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Planning Coordinator

Swan Coastal Plain South draft management plan

Department of Parks and Wildlife

Locked Bag 104, Bentley Delivery Centre

WA 6983

Dear Sir/ Madam,

**Submission: Swan Coastal Plain South draft management plan 2014**

The Urban Bushland Council presents the following submission regarding the *Swan Coastal Plain draft management plan 2014*.

**Introduction**

The Urban Bushland takes a keen interest in the protection and appropriate environmental management of conservation reserves on the Swan Coastal Plain. The Coastal Plain has environmental values of international significance and the southern portion subject to this draft plan has been very heavily impacted by urbanisation and agriculture. Despite the vehement objections of community groups such as ours, urban development continues to eat into remnant natural areas south of the Swan River. Consequently the relatively modest area that has been set aside for conservation is of particular importance and its appropriate environmental management will help determine whether current and- ideally- enhanced levels of natural biodiversity can be sustained into the future.

Many native fauna species have virtually disappeared from the Swan Coastal Plain since European settlement, and many habitat types have been vastly reduced or have been significantly degraded. It is the UBC's very strong view that it should be the objective of the Department of Parks and Wildlife and the Conservation Commission to not only maintain our existing natural environmental values but to restore those that have been lost to as great an extent possible. Building sustainable populations of those species that have been lost to the region over the past two centuries is a worthwhile objective within that overall management task. The Council is fully aware there is a range of threatening processes frustrating efforts to maintain let alone enhance the Coastal Plain's environmental values and biodiversity but we have a responsibility to direct sufficient resources and energy to this endeavour to allow present and future generations of West Australians – and any other visitors for that matter - the opportunity to experience and appreciate the magnificent natural flora and fauna which millions of years of adaptation have produced to inhabit the region.

That being the case, the *Swan Coastal Plain South draft management plan* is an inadequate document with goals that seem disappointingly modest. The “desired outcomes” are unobjectionable but the actual objectives seem to centre on the protection of “threatened” communities and species. The UBC does not want communities or species “sliding off the planet” but it does not want management objectives limited to a “lifeboat” strategy whereby preventing

extinctions of individual species is apparently considered sufficient in itself in terms of the overall conservation goal. The UBC certainly agrees with allocating the required resources to threatened species and communities but “preventing extinctions” is a somewhat minimalist focus ‘after the horse has bolted’ and we recommend much more positive initiatives to strengthen the ecological viability and sustainability of habitats and populations that are reasonably familiar and commonplace and which must remain so. Biodiversity protection requires conservation of what is common.

Some comments relating to specific aspects of the *draft management plan* are set out below:

### **Overview of the Swan Coastal Plain**

The document states that “the principal management objective for much of the conservation reserves on the Swan Coastal Plain is to **conserve flora and fauna, and landscape condition.**” The council is of the view that this should be the principal management objective for all the conservation reserves *and also for off-reserve conservation; ie for the whole landscape of the Swan Coastal Plain.* Conservation of flora and fauna is not just conservation of isolated individual species, but also includes conservation of ecosystem processes. ***This requires a whole landscape objective.***

The UBC strongly agrees with the statement that “The consolidation, expansion and ongoing management of the formal conservation reserve system are key strategies for biodiversity conservation on the Swan Coastal Plain.” The Council takes the very strong view that much more reserve area together with formal conservation of their ecological linkages is needed to secure our biodiversity into the future. By this we mean the reservation of more land that currently has no formal – or even informal - conservation reserve status.

The *draft plan* correctly observes that urbanisation and population pressure in the region will put more stresses on the natural ecology in the coming decades. What we do not want to see is the progressive isolation of conservation reserves in otherwise hostile environments. This will require not only the creation of more conservation reserves but *much more consideration of “off-reserve” issues.* It is certainly the case that reserves vested in the Conservation Commission at present in the Perth Metropolitan portion of the Planning Area are so limited in total area as to be totally inadequate in themselves to protect the biodiversity of the “Northern Parks and Reserves” zone, for example. Given that DPaW is the lead agency in ensuring the state’s biodiversity is protected, it would seem to the UBC that the department should not restrict its interest and involvement to parks under its own specific control but should also be taking a much more active role in addressing the problem of continuing habitat loss through land clearing, for example. On that point we would make it clear that the acquisition of additional reserve land through the use of so-called “environmental offsetting” processes is of exceedingly dubious value when it is understood that it ALWAYS results in net habitat loss. The UBC would be less opposed to “offsetting” if there were plenty of habitat to spare but it is obvious land clearing has put the system into serious environmental deficit. This problem is just exacerbated when developers can simply provide funds for land acquisition as the price for destroying vital habitat for species such as Carnaby’s Black-Cockatoo. These offset practices are being erroneously used to justify unacceptable clearing and habitat destruction.

Local Government Authorities and other land managers are also in a position to help create landscapes conducive to the protection of biodiversity through establishing their own reserves and planting locally indigenous trees and shrubs where opportunities are available. Too many LGA’s are avoiding the use of locally indigenous - and even native - trees and shrubs in local planting programmes for parks and streets when the use of such species could greatly assist indigenous

insects and birds which are essential pollinators - in traversing and utilising urbanised areas of the Swan Coastal Plain. The widespread planting of exotic trees in commercial landscaping and by Local Government throughout metropolitan Perth is not conducive to the maintenance of indigenous bird or insect populations. The UBC takes the strong view that agencies charged with protecting our biodiversity should not restrict their attention specifically to conservation reserves under their control, or even to conservation reserves alone. Ecological linkages and landscaped gardens are also significant opportunities for use of local species and this should be strongly promoted by DPAW.

### **Management plan area**

The figure of 81 conservation reserves and about 21,000 hectares being reserved on the southern Swan Coastal Plain might seem considerable until the scale of the region itself is taken into account. Many reserves are of very modest dimensions and it is only the Central Parks and Reserves of the Planning Area that tend to impress the observer in terms of their scale on a map of the region. Even then the reserves are located very much in the western portion of the region along the coast. The UBC's overall impression is that the Conservation Commission/ DPaW hold and manage a great deal less land in reserves than we would have expected – particularly in what is described as the Northern Parks and Reserves portion of the Planning Area. Given that DPaW would be generally be expected to have the greatest expertise in the management of conservation reserves the relatively small total area under its control in the Perth Metropolitan portion of the Planning Area is noteworthy and somewhat surprising. The UBC definitely wants more land generally set aside for conservation in the region but whether existing land set aside for conservation purposes would best be vested in the Conservation Commission or other bodies such as LGAs should be carefully assessed. It is obvious, however, that with only a limited amount of reserved area under its control in the more urbanised parts of the Perth Metropolitan Area, DPaW cannot, by any means, be regarded as the sole authority on management issues in such a context.

The UBC would be interested to know if the Conservation Commission plans to take on the vesting of more Bush Forever sites in the Perth Metropolitan Region. ***Does this plan include the ~70 Bush Forever Areas that were supposed to be transferred to the formal conservation estate as A class reserves vested in the Conservation Commission and managed by DPAW?***

The on-going protection and management of many of these sites will probably be significant in the conservation of a range of threatened species and communities into the future and DPaW's willingness to become involved in the management of these sites is a matter of some interest to the UBC.

### **Key values and threats**

The UBC notes: *“The planning area is renowned as one 34 of the world’s richest and most threatened reservoirs of plant and animal life, and is the only one in Australia recognised by the International Union for the Conservation of Nature (IUCN), and lies within an internationally recognised “biodiversity hotspot.”*” The Council also acknowledges other important attributes of the region such as its superb wetlands, its varied ecosystems, its threatened species and communities, and its tuart woodlands.

The UBC strongly supports the recognition and protection of Aboriginal cultural association with the natural landscapes of the region. We would take the view that not enough has been done to protect Aboriginal heritage visible in the form archaeological artefact scatters and so forth in natural settings and not enough has been done to recognise Aboriginal culture and its association with the region generally. The UBC is strongly in favour of any initiatives which build community awareness, knowledge and appreciation of traditional and on-going Aboriginal associations with the natural landscapes of the region.

## Threats

Despite the outstanding natural attributes of the region and the international recognition thereof, the UBC is alarmed at the lack of urgency with which governments at every level address the serious threats which endanger so many of its unique environmental values.

### Serious omissions

The Council agrees with the identification of the key threats facing the regions' ecosystems and biodiversity but this list is incomplete. These threats need to be addressed in earnest. Importantly some key threats are omitted or are understated. For example the threat of actual and Potential; Acid Sulfate Soils (ASS and PASS) is seriously understated as acidity issues. Further the acidification of Bassendean sands as a result of falling water tables is omitted. Information and advice concerning recent research and this now extensive threat to ecosystems should be obtained from Dr Stephen Appleyard of DER. The failure of government through DOW to properly control and manage groundwater abstraction on the Swan Coastal Plain is now a serious threat and should be addressed in the management plan.

The *draft plan* does not appear to be proposing any major new strategies to deal with any of the threats. This is disturbing since, to our knowledge, none of these threats are abating and most of them, if not all of them, are getting progressively worse. DPaW is in a position to undertake, or at least facilitate, research into measures that can mitigate some of the worst threats and we would like to see stronger commitments along these lines. It is also in a position to enforce stricter hygiene regimes with respect to such problems as *Phytophthora spp.* spread and can also allocate more resources to weed control.

### Conservation Reserve System

The UBC agrees with the goal of creating a "conservation reserve system that is comprehensive, adequate and representative" (CAR). However, the Council does not support any notion that the region's natural values and biodiversity should become restricted to and more or less impounded in discrete conservation reserves. **It should be the objective of governments to protect natural landscapes and biodiversity in the broader region and not just in allocated conservation reserves.** Indeed it is exceedingly unlikely that formal "conservation islands" which have no ecological relationship at all with the landscape around them will be sustainable in the longer term. The document states that:

The planning area lies within the Swan Coastal Plain Interim Biogeographic Regionalisation for Australia (IBRA) region. As at 2011, 10.5 per cent of The Swan Coastal Plain was protected in the conservation reserve system. All proposed additions will help in increasing the proportion of reserves in the formal conservation reserves system.

It is not clear here which "conservation reserve system" is being referred to and we would have to assume this "conservation reserve system" includes reserves not vested in the Conservation Commission or managed by DPaW. This should be clarified. Areas with recognised conservation values may be in some category of "reserve" but still face an uncertain future. **A great many Bush Forever sites are not securely protected and, as the name would suggest, the public has a right to expect they eventually will be. The UBC sees the full protection of the Bush Forever inventory as being vital to the protection of the biodiversity of the region.** There are many smaller bushland remnants that might be called "reserves" in the Perth Metropolitan Area that have "Parks and Recreation" – type zonings at Local Government level and that is the extent of their protection. Given they provide the only suitable local habitat for many native species – such as

various insect, reptile and birds species – their on-going protection is surely vital to the protection of the region’s biodiversity generally. The UBC has never accepted the distinction drawn between “regionally” and “locally” significant habitat remnants – particularly when the latter designation has been used to justify clearing operations. The UBC wants bushland remnants and indigenous trees, birds, reptiles and mammals to remain part of the character of Perth as a whole and it is apparent to us that nomadic or seasonally migratory native birds make use of smaller bushland remnants as they move between larger habitat areas. It is for such reasons that the UBC believes the Conservation Commission and DPaW should not restrict their interests to reserves under their own control.

The document states that: “*As at 2011, 10.5 per cent of the Swan Coastal Plain was protected in the conservation reserve system.*” We regard that as a thoroughly unsatisfactory figure and, in any case, we are not sure what “the conservation reserve system” actually refers to. Presumably it does not refer to land vested in the Conservation Commission exclusively. Furthermore, the figure of 10.5 percent refers to the Swan Coastal Plain as a whole rather than the Planning Area – being the Swan Coastal Plain south. How much of the Planning Area is in secure conservation reserves? The goal under Bush Forever – which includes the local reserve network – is for at least 30% to be conserved. ie an additional 20% should be conserved under LGA processes to link with the minimum of 10% under Bush Forever Areas.

The document specifies a “key performance indicator” as being “The area of conservation estate in the planning area.” The UBC takes the view that the “conservation estate” could do with very considerable expansion in the Planning Area and we would hope that such expansion would not be at the price of destroying habitat elsewhere - as frequently occurs in the offsetting process. Environmental management is not at such an effective level that it could be said to compensate for habitat loss – despite this claim appearing regularly in development proposals. What is really required is *formal habitat protection and ongoing management* and not simply in the reserve system. It is the UBC’s very strong view that Clearing Permits are too readily issued and that there are too many exemptions. This is not an irrelevant matter. It is a serious environmental concern and those charged with protecting our biodiversity into the future should be addressing these habitat loss problems more effectively.

## **Managing the Natural Environment**

### **The Physical Environment**

#### **Climate Change**

Climate change issues are extremely concerning. Significant warming and drying trends have already been observed in the south west of Western Australia and the EPA’s predictions that “*by 2030 there will be up to 2 degrees Celcius rise in temperature in all seasons and that there will be a 20 per cent reduction in winter rainfall from 1960 to 1990 levels*” are alarming. The UBC has no reason to doubt such predictions and can only assume the climate science behind them is essentially reasonably sound. What it does point to is an ecosystem under increasing stress. The UBC member groups have seen first hand the effects on bushland and wetlands of the prolonged dry periods that have occurred in recent years and if these extended periods with minimal rainfall become more of a feature of our climate, the effects on our biodiversity could be very severe. Of the strategies proposed in the *draft plan* to address this issue the UBC is most supportive of that of making “*additions to the conservation estate in the planning area.*” Drought and heat stress are likely to cause tree and plant deaths, reduce flora recruitment levels, and significantly reduce the amount of food resources available for fauna. Even the lack of availability of drinking water puts fauna under stress – as does severe heat. In such circumstances, the size of the total habitat area would be critical in that adequate food resources would be more sparsely distributed, and in a larger total area there

would be a greater probability of some refuge habitat being available for specific fauna or flora species.

The impact on wetlands of climate change and falling groundwater levels will be and indeed already is disastrous for obvious reasons. Some wetlands have already been lost, and Lake Gngangara has acidified. Much greater attention will have to be given to such issues as off-reserve groundwater extraction and acid-sulphate soil problems. ***The management of groundwater levels – by firm controls on abstraction by all sectors is essential bearing in mind that it is the private and commercial agricultural users which use more than 60% of water on the Gngangara Mound. Local Government is also a big user as is the Water Corporation for potable public supply.***

## **Geomorphology**

We note that: “The Pinjarra Plain is the most common landform on the Swan Coastal Plain, yet the least represented in the formal conservation reserves.” The UBC has long campaigned for protection of existing remnant habitat areas on the eastern side of the Coastal Plain and is of the view that DPaW should make a priority of getting more of this remnant vegetation proper reserve status. Notably Bush Forever policy states that there is a presumption against clearing on the eastern side of the Swan Coastal Plain – but this policy is not being enacted.

## **Hydrology**

There are many wetlands of major conservation significance in the Planning Area and we note that “about 80 percent of the existing conservation reserves in the planning area contain Conservation Category wetlands list in the *Geomorphic Wetlands Swan Coastal Plain dataset*.” An awareness of the hydrology associated with wetlands is essential to keeping them in good condition into the future. This is another area in which DPaW has to broaden its focus and consider off-reserve impacts.

However, it is not only wetlands that are affected by hydrology. Falling water tables due to drought and excessive groundwater water extraction have both been shown to detrimentally impact Banksia woodlands and other apparently dry land vegetation types. This is especially the case for vegetation on the Bassendean landform. Groundwater monitoring is probably necessary in most larger conservation reserves to ascertain the effects of seasonal and long-term fluctuations on the health of native vegetation.

## **Biological Environment**

The UBC notes that the *draft plan* does acknowledge the very high conservation values of the Planning Region but is totally unsatisfied with the less than urgent agenda for protecting them. Urban development, dieback, weeds and climate change are bashing into remnant habitat on a daunting scale but the *draft plan* seems to be essentially a more-of-the-same document. The UBC believes that the management plan requires substantial review if it is to be of any use. It must include management of off reserve issues and ecosystem scale threatening processes. Much more radical clearing controls are needed and much more research into dieback, effects of acidity on vegetation and fauna, and weed and feral animal control are needed.

We recommend that DPaW conducts some workshops with community bushcare groups and LGAs to gather the wisdom of their experience and local knowledge.

## **Flora of Conservation Significance**

The UBC is not satisfied that ‘translocations’ constitute an adequate conservation measure when threatened flora is in the path of development. The number one principle of biodiversity

conservation in the National Strategy for the Conservation Of Australia's Biological Diversity has been for many years that *'biodiversity is best conserved in situ'*. That proponents can obtain clearing approvals by simply digging up threatened species and planting them elsewhere borders on the ludicrous **and is totally unacceptable**. It is difficult to separate the concept of a species being threatened or endangered from the fact that it is found in a particular biological setting to which it is most suited. The UBC strongly advocates the concept of protecting not only threatened or endangered species but also the habitat in which they naturally occur.

## Plant Communities

This paragraph found in the *draft plan* is significant:

*'The Swan Coastal Plain is altered to such an extent that much remnant vegetation is regionally significant and needs some level of protection (EPA 2006). Recommended additions of land to the conservation reserve system include areas that support vegetation types that are significant and not well represented in the existing planning area or in the conservation reserve system in general.'*

These observations are ones with which we concur. However, the "Desired Outcome" and "Objectives" just do not match the need for setting aside more remnant habitat.

The UBC strongly supports the protection of threatened plant species, floristic communities and vegetation types but this is not enough. Failure to address the big picture just leads to more species and communities appearing on the list. At some point very soon if not now the clearing of native vegetation in the Planning Area will have to be banned because anything else will be completely environmentally unsustainable. ***The UBC wants that cessation of clearing to occur now for Banksia woodlands*** and for other less threatened systems well before the whole system is in dire crisis. Notably the Banksia woodlands of the southern Swan Coastal Plain have been nominated for TEC listing under the EPBC Act, and this nomination is undergoing assessment this calendar year 2014.

Regrettably, neither DPAW nor any other land manager can say we are winning the war against dieback, or environmental weeds, or feral pest/predator animals, or climate change. The system is already under severe threat and the bulldozers are making things worse and much more difficult to retrieve.

## Native animals and habitats

The UBC supports the *draft plan's* assertion that "a primary aim for fauna management within the planning area is the expansion and protection of existing habitats and the rehabilitation of degraded areas."

However, the "Desired outcome," the "Objective," and the "Key Performance Indicators" are far too weak and ineffective and concentrate almost entirely on protecting threatened species from numerical decline. Once again, the UBC fully supports programmes to protect threatened species but also expects to see policies that will shore up existing populations of native animals that are not yet in dire straits as well. We have little doubt that numerous native bird species are in decline on the Swan Coastal Plain – particularly in metropolitan Perth and the fact that these species might be found elsewhere or that they might not yet be on their last legs is no excuse for ignoring their plight. Habitat loss is almost certainly the cause of these population declines and we believe not enough is being done to preserve the natural heritage of the city. The Perth region itself is a biodiversity hotspot *because it is under threat*. The DPAW draft management plan does not address this and must be substantially reviewed to be of any use against the severe threats.

We are aware of numerous instances where native animals such as Black-Gloved Wallabies and Southern Brown Bandicoots have simply had their habitat removed from around them to the point where populations can no longer survive. The diminution in the range and overall population of these species on the Coastal Plain is of concern to us but apparently not to DPaW. It is our view that if a proposed development is such that its implementation will destroy native mammal habitat on the Swan Coastal Plain then serious questions should arise as to whether that proposed development is environmentally acceptable. The glib references to ‘animal translocations’ that appear in development proposals don’t hide the fact that they are effectively proposing to subtract from an already relatively impoverished ecosystem when it comes to native mammals and their habitat on the Swan Coastal Plain. The *draft plan* should put equal emphasis on protecting existing habitat areas for native animal species that are not yet seriously threatened but will inevitably become so if their habitat is not subject to greater protection.

### **Invasive Plants and animal**

Lead environmental management agencies like DPaW should be carrying out research into weed control in natural systems and disseminating its findings to relevant land managers and community groups. Weeds are one of the toughest environmental management problems faced by land managers and community groups on the Swan Coastal Plain and any advances in technology or ideas on more effective strategies are keenly sought.

The control of feral animals and predatory domestic ones is generally undertaken in very large reserves and the UBC has no particular expertise in this area. It is remarkable that in these technologically advanced times, wherein such concepts as genetic engineering seem commonplace, we are still having to resort to old fashioned poison baits, traps and guns to control feral animals. It is to be hoped that more effective and more humane means of controlling feral animals will become available through further research. This issue is not addressed in the draft.

### **Disease**

The UBC is very concerned about the spread of *Phytophthora cinnamomi* and it is particularly alarmed at the lack of awareness many land managers appear to have of the risk it poses. Strict hygiene protocols should be in place for all susceptible reserves but clearly this is not the case. Plant pathologists are well aware how the disease can be spread and can provide appropriate advice to land managers but there has to be a will to implement them. Many local government reserves are run with very poor dieback hygiene practices in place and DPaW could set a strong standard in this regard.

DPaW should be contributing to and assisting research into controlling and managing this disease as it poses a threat not only to many key species of flora but the fauna species that depend on them as well.

### **Fire**

#### **Fire and biodiversity**

The UBC’s member groups are generally associated with small to medium sized reserves in the metropolitan area and **the major problem associated with fire is arson**. The UBC is firmly opposed to the practice of using controlled burns to reduce fuel loads on the Swan Coastal Plain. The problem is that our urban reserves are burnt far too often – nearly always by arson. The *draft plan* acknowledges that to control burn relatively small and isolated remnants would simply deprive any existing native fauna of refuge habitat and that is the case in all urban bush blocks. Fire on the SCP only introduces grassy weeds and degrades bushland condition in our fragmented landscape. It



is not uncommon for relatively small bush blocks in the metropolitan area to have multiple fires lit by arsonists every single year- indeed, it can be a rare year in which no such events occur. Simple observation of these repeated occurrences have lead our members to conclude frequent fires reduce the health of affected bushland, reduce its floral biodiversity, and increase weed problems. The UBC strongly disagrees with claims that controlled burning programmes do not affect biodiversity or vegetation and habitat quality – especially on the Swan Coastal Plain. The proliferation of weeds and the thinning of native vegetation in areas periodically burned – though not necessarily as part of a program – is very noticeable and if disturbance is already a problem the affect is all the more dramatic. The problem here is that most of the bushland on the Swan Coastal Plain exhibits some level of disturbance. There is a particular problem with grassy weeds and if there is a plant happier in circumstances of frequent fire than Veldt Grass we are not aware of it.

## Conclusion

The draft is unacceptable.

1. The UBC is of the view that the Conservation Commission and DPaW should review the draft Management Plan and develop clearer and more robust objectives when it comes to increasing the total area of securely conserved natural habitat in the Planning Area. This would have to involve the acquisition of land that currently has no reserve status.
2. Off reserve biodiversity conservation is essential and must be included.
3. The UBC strongly opposes the use of environmental “offsets” as a means of acquiring more land to be included in the conservation estate as it invariably comes at the cost of depriving some other area of vital habitat – in other words, there is invariably a net environmental loss. That is not a worthwhile practice.
4. The UBC is also of the view that DPAW should not focus so narrowly on species and communities that are under threat but that it should also be endeavouring to maintain and build populations of flora and fauna species that are relatively common and which should remain so.
5. The UBC recommends the *management plan* adopts a much more ambitious target when it comes to protecting and enhancing our natural environment. There is a sense in which the document is more defensive than pro-active in an environment where there are many threats requiring bold action.

Representatives of the Urban Bushland Council look forward to the opportunity of discussing these issues with you. Also, as stated, we recommend DPAW conducts a workshop process including input by community Friends groups and LGAs.

We may be contacted by phone on 9420 7207 (leave a message) or directly to me on 9271 5707 or by email to [ubc@bushlandperth.org.au](mailto:ubc@bushlandperth.org.au)

Yours faithfully

President  
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