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City of Gosnells
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To whom it may concern:

**Garden Street road extension Huntingdale: EPBC Act reference 2016/7735
Controlled Action: Preliminary Documentation level of assessment
Submission by the Urban Bushland Council WA Inc.**

The Urban Bushland Council WA Inc. is an association of more than 75 community groups which have a common interest in the conservation and management of urban bushland in WA. Most are friends groups, and others are larger groups such as the Wildflower Society and the WA Naturalists' Club. One of our members in Gosnells is the prominent group SERCUL.

The Urban Bushland Council (UBC) does not support the Garden Street road extension proposal in any form and believes that it cannot be made environmentally acceptable as it will have multiple significant impacts on many MNES and on State listed endangered flora and fauna species and on Threatened Ecological Communities. It is also contrary to State Bush Forever policy. The failure to recognise the very significant impacts on the federal critically endangered ecological community: 'Claypans of the Swan Coastal Plain' is a fatal flaw in the assessment documents. Details of these matters are below.

We draw to your attention the lack of maps and lack of access to 3 technical assessment documents until 20th February, the day public comment period closed. This last minute access and extension for comment until 22 February is much appreciated.

The road proposal involves the clearing of approximately 4.58ha of native vegetation of very high conservation value. This includes the likely significant impact on nine Matters of National Environmental Significance (MNES). These MNES are:

1. The endangered King Spider orchid: *Caladenia huegelii*. This rare orchid species is an iconic species for the Perth region and its habitat should not be cleared or disturbed.
2. The endangered Purdie's donkey orchid *Diuris purdii*.
3. The Bee orchid *Diuris micrantha*.
4. The endangered Glossy-leafed Hammer orchid *Drakea elastica*.
5. The vulnerable Dwarf Hammer orchid *Drakea micrantha*
6. The endangered Beaked Lepidosperma *Lepidosperma rostratum*
7. Foraging habitat for the endangered Australasian Bittern *Botaurus poiciloptilus*
8. Foraging habitat for the endangered Carnaby's Cockatoo *Calyptorhynchus latirostris*.
9. The critically endangered ecological community: Claypans of the Swan Coastal Plain.

Orchids: This is an extraordinarily high number of potential MNES in the one area. Indeed the area is known for its outstanding species richness of orchids, many of which are now endangered. Because orchids of a particular species do not necessarily appear each year, a one year survey is not adequate to determine the orchid species present. Some orchids only appear occasionally, so reliable survey for their presence requires many years of data collection. Thus the data presented is not adequate and it must be assumed that all the above species are present. Further botanical information by Tauss and Associates Biodiversity Consultants (TABC) concerning orchids is given in the Appendix attached.

CLAYPANS OF THE SWAN COASTAL PLAIN TEC

Notably the Claypans of the Swan Coastal Plain TEC (under EPBC Act) was not included by the consultant and this is a major omission.

Under the EPBC Act, there are 4 critically endangered ecological communities on the Swan Coastal Plain in clay pans and on clay flats. Analysis of the flora data needs to be completed so that the identity of the floristic community is defined in the site proposed for clearing.

The vegetation map provided by the City shows the complexity of vegetation types on the Garden Street road reserve. The report by Tauss and Associates Biodiversity Consultants (TABC) shows errors and omissions in the flora report by the City's consultants and we draw your attention to this work and report. The analysis, field survey and map provided by TABC shows the presence of a significant patch of *Melaleuca viminea* – *Astartea assimilis* dense heath to scrub which is identified as **Claypans of the Swan Coastal Plain TEC - which is listed as critically endangered under the EPBC Act.**

We submit that disturbance and clearing of this TEC will reduce the size of this ecological community not just in the road reserve but also in the adjacent Bush Forever Area as roadworks will alter the surface and shallow groundwater hydrology. The stratigraphy in this area is very complex and as a result any disturbance to the surface and shallow groundwater by roadworks will have significant hydrological impacts which will adversely affect habitat critical to the survival of the ecological community.

These changes to the hydrology will affect the composition of the surrounding Groundwater Dependent Ecosystems which are floristically very complex. Thus significant unacceptable impacts will occur in the surrounding Bush Forever Area 125.

State listing: The claypan ecological community includes 7 different Floristic Community Types recognised by the State government. There has been no analysis of the species recorded by the City's consultants to determine the floristic types present on the site proposed for clearing. We draw your attention to the report by TABC which gives more detail of the flora present and analysis of floristic community types.

In summary, the disturbance and net loss of the critically endangered Claypan community is significant and is unacceptable and thus should not be permitted. This is reason alone for the proposal to be refused under the EPBC Act.

Fragmentation of Bush Forever Area 125

Planting of the proposed road verge will not replace the highly complex natural ecosystems cleared.

Fragmentation of the conservation area Bush Forever site 125 will result in significantly reduced and changed ecological functioning.

Conservation Category Wetlands

Much of the proposed road traverses areas mapped as Conservation Category Wetlands which are supposed to be protected by government. The City of Gosnells should respect this by formally removing the road reserve and focussing on conservation management and maintenance of the outstanding values of these CCWs. These are irreplaceable public assets.

Dieback spread inevitable

The Phytophthora Dieback Assessment by Glevan Consulting indicates that dieback is present in parts of the area. Banksia woodlands and proteaceous species are highly susceptible to dieback. It is inevitable that construction, stormwater runoff and operation (ie traffic flow) of the road will spread dieback which will result in death of susceptible vegetation. This is a very significant impact which cannot be prevented over time. It will in time result in unacceptable deaths and impacts on the surrounding vegetation in Bush Forever Area 125. The proposed minimisation by construction over summer cannot guarantee absence of summer rain and the risk of dieback spread will remain after construction with traffic flow and surface runoff. Thus spread of dieback cannot be avoided.

This significant impact of degradation of the surrounding vegetation in Bush Forever 125 by Phytophthora dieback is reason alone for the proposal to be rejected under the EPBC Act.

Invasive species

Disturbance by the road will facilitate invasion of weeds into the surrounding conservation area. Also pollutants from traffic (oil, petrol etc) and rubbish dumping and litter will inevitably increase. These are unacceptable impacts for a sensitive wetland conservation area.

Carnaby's Cockatoo: This iconic species is in rapid population decline in the Perth region. According to the federally approved Recovery Plan for this species, there should not be further loss of habitat. Any replacement habitat would take at least 20 years to grow and produce food. Thus clearing without waiting for this period, after successful replanting, results in a net loss of habitat. The population of Carnaby's Cockatoo is in unacceptable rapid decline because of this net loss of habitat, patch by patch. It is now essential that further clearing is declared environmentally unacceptable for Carnaby's in all small patches, so that 'the classic death of a thousand cuts' is avoided, and cumulative impacts of loss of habitat are stopped.

Banksia Woodlands TEC listing

Although this proposal pre-dates the September 2016 listing of Banksia woodlands of the Swan Coastal Plain as a TEC at the level of 'endangered' under the EPBC Act, the public notice above seeking comments is well after the listing. The Conservation Advice to meet objectives for conservation is to protect the ecological community to prevent its further loss. This means that sites and their buffer zones such as the road reserve in Bush Forever 125 should not be cleared. The City of Gosnells should respect this status and withdraw the road proposal.

CLEARING

Contravenes Bush Forever policy for eastern side of the Swan Coastal Plain

Under Bush Forever policy, there is a general presumption against clearing on the eastern side of

the Swan Coastal Plain (see Bush Forever Volume 1 (December 2000): Policies Principles and Processes, page xiv: Policy Measures for Implementation:

‘There will be a general presumption against clearing bushland containing threatened ecological communities or representation of vegetation complexes of which less than 10% currently remains on the Swan Coastal Plain portion of the Perth Metropolitan Region (generally involving vegetation complexes of the eastern side of the Swan Coastal Plain – refer Map 1 and 2).’

The Garden Road extension is proposed through intact, high quality vegetation of the eastern side of the Swan Coastal Plain and based on this State government policy alone, the City of Gosnells should not be considering any clearing. Therefore the proposal should be rejected and all applicable road reserves should be removed from Council and State plans.

The City’s consultant’s claims that there is similar vegetation remaining in the adjacent Bush Forever site 125, and that therefore clearing a small part of it is acceptable, is not a logical argument. Indeed it is nonsense. Bush Forever Areas are for conservation in a ‘CAR’ reserve system and the road reserve should have been removed from site 125 many years ago as part of Bush Forever implementation.

Notably also the road proposed through the similarly high conservation value Anstey-Keane Damplands was refused by the state Minister for the Environment on advice from the EPA. The City of Gosnells should therefore recognise the unacceptable risks to Bush Forever Area 125, as well as the presence of so many MNES that should be protected by avoidance of all the impacts. This means the Garden Street road extension should never be built and the road reserve should be removed from all plans.

Incremental loss: It is notable that clearing in the last 10 - 20 years has resulted in loss of vegetation patch by patch so that the extent remaining now in the local region is much less than that shown on Bush Forever maps of December 2000. This makes conservation of identified Bush Forever Areas and the need to remove all road and other reserves for infrastructure a priority. Clearing has increased the impacts of fragmentation. Also the percentage of vegetation complexes remaining and secured for conservation in this area is still well below the minimum 10% target introduced with Bush Forever. These were supposed to be finalised and secured by the year 2010 under Bush Forever. Thus the City of Gosnells should help facilitate, as a priority, the securing of the whole of site 125 together with all other Bush Forever sites in the municipality. This is especially important given the outstanding species richness and vegetation complexity like nowhere else.

Bush Forever Area 125 is an outstanding natural asset, rich in species, with its own suite of unique conservation values. It is a treasure for the City of Gosnells and its residents and visitors to be enjoyed and nurtured.

CONCLUSION

The Urban Bushland Council recommends that under the EPBC Act, the Garden Street road extension be declared environmentally unacceptable due to significant irreversible impacts on so many MNES:

1. Loss of areas with multiple listed rare orchid species

- 2. Significant loss of the critically endangered Claypans of the Swan Coastal Plain ecological community**
- 3. Habitat loss for the increasingly endangered Carnaby's Black Cockatoo being inconsistent with the federally accepted Recovery Plan for this species**
- 4. Hydrological impacts on the surrounding high conservation value vegetation complexes (in Bush Forever site 125), including Groundwater Dependent Ecosystems**
- 5. Habitat loss for the endangered Australasian Bittern**
- 6. Loss of high quality endangered Banksia woodlands of the Swan Coastal Plain ecological community**
- 7. The inevitable risk of spread of Dieback disease and consequent degradation and loss of high quality vegetation surrounding the road reserve**
- 8. The inevitable degradation of surrounding vegetation by weed invasion.**

The Urban Bushland Council is surprised and deeply concerned that the EPA did not formally assess this proposal and recommend that it not be approved because of the significant environmental impacts as above. This would have been in line with their assessment and recommendations against approval of a similar road project proposed by the City of Armadale across the Anstey-Keane Damplands. The Minister for the Environment accepted the EPA's advice and declared that the road cannot go ahead.

Appendix

Please note also that we bring to your attention and commend the Report by Tauss and Associates Biodiversity Consultants (TABC) concerning detailed scientific information and advice pertaining to the Garden Street road extension proposal. This report is an Appendix to this submission and will be forwarded to you Wednesday 22 February.

We are available for further discussion on our submission by contacting the UBC at ubc@bushlandperth.org.au or by phone to our office 9420 7207.

Yours sincerely

President
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