

7 October 2013

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Invitation for public comment on Referral
2013/7008 Shire of Kalamunda WA Hartfield Park Sporting field Extension.
Due 8 October 2013.

The Urban bushland Council WA Inc, thanks the Department for the opportunity to comment on this proposal.

1.) Bush Forever/Perth and Peel Strategic Assessment

Hartfield Park Bushland is Bush Forever site 320. The UBC strongly supports the proposal that every Bush Forever site be protected through the Strategic Assessment process. As this process is still being worked on, the UBC considers it inappropriate that part of Bush forever site 320 be cleared.

As an implementation plan and whole-of-government initiative, Bush Forever was designed to identify, protect and manage regionally significant bushland in order to achieve a sustainable balance between conservation and development in metropolitan Perth. (The Hon John Day, MLA, Minister for Planning. Official opening of Perth's Bush Forever Report Card Conference, 7 December 2012, p1)

So the balance was that regionally significant bushland areas be protected and managed (along with their linkages) and development be considered outside the Bush Forever areas. Minister Day added in his opening address that:

Bush Forever has resulted in the conservation of hundreds of public and privately owned bushland sites across the metropolitan region, resulting in the preservation of biodiversity, native species habit[at] and local amenity.

Minister Day concluded that the state government *remains committed to ongoing conservation, not only through the Bush Forever program, but also through the development of new initiatives, such as the Perth and Peel Strategic Assessment.*

Despite the Minister's comments the UBC finds that developments continue to be put forward in Bush Forever sites. This proposal is another one.

The recommendation in Bush Forever, volume 2 for Hartfield Park Bushland, Section 5 is:

*Site with some existing Protection; the existing care, control and management intent of the reserve is endorsed. **The purpose of the reserve should be amended to include conservation and appropriate mechanisms applied in consultation with the management body.** (Our emphasis)*

Inadequacy of the MRS to protect Bush Forever Areas

Bush Forever areas have been identified as regionally significant remnant vegetation on the highly biodiverse Swan Coastal Plain area. Unfortunately despite the original and government accepted intention of the Bush Forever program to identify, conserve and protect these areas from future development, a number of Bush Forever sites are being subject to inappropriate development proposals, such as clearing part of Bush Forever site 320 at Hartfield Park, in these Bush Forever areas of native vegetation. Further the Parks and Recreation zoning under the MRS does not provide adequate protection for Bush Forever Areas where expansion of active recreation facilities is proposed.

The long-awaited MRS text amendment that should have defined these areas as environmentally significant areas to be managed for the purpose of conservation, was released for public comment in 2012. Unfortunately the proposed amendment was flawed in that it did not state this purpose of nature conservation for all sites, nor a management obligation. So we have only "Parks and Recreation" zoning on only some of the Bush Forever areas, and 'Special Control Areas' were not placed over all Bush Forever Areas as originally planned.

The MRS needs to be amended as a matter of urgency to designate these Bush Forever areas as conservation zones to be managed for the protection and conservation of their environmental values.

Remnant Vegetation

There is little weight in the referral (Section 3.3 e, below) regarding the significance of remnant vegetation and the "Southern River Vegetation Complex" is dismissed as "Degraded" to "Completely Degraded". It is only in Section 3.3 (j) (below) that reference is made to the site being listed as Bush Forever Site 320, a listing that is given to areas of regionally significant bushland to be set aside for the purpose of nature conservation.

The Referral does not mention that the Southern River Vegetation Complex is "both regionally and locally rare" (Poison Gully West Offset Proposal, Section 5.2).

Further, to downplay the significance of this Bush Forever site due to degradation by weed infestation is an indictment on the managing authority of the site which is responsible for weed management within that area. Weed control and other conservation works should be undertaken as required. "Demolition by neglect" occurs when developers demolish heritage buildings that have been left to fall into disrepair, this unacceptable situation is analogous to allowing a Bush Forever site to degrade due to lack of conservation management.

3.3 (e) Remnant native vegetation

The remnant vegetation of the project area is mapped as Southern River Vegetation Complex. It consists of open Marri Jarrah woodland. The remnant vegetation of the area in which the action is proposed to take place is isolated and has been identified as 'Degraded' to 'Completely Degraded' (Strategen, 2012 & Bennett, 2009).

3.3 (j) Other important or unique values of the environment

Describe any other key features of the environment affected by, or in proximity to the proposed action (for example, any national parks, conservation reserves, wetlands of national significance etc).

The entirety of Hartfield Park is listed as Bush Forever site 320, this site includes the area in which the action is proposed to take place.

2.) Offsetting

The UBC notes again that the proposed clearing of the bushland areas for the sports fields will result in a net loss. Offsetting will not compensate for this loss.

Offset Proposed Already a protected area

The Poison Gully offset area is currently identified as an important environmental area that is protected from clearing and development by a range of controls as listed in the Poison Gully West Offset Proposal (extract below). Thus it is already a reserve and does not qualify as an offset.

Under this incorrect logic, Kings Park could be offered as an offset area. This is totally unacceptable and must be changed.

The net loss of regionally significant remnant bushland and foraging habitat for Carnaby's cockatoos is very alarming and this continuing trend of clearing these areas will eventually lead to the extinction of this species and extreme pressure on a range of other species that rely on these areas and the ecological linkages through the landscape they provide.

Poison Gully is an important creekline in the Shire and has many valuable attributes, which have been listed below:

- Poison Gully is currently listed as crown land and includes Reserve numbers 40228 and 36492
- It is Bush Forever site number 45
- It is categorised as a Resource Enhancement Wetland
- It is an Aboriginal Heritage Site
- It is in an Environmentally Sensitive Area (ESA)
- The Vegetation is part of the Swan Coastal Plain (SCP), known as Open Woodlands of Southern River Vegetation
- Contains a population of the Declared Rare Flora *Conospermum undulatum*
- It is feeding habitat for the Threatened species *Calyptorhynchus banksii* (Red Tailed Black Cockatoo) and Endangered species *Calyptorhynchus latirostris* (Carnaby's Black Cockatoo).

Above: Poison Gully West Offset Proposal, page 2.

Offset not listed on Offset Register

The Clearing Permit lodged with the referral lists an approved offset at High Wycombe which is not listed on the Western Australian governments Offsets Register (search terms used on 7 October 2013 9.30 am: CPS 4100/1, Shire of Kalamunda, Hartfield).
<http://www.offsetsregister.wa.gov.au/public/searchregister/>

PERMIT TO CLEAR NATIVE VEGETATION UNDER THE ENVIRONMENTAL PROTECTION ACT 1986

I refer to your application to clear 1.88 hectares of native vegetation on Lot 3000 on Deposited Plan 44636 (Hartfield Park, Reserve 17098), Kalamunda, for the purpose of constructing a sporting field (reference CPS 4100/1).

Thank you for supplying information on the water allocation for Hartfield Park, the need for the proposed clearing and your final offset proposal sent via email on 20 June 2012.

I have reviewed your offset proposal to undertake weed control and revegetation within 4.04 hectares of Crown Reserve 40228 and 36492, High Wycombe and advise that it has been approved.

Above: From Clearing Permit and Conditions.

3.) Recreational demands v habitat for species of National Environmental Significance

In the Minister for the Environment's appeal determination on the granting of a clearing permit, the Minister was advised that recreational demands in the Shire of Kalamunda mean that all areas identified as possible alternative sites to the current proposal [may need to be made available for sporting arenas.] The UBC maintains that demands for habitat for species of national environmental significance, as well as 'common' species, needs to be available for those species.

4.) Water Requirements

In "Appendix 4 Consultation Document" Section 2 Shire Staff have stated "There is limited ground water supply. Additional water supply would be required for any additional reticulated turf area as the current bore licence is being used to capacity".

There is no information regarding the provision of additional water required to reticulate the five new soccer pitches. Given that the current ground water extraction licence is being fully utilised any further ground water licences will need to be granted, however what will the impact of further abstraction be on the surrounding Bush Forever vegetation that is not proposed to be cleared, such as the area behind the DRHPC and Scouts area (Hartfield Park Master Plan, page 32 below). This bushland area contains declared rare flora and is "in very good condition and should be considered worthy of conservation".

Further impact assessment is required to determine what effect the proposal will have on the adjacent areas of declared rare flora.

Water Supply

Any significant increase in irrigated turf area will require additional water supply. The current ground water licence for Hartfield Park is fully allocated.

Should the Shire decide to increase the amount of irrigated turf there will be a need to identify a new source of water for Hartfield Park that is sustainable in the long term, cost effective and is practical to implement.

Above: From
Appendix 4
Consultation
Document.

Above: from the Hartfield Park Sport and Recreation Facilities Master Plan (August 2010).

5.) Matters of National Environmental Significance and ecological linkages

The project location Figure 1 Strategen document shows that the location is a linkage between the Perth hills and green areas to the north west and south west.

Tingay has the linkages to the south and west and the area is part of Greenways 101, 102, 98. The area is 'a part of a regionally significant fragmented bushland/wetland linkage.' (Bush Forever Hartfield Park)

Julie Raines of Australian Ecological Services for Strategen advised that fragmentation of areas to the Darling Scarp, the System 6 wetlands and the airport should be avoided.

These linkages are critically important for nationally listed bird species such as Carnaby's cockatoo and Forest red-tailed black-cockatoo. These birds, as well as smaller birds move over the landscape using the linkages.

6.) Carnaby's cockatoo and Forest red-tailed black-cockatoo

Objective of the DEWHA in regards to black cockatoos

At a seminar in Perth, 20 August 2010, Dr Andrew Weavers, DEWHA, said: *The objective of the DEWAH is to support the persistence and recovery [of black cockatoos]. I am not confident that what we are doing will achieve that.*

Forest Red-tailed black-cockatoo

This species is listed as vulnerable under the EPBC Act. Ron Johnstone, Director of Ornithology, WA Museum, has stated that the forest red-tailed black-cockatoo is even more endangered than Carnaby's cockatoo and its status should be updated to endangered. (Talk given at UBC AGM 2012). The distribution of the red-tailed black cockatoo is in a state of flux, with its distribution contracting from its former range and with birds coming onto the Swan Coastal Plain and staying there. As an example red-tailed black-cockatoos were present on the Murdoch University campus for the whole of 2010. It is important to learn about the large-scale movement patterns of black cockatoos as they change and their habitat requirements. The cumulative effect of loss of habitat is not being considered in the state of Western Australia.

Carnaby's cockatoo

This species is listed as endangered under the EPBC Act and the Great Cocky Counts confirm that numbers continue to decline. Phil Digney, General Manager of Kaarikin Black Cockatoo Conservation Centre has stated that there will be a population crash of Carnaby's cockatoo after the older birds die, as the population is aging. (Greens Walk, Shenton Bushland 24 August 2013)

Both Carnaby's cockatoo and forest red-tailed black-cockatoo use the area and the potential loss of feeding trees for the sports grounds contribute to the losses we see all over the Swan Coastal Plain for development.

Black cockatoos are not ours to put at risk by removing trees and bushland.

I may be contacted at home on (08) 9271 5707

Yours sincerely,

President UBC

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