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Dear Sir,

Re – Invitation for Public Comment

**Vegetation clearing for agricultural land use, Bullsbrook, Western Australia
(EPBC 2014/7120)**

Advertisement in *The West Australian* newspaper (11/8/2014) published pursuant to Section 95A (3) of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). ABN Developments Pty Ltd proposes to develop the land at Lots 1808, 1876, 2294 and 5889 Warbrook Road, Bullsbrook, Western Australia for agricultural purposes. The clearing will necessitate the clearing of 70.64 hectares of potential foraging habitat and 17 potential breeding trees for Black Cockatoos (EPBC 2014/7120)

The Urban Bushland Council presents the following comments regarding the abovementioned proposal to clear 70.64 hectares of native vegetation at Bullsbrook, Western Australia.

The Urban Bushland Council is a peak community body with over 60 member groups. The Council lobbies for the protection and appropriate environmental management of bushland areas in and around the Perth Metropolitan Area. The UBC participates in research and educational projects and has been active for about 20 years.

The UBC is dismayed to see yet another proposal to clear a large area of remnant bushland (70.64 hectares) on the Swan Coastal Plain portion of the Perth Metropolitan Area. It is our very strong view that clearing operations such as that proposed in this environmental assessment should be a thing of the distant past. The UBC rejects the use of “environmental offsetting” processes for the purposes of attempting to justify clearing operations that inevitably result in the net loss of substantial areas of habitat utilised by Endangered species such as Carnaby’s Black Cockatoo. The species is in

serious decline and we have seen no evidence to suggest that habitat loss is anything less than the greatest threat to its long term survival.

Our comments will follow the basic format of the Referral Document and use some of its specific headings where appropriate.

2. Detailed description of the proposed action

2.1 Description of the proposed action

The UBC notes that the Referral Document refers to 77.75 hectares of native vegetation that will “require clearing within five years.” This is a very substantial area as far as remnant native vegetation on the Swan Coastal Plain is concerned and we view this proposal with some consternation. We also note the statement that “the majority of the site contains previously disturbed remnant vegetation, and has been used for low level recreational activities, including horse riding and motorbikes.” There is little, if any, pristine native vegetation in the Perth Metropolitan Region and virtually all of the remaining native vegetation on the Swan Coastal Plain is “disturbed” to some degree. We are aware of very high conservation value remnant bushland areas around Perth that have been subject to all kinds of disturbance factors over extended periods, including horse riding and off-road vehicle use, so the observation that the bushland has been “previously disturbed” does not distinguish it from much of the bushland in existing conservation reserves around the city.

2.4 Context, planning framework and state/ local government requirements

It is stated in the Referral Document that the clearing is proposed for “agricultural pursuit (sic), including cropping and cattle grazing, and is therefore consistent with the local government planning requirements for the land.” The UBC has heard many claims from government officials over the past decade to the effect that clearing for agriculture is, for all intents and purposes, a thing of the past. So it is surprising to see such a proposal pertaining to an area not far from the outer urban fringes of Perth.

It is generally accepted that much of the agricultural region of the south west portion of the state has been excessively cleared of native vegetation and that this has contributed directly not only to massive impacts on natural habitat and biodiversity but also to serious salinity, drainage, and erosion problems for agriculture itself. Historically, we have made some serious environmental mistakes – largely through ignorance. Organizations such as ours like to think there has been some evolution and progress in our environmental awareness and in our legislative and regulatory framework regarding environmental protection. It is therefore somewhat bewildering to see seriously depleted and essential habitat for Endangered and Vulnerable species still being subject to clearing proposals of the scale anticipated in this assessment. Clearing for agriculture – though perhaps more directly in the Wheatbelt region – has been a disaster for Carnaby’s Black Cockatoo and the UBC would have hoped the government had formed the understanding that further clearing is just going to drive the species ever closer to extinction.

3.1 (3) Listed and threatened species and ecological communities

The UBC's interpretation of the Figures and descriptions in the Referral Document and its Appendices lead us to the conclusion that most of the areas subject to the clearing proposal is taken up by Banskia Woodland associated with the Bassendean Complex North vegetation complex. We would make the observation that interpreting the marked aerial images in the Referral Document is difficult on a computer screen with many subtle colour variations having particular significations in the associated keys. Furthermore, the use of a larger survey area (The North Ellenbrook Level 2 Flora and Vegetation Survey) within which the actual areas subject to the clearing proposal are subsets is somewhat confusing as the most pertinent areas are not clearly demarcated on every image. This use of a broader scale survey also risks diluting accuracy and clouding the issue as to whether species or communities may or may not occur within the critical areas subject to the assessment. If the assessment is informed by the presumption that species existing in the wider context may well exist in the areas directly impacted by the clearing proposal that is one thing but it is also open to the proponent to claim any particular habitat type is not represented in the assessment areas and therefore the presence of any prospective species or communities could be discounted. It would be far more preferable for the proponent to provide both a contextual broad scale survey and a more site-specific one to make the assessment process as well-informed as possible.

Ideally, the Commonwealth would have in place such an environmental protection regime that proposals of this nature would not proceed at all on the grounds that it would be clear to all that they would be exceedingly unlikely to gain environmental approval.

The Referral Document refers to three Listed species that "may possibly be or are likely to be significantly impacted by the proposed action." These species include Carnaby's Black Cockatoo, the Forest Red-tailed Black Cockatoo, and the Western Quoll.

Carnaby's Black Cockatoo

It has long been the UBC's position that breeding, foraging and roosting habitat for this species should not be cleared. It is an emblematic species in the south west of the state and it would be a national disgrace if it were to become extinct in the wild. The UBC is reliably informed that the latest broad scale population surveys are indicating a 15 percent decline in the population of this species over the past five years. That is very disturbing information but not surprising to anybody watching the species' progress – or lack of it – over the last 2 decades. Governments continue to grant approvals for the clearing of its habitat and these approvals are generally granted on the basis of nonsensical offset packages whereby some existing habitat simply changes tenure and the assessed habitat is destroyed. It is an unacceptable situation and we reject it completely.

Forest Red-tailed Back Black Cockatoo

This species is possibly in an even more precarious state than Carnaby's Black Cockatoo as it has moved into urban Perth over the past few years - thereby exhibiting a dramatic change in its normal range and in its feeding habits. What we do know is that this species feeds extensively on *Eucalyptus marginata* and *Eucalyptus todtiana* seeds in remnant bushland on the Coastal Plain, as well as on various other native species that occur in these remnants – such as *Allocasuarina fraserana* and *Corymbia calophylla*. It is only in the past few years that these Red-tailed Black Cockatoos have been commonly sighted around suburban Perth bush blocks and they may well be adapting their diet to native species not frequently encountered in their normal range. Why they have changed their habits is something of a mystery but it points to a species under some stress in its normal range moving to areas where it can more readily obtain food and water. They feed on the exotic Cape Lilac tree extensively but the fruits are only available for part of the year and they are now often observed feeding in suburban bushland remnants. It is possible that this species may even begin feeding on the *Banksia* species generally favoured by Carnaby's Black Cockatoo. The disruption to the normal patterns of movement and feeding observed in this species are disturbing and call for special conservation measures with regard to the protection of existing and potential habitat.

3.3 Remnant Native Vegetation

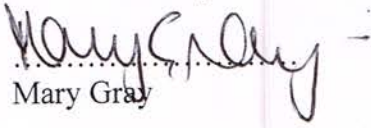
It is stated in the Referral Document that the “proposed clearing area is within the Swan Coastal Plain IBRA region and is represented by vegetation association 949 – “Bassendean,” which is characterised by low banksia woodlands.”

The matter of “banksia woodlands” is particularly significant. It has long been the position of the Urban Bushland Council that this broad vegetation type is in need of special protection. It is greatly threatened by Jarrah dieback, by on-going clearing, and by a wide range of disturbance factors. It also provides critical habitat for Endangered species such as Carnaby's Black Cockatoo. We are reliably informed that under the Perth and Peel Regions Strategic Assessment (under the EPBC Act) Banksia Woodland now effectively appears on the Federal Priority Assessment List. It is our understanding that it will probably be Listed as a TEC and probably as Endangered. In our view these designations are long overdue and it is our hope that these woodlands are on the verge of getting the protection they warrant. The proposed development of 70.64 hectares of vegetation largely constituted of this woodland would, in our view, be environmentally unacceptable.

Conclusion

The Urban Bushland Council is greatly frustrated in having to continually point out that the continued clearing of threatened native vegetation (in this case banksia woodland) which provides critical habitat for at least one species Listed as Endangered (Carnaby's Cockatoo) is environmentally unacceptable and will leave future Australians with an ecologically impoverished landscape. We strongly oppose any approval for this proposal.

Yours faithfully

 -
Mary Gray

President

Urban Bushland Council