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**Submission – Re Application for Clearing Permit (CPS 4786/1) Advertised in
The West Australian, 9 January, 2012**

Golden River Developments Pty Ltd on behalf of the West Australian
Turf Club, Area Permit, Lots 102 and 9000 on Deposited Plan 72076,
Burswood, **Town of Victoria Park**, sand fill for urban development,
2.17 ha, (CPS 4786/1).

To whom it may concern

The Urban Bushland Council presents the following submission in regards to the advertised clearing permit application for the Belmont Racecourse area referred to above.

The UBC takes a close interest in proposals that will impact on native vegetation and habitat remaining in the urbanised parts of the Perth Metropolitan Area and the proposal to fill the large area around Belmont Racecourse with sand is such a proposal.

The UBC is aware that most of the area subject to the clearing permit application is not in a particularly natural state in terms of its condition and that it is heavily infested with non-native plant and shrub species. However, this is not to say the area has no environmental value as habitat or that it lacks potential for environmental rehabilitation and regeneration. Our impression of this proposal is that the filling of the area – which we assume would involve the destruction of its existing vegetation – would have a very significant impact on the riparian ecology of the Swan River.

The UBC would make the following points in relation to the area's existing environmental values (clearing principles appear in bold type):

1. It is our strong view that this is an **environmentally sensitive area**, being directly adjacent to the Swan River. Not only does the existing vegetation provide habitat for breeding, feeding, and refuge for native birds and some native reptiles, some native mammals, and for native amphibians and invertebrates, but its proximity to the Swan River also makes any proposal to disturb the area with extensive earthworks problematic. Our members have reported seeing such significant species as the Osprey quite frequently in the area, and have also observed quite a range of other birds of prey, including the Peregrine Falcon, utilising its trees and open spaces. As the river will always function as a natural wildlife corridor, virtually any riparian vegetation will have a special place as habitat for birds – both “bush birds” and water birds. There is a fairly large, shallow lake in the north-west

part of the site, close to the river, and, from our observation, it is frequently used by such water birds as native ducks and stilts. We would expect the area is utilised by the Native Water Rat and by native bats. The area provides habitat for snakes and is undoubtedly used by the Long Necked Tortoise for breeding purposes. Native frog species use the seasonally inundated depressions and gullies. Native insects will often travel along the river and use remnant native trees for feeding and breeding purposes.

It could be claimed that because the area is not in a pristine state and that it is in fact an altered and fairly degraded landscape then the notion of its having any ecological value could be discounted. The UBC would reject this view as its proximity to the Swan River gives it a particular significance both in terms of its current capacity to provide habitat for native fauna species and in terms of its potential to enhance the ecological values of the Swan River in the Perth area through environmental regeneration work on its banks and floodplains. At present a variety of native tree and shrub species can be seen in the area, including *Eucalyptus rudis*, *Allocasuarina obesa*, *Acacia saligna*, *Viminaria juncea* and even one small stand of *Albizzia lophantha*. We note that a significant number of the trees look like *Eucalyptus camaldulensis* and it is our suspicion that a proportion of the trees may be hybrids of *Eucalyptus rudis* and *Eucalyptus camaldulensis*. This does not diminish their actual habitat value as such and we note they appear to be proliferating in some areas of the site.

The site does not have much in the way of native understorey but we note there are areas of native rushes, including *Juncus kraussi*, and that halophytic native plants can be seen around the shallow lake beside the river in the north-west of the site.

It is our understanding that historically this area was used for dumping ash and other waste from the power station across the river in East Perth and that this is the source of some potential contamination. Such areas were often favoured for dumping all kinds of rubbish. If the area was used for such purposes and that there is some contamination it may be that existing vegetation helps to hold the contaminated deposits in place. We would have thought it would be the responsibility of the proponent to clean up the site as a condition of approval for development if it is indeed contaminated.

2. It is the UBC's view that native vegetation on the banks and directly adjacent to the banks of the Swan River should be accorded special conservation status. Because the Swan River is a major geographical landmark and a natural ecological corridor, and has special natural and cultural heritage values in itself, the maintenance of habitat for indigenous fauna in its environs is particularly important. In this way, it is our strong view that this proposal impacts on **Significant habitat for indigenous fauna**. The UBC is convinced this site is of particular significance for native bird species and has great potential to be developed as habitat for other indigenous fauna.

3. It is our view that the area subject to the clearing application includes portions that constitute **Significant Remnants of Native Vegetation**. Fringing native vegetation is sorely lacking along the Swan River in its inner city reaches and it would have to be said it has mostly been cleared. For example, there is a particularly fine stand of *Eucalyptus rudis* trees in the north-east portion of the site and there would be no justification for clearing it. These trees are host to a great many native insect species, and, in turn, the smaller insectivorous birds, like pardalotes and Grey Fantails and Western Warblers are attracted to them. These trees were certainly not planted, unlike some of the other clusters of such trees up and down the river, so they constitute a remnant of special significance.

4. The area subject to the clearing application is certainly growing in association with a watercourse – that being the Swan River – and in association with what we would describe as wetland. The proposal therefore impacts on **Watercourses and wetlands** and therefore the principle of avoiding such impacts should be invoked. Virtually all the native vegetation on the site is typical of the fringing vegetation of a watercourse and there should be no argument against the proposition that the Swan River is a significant watercourse. If Swan River were to flood, most of this area would be inundated, so we can only assume the fill is also intended to raise the height of the land surface above the level of the river.

5. The existence of the native vegetation in this area contributes to the overall functioning of the Swan River as an ecological corridor and provides such remnants as Bush Forever Site 314, directly across the river, with an augmentation and “stepping stone” for native birds and insects to access this reserve. In this way the approval of the clearing permit would impact, indirectly, on the **Environmental values of a conservation area**. Bush Forever sites, such as Site 314 on the Swan River foreshore at Mount Lawley and Maylands, have limited value in isolation and need all the linkages they can get.

Our overall impression of this clearing permit application and its purposes is that it extends far too close to the Swan River and that it impacts on important native vegetation and habitat. The very quiet and largely inaccessible nature of this area contributes to its habitat values and we are strongly opposed to development impinging so close to Swan River’s foreshore. The better stands of trees should be reserved, the lake area close to the river should be retained, and the development area should be set back much further from the river.

Yours faithfully

Vice President

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