Permit Application submission processes in general

To whom it may concern,

The Urban Bushland Council presents the following submission with regard to the advertised Clearing Permit Application referred to above:

The Urban Bushland Council takes a close interest in Applications for Clearing Permits affecting bushland and native trees in the metropolitan area and in proposals potentially involving the clearing of urban bushland remnants generally.

The UBC is particularly concerned about clearing proposals that will potentially impact on areas of special significance – such as the eastern side of the Swan Coastal Plain. This landscape has long been recognised as having high biodiversity and poor rates of reservation in a bio-geographic region (the Swan Coastal Plain) that exhibits a level of biodiversity that is recognised on a global scale. The Council has made the point over and over again in submissions to government that much of the remaining native vegetation and habitat that remains on the eastern side of the Swan Coastal Plain – especially south of the Swan River- exists in the form of small blocks or portions of larger blocks and that there is consequently a serious risk of the cumulative losses being overlooked and the ecosystem dying the “death of a thousand cuts.”

Our interest in putting the case for the conservation of these relatively small urban bush blocks – in this case on the extreme eastern side of the Coastal Plain – is, however, often frustrated by aspects of the Clearing Permit process itself. For a start, the extraordinarily brief “7 day submission period” is exceedingly unhelpful – especially in light of the fact that proponents are required to supply only the most scant details of the proposed impacts on native vegetation in the publicly available information associated with Applications. We have found that the Applications are not always posted on the DEC website at the time of the advertisement of the Application and the Application details and Maps frequently not only provide little insight into the existing native vegetation and the proposed impacts proposed thereon, but also provide insufficient data to allow interested parties to readily locate the sites themselves on the ground. Compounding this problem is the fact that many of these blocks, when physically locatable, are on private or securely fenced land that is not publicly accessible and which is obscured by surrounding vegetation or buildings. The Application subject to this submission is a good case in point – as is a clearing proposal that was recently the subject of a submission prepared by the UBC (9 May, 2012) in response to an advertised Clearing Permit Application for a small pocket of native vegetation within the secure FESA training facility in Dundas Road, Forrestfield (CPS 4981/1) – an Application subsequently approved with surprising alacrity.

The Wattle Grove vegetation subject to this submission is on fenced private land and does not abut public roads. It is also obscured by other vegetation that is not subject to the Clearing Application. The cross-

hatching on the aerial Map associated with the Permit Application may identify the vegetation subject to the Application but it also makes interpretation of the extent and condition of the native vegetation very difficult for the third party submitter. We are aware there is good quality native vegetation in the vicinity of the proposed clearing site and that what may appear to be disturbed areas largely cleared of native understorey vegetation on the Map are actually more accurately described in situ as native trees, shrubs and plants interspersed with patches of relatively bare natural earth.

One of our representatives contacted the Native Vegetation Conservation Branch of the DEC on Friday June 15, to attempt to get more information as to the exact location of Lot 201, Hartfield Road, but to little avail. Our representative could find no physical signage referring to either Lot 6 Hartfield Road or 6 Schofield Road, the latter address appearing on the website but not on the information we were sent upon request.

Clearing principles

1. Despite these obstacles, the UBC stresses its opposition to the clearing of pockets of native vegetation and habitat on the eastern side of the Swan Coastal Plain. While not having sufficient access to the native vegetation subject to this Application for a Clearing Permit to make detailed comments, we would state that our principal objection to the clearing of this native vegetation is that it would be at variance to the Clearing Principle (e) that “**Native Vegetation should not be cleared if it is a significant remnant of native vegetation in an area that has been extensively cleared**” *ie.* the eastern side of the Swan Coastal Plain (SCP) south of the Swan River. Notably this is the Government's Bush Forever policy as stated on page xiv Volume 1 Bush Forever (*viz* there is a presumption against clearing on the eastern side of the SCP) and we expect this policy to be upheld for this clearing permit application. Furthermore EPA Bulletin No 8 states that:

'However elsewhere on the Swan Coastal Plain native vegetation is highly fragmented. Therefore the maintenance of conservation reserves and all existing bushland patches, and the strategic restoration of ecological linkage function between them is a priority.'

2. The proposed clearing is also at variance with **principle (b) - significant fauna habitat** for the endangered Carnaby's Cockatoo and Forest Red-tailed Cockatoo. The tree species at very least will be feeding habitat, and there may be a roost site present or nearby (*ie* within 6 km) and there could be nest trees. This requires survey to identify this habitat and the proponent should be required to supply such information.

3. Given the inherent species richness on the eastern side of the SCP, the proposal is likely to be at variance with **principle (a) - ...comprising a high level of biological diversity**. An inspection of the site by an experienced botanist is needed to ascertain the condition of the vegetation. This information should also have been made available for comment.

The UBC trusts its objections to 7 day submission periods, and to the dismal lack of useful information regarding the native vegetation subject to Clearing Applications made available for those wishing to make submissions, and to the difficulties they are prone to encounter in endeavouring to do their own site investigations, and to the difficulties they may encounter locating the sites themselves, will be given due consideration. Given the UBC is of the very strong view that the clearing of native vegetation on the Swan Coastal Plain should now be a thing of the past, we resent public submission processes that do not even allow a reasonable and fair opportunity for us to put the case for conserving our natural heritage.

Yours faithfully

President
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