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Dear Sir,

The Urban Bushland Council presents the following submission in response to the “Invitation for Public Comment” regarding the proposal:

**Residential Development on Lot 800, Youle-Dean Road, Brabham Western Australia
EPBC 2015/7458**

The Urban Bushland Council (UBC) is a peak community conservation body with over 70 member groups. The UBC is primarily an advocate for the protection and appropriate environmental management of bushland remnants in and around the Perth Metropolitan Area. The PMA occupies a very large area and much of that area is located on the Swan Coastal Plain. The Swan Coastal Plain is an area of international significance in terms of its biodiversity and the UBC is alarmed at the continuing destruction of native flora and fauna habitat that is occurring in the Perth region. Our members treasure our natural heritage and we are very conscious of the fact that the ecological viability of the Swan Coastal Plain, in particular, is under serious threat from numerous threatening processes – not the least of which is land clearing for urban development.

Acquisition of Bush Forever Site 200

The Urban Bushland Council was a major community driver of the Bush Forever initiative and we deplore the fact that it is not yet fully implemented and protecting the invaluable natural heritage that was identified in this plan in perpetuity. The UBC welcomes the acquisition of Bush Forever Site 200 and insists it must now be made permanently secure as an A class nature conservation reserve. The large size of Bush Forever Site 200 (140 hectares) and its extensive areas of Black Cockatoo habitat (estimated at 89 hectares *Referral* p.27) make it an essential acquisition both for the Endangered species aspects and for its broader natural heritage values.

UBC Opposed to use of Environmental Offsets to mask net Environmental Loss

Something the UBC finds objectionable, however, is the use of Bush Forever sites as environmental offsets. Notwithstanding the negotiations between the WA Housing Authority and the Commonwealth over the purchase of the greater site (that being the area proposed for housing development and that proposed for conservation), the UBC has a view on the matter of environmental offsets. It is a fact that the council insists that Bush Forever sites should become part of the conservation estate. However, while the UBC does not doubt that Bush

Forever sites are environmentally significant, it does not accept any proposition that bushland areas not included in Bush Forever are therefore not environmentally significant. In the preparation of Bush Forever, the WA government, with assistance from WA planning and environmental bureaucrats, and scientists, insisted on drawing a distinction between “locally” and “regionally” significant bushland when considering sites for formal inclusion. It is a distinction that the UBC never accepted. The UBC took the view that it was both scientifically invalid and practically undesirable as it would lead to many suburbs losing what little they had in the way of natural remnants. This has proven to be the case and now, as just one consequence, it is very difficult to obtain good supplies of provenance seed for regeneration work in many areas around Perth. Many areas have lost their last small bushland remnants since Bush Forever was released. So not only has Bush Forever – despite not having been fully implemented - been used as a mechanism for “clearing down,” but it has the other feature of having avoided a great deal of bushland that was clearly environmentally significant but which happened to be on private land. Bush Forever provides a minimal framework for conservation but sacrificing other bushland – which can be in as good a state of preservation or which may have other important environmental attributes - to secure its future is something the UBC finds highly objectionable. **The outcome is always a net loss of bushland and biodiversity.**

Thus the UBC does not support the environmental offsets system employed by the WA Government – or the Commonwealth – and sees it as nothing more than a means of providing a bogus justification for allowing the progressive erosion of our natural heritage.

The UBC has no detailed knowledge of the history of the RAAF base at Caversham but in the view of the UBC it would not be unreasonable to expect the Commonwealth to set aside good quality native vegetation such as that found on this historic base for conservation purposes and to have it transferred at minimal cost to the State Government. Some military-purposes land was simply resumed by the Commonwealth during World War II and no compensation went to the owners. This may not be the case in this instance but if it were, it would lend weight to the argument that it would not be unreasonable for the Commonwealth to give something back to the community in light of its “windfall” gain. If the purchase price for the land was in fact reduced on the understanding that reserved land was likely to have reduced market value, then claiming offset credits for the land would not seem particularly meritorious.

In any case, the environmental assessment system is deeply flawed with its almost exclusive emphasis on species and communities under serious threat. The UBC is all in favour of protecting threatened species and their habitat but why was a species like Carnaby’s Black Cockatoo allowed to become endangered in the first place? If land clearing restrictions had been in place a lot earlier, the species would probably not be in the dire situation it is in today: – heading for extinction within the next 20 years. Our environmental protection system is about calling the ambulance at the last minute rather than preventing the calamity in the first place and our natural heritage will become even more beleaguered until there is a change of approach.

Plight of Black Cockatoo species

The WA Housing Authority’s proposal to develop Lot 800 Youle-Dean Road, Brabham for residential development represents another impact on our natural heritage and endangered Black Cockatoos which the UBC regards as significant and unacceptable. The key species

identified as being affected by the proposal, the Endangered Carnaby's Black Cockatoo, and the Vulnerable Forest Red-Tailed Black Cockatoo, are of special concern to the UBC and the council has expressed its views regarding the decline of Carnaby's Black Cockatoo – in particular - in many forums and to a great many politicians and government officials over many years. All the evidence points to the Endangered Carnaby's Cockatoo being in serious and on-going decline, with extinction likely within 20 years unless habitat destruction ends now. The Vulnerable Forest Red-tailed Black Cockatoo is of worrying and uncertain status in the field however it may be classified by Commonwealth authorities. Its status deserves to be raised to endangered or even critically endangered.

Forest Red-tailed Black Cockatoo

The Forest Red-tailed Black Cockatoo is exhibiting strange changes in its range. It has gone from being a bird seldom seen on the Swan Coastal Plain around suburban Perth to being a very familiar sight in this area in less than a decade. As its name would suggest, the Forest Red-tailed Cockatoo is normally seen in the forests of the south west and its arrival in the built-up areas of Perth is concerning. The species is particularly drawn to the seeds of the exotic Cape Lilac tree (*Melia azedarach*) in suburban gardens but this is not likely to be the sole explanation for its departures from its normal range. It feeds quite extensively in suburban bushland remnants as well, though it is more interested in the seeds of larger Eucalypts and Casuarinas than Carnaby's Cockatoo. There would appear to be a great many large trees on Lot 800 that would provide feeding habitat for the Forest Red-tailed Black Cockatoo and their loss would be significant.

The *Referral* states that:

'Forest Red-tailed Black Cockatoos may visit the site and have been recorded in Whiteman Park (Attachment 8) however, Brabham is at the limit of this species range and is not likely to rely on the area for survival. Therefore it is considered highly unlikely for the proposed development in the Referral Area would significantly impact on this species.' (Attachment 8) (Referral p.12).

We disagree with this statement as it has no basis for the conclusion reached. This species is now a frequent visitor to many bushland sites around Perth and the many large Jarrah and Marri trees identified in the *Referral* in reference to breeding potential for Carnaby's Black Cockatoo, for example, would not provide good feeding habitat for the Forest Red-tailed Black Cockatoo. It is not clear why the Forest Red-tailed Black Cockatoo has become a much more frequent visitor to suburban Perth in recent years, but it is not impossible that it is because of continuing losses in its natural habitat. If this is the case, it is imperative that the habitat areas they are moving to are not being themselves reduced. Local Government Authorities do not plant local habitat trees such as Marri, Jarrah and the larger blocks where they commonly grew are disappearing with increasing urban infill. In other words, there is no real long term reliability in the supply of the planted suburban foraging trees these birds seek out. They do invariably visit large Eucalypts and Casuarinas in suburban bushland remnants and wherever else they may occur. It is the UBC's view that *all Eucalypt and proteaceous bushland remnants* around Perth should be regarded as significant foraging habitat for the Forest Red-tailed Black Cockatoo.

Carnaby's Black Cockatoo

The loss of 29.02 ha of foraging habitat made up of Marri, Jarrah and Banksia trees is a very significant impact as is the loss of 124 potential breeding trees (*Referral p.14*). It is the UBC's view that this proposal should involve the protection of more than 9.17ha of foraging habitat within a Conservation Area of Public Open Space and it is also our view that more than 39 potential breeding trees should be conserved within POS.

The *Referral* states that "seven Bush Forever sites occur within 5km of the site with a total area of 2516ha" (P.16). The proximity of other reserves does not reduce the impact of the loss of the 29 hectares of Black Cockatoo habitat – a net loss. It is still habitat that will not be available when drought or major bush fires are placing pressure on food resources and the argument that there are other reserves in the vicinity and therefore the birds can use them instead is nonsense as there remains a net loss of feeding habitat.

Thirty years ago it was not uncommon to see very large flocks of Carnaby's Black Cockatoos moving around metropolitan Perth – probably because the birds could move from one substantial feeding area to another. Now the bushland is much reduced and more fragmented and, as an apparent consequence, the birds move about in smaller flocks. This is doubtless related to a **reduction in the overall numbers** but it is also likely be because the bushland remnants have become **fewer and smaller** throughout the city. Smaller remnants can only stand a few visits by large flocks to have their resources significantly reduced. Some of the larger remnant feeding areas, such as those at Perth and Jandakot airports, have been dramatically reduced due to the Commonwealth's indifference to this species' plummeting numbers, and the UBC can only reiterate the point it has made in any number of EPBC Act submissions that **the habitat clearing has to stop**. It is the height of irresponsibility to be pointing to the creation of new reserved areas to justify clearing when there is a habitat deficit to begin with. Offset practices may have made sense many years ago – before the species was seen to be declining badly – but now it is too late and they are little more than environmental fraud. When and if the region's biodiversity and Carnaby's Cockatoo numbers are seen to be improving – from the very low base evident today relative to the historical situation – then the Commonwealth and State authorities can claim to have some credibility in having pursued, and in continuing to pursue, land clearing with offset practices. ***They are not an environmental solution. They are significant part of the problem.***

Measures to avoid or reduce impacts (*Referral p.26*)

It is stated that in the *Referral* that "additional foraging habitat" will be created in the area to be developed:

'Landscaping in the development areas and the median island locations and landscaped areas will be planted with species specifically known to be foraging species for Black Cockatoos' (p.26).

There would be some merit in planting species – presumably native species – that could provide food resources for Carnaby's Cockatoo. But these plantings would not be mature enough to provide foraging habitat for some 20 years, so there really should be a delay of 20 years to allow habitat replacement before clearing. Such proposals are rather vague and will probably never be followed up by the Commonwealth. It would a positive step if the proponent were to arrange for the extensive planting of indigenous foraging species in

landscaping works - but it is so seldom seen. Carnaby's Cockatoo is often hit by motor vehicles so planting foraging species on median islands or beside main roads is not wise.

In Attachment 7 *Carnaby's Black Cockatoo Assessment – Caversham Airbase, Henley Brook (ATA)*, the following statement appears:

'The Appeals Committee (2004) in its report to the WA Minister for the Environment noted the EPA had acknowledged that Black Cockatoos have learnt to adapt to exotic plant species as a result of clearing of native vegetation and is now utilising exotic trees in parks and gardens. It is therefore considered that this species is not dependent for its survival on small bushland remnants as a food source (Appeals Committee, 2004) (p.6).

If the *Referral* is informed by such nonsense, it is no wonder it makes light of the loss of 29 hectares of foraging habitat for Carnaby's Black Cockatoo. Carnaby's Black Cockatoo does feed on exotic species and this has been known for a very long time. But strangely, the expansion of Perth's suburbs – with all their parks and gardens and with all their exotic trees – has not prevented the appalling decline in Black Cockatoo numbers over the past few decades. How could this be so? Well probably because Carnaby's Black Cockatoo is heavily dependent on naturally occurring food resources in native vegetation – and the area of native vegetation is steadily being reduced by clearing. From our observation virtually every bushland remnant in Perth containing banksias will be visited by Carnaby's Cockatoo at least several times per year for foraging purposes. Sometimes the resources seem meagre but the blocks will still be utilised. It all points to their being insufficient natural foraging habitat available in the metropolitan area for the species and to suggest opportunistic feeding in suburban gardens obviates the need to protect smaller bushland remnants is utter nonsense. By the same reasoning bears wouldn't need forests because they can feed from rubbish bins.

Conclusion

1. The UBC welcomes the retention and protection of Bush Forever site 200.
2. The council insists that the Bush Forever site should be given permanently secure conservation status as an A class nature reserve without further delay.
3. The proposal for the development of Lot 800 involves the clearing of 29 hectares of valuable Black Cockatoo habitat and this is a significant impact for the Endangered Carnaby's Cockatoo – a species which already appears to be under habitat deficit stress. The UBC does not accept that environmental offsets genuinely compensate for habitat loss. We take the very strong view that all clearing of Black Cockatoo habitat should be banned unless or until the species can be proven to be recovering.

The UBC appreciates the opportunity to provide comments.

Yours faithfully

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