



24 November 2013

epbc.referrals@environment.gov.au

Referral Business Entry Point, EIA Policy Section (EPBC Act)
Approvals and Wildlife Division
Department of the Environment,
GPO Box 787
Canberra ACT 2601

**EPBC Act referral 2013/7050: Lot 9000 Bottlebrush Drive Kiara WA: housing, open space and primary school proposal by WA Housing Authority
Submission by the Urban Bushland Council WA Inc.**

Dear Sir/Madam

The Urban Bushland Council WA Inc has had a long interest in the above site known as the Kiara TAFE site. We hold that this site must be fully protected and added to Bush Forever because of the significance of its flora; representation of the Bassendean Vegetation Complex Central and South (Hedde complex); and because of its importance to Matters of National Environmental Significance, namely Carnaby's Cockatoo and the Forest Red-tailed Black Cockatoo.

We note that the reports by the consultants for the WA Housing Authority as shown on your website significantly understate or ignore the values of the Kiara site. There is no mention of the Bassendean Central and South vegetation complex. Also there is no reference to the history of community interest and knowledge in the site, and no mention of the history of WA MRS Planning Amendments (to rezone and allow development) which were rejected by the State parliament. The Urban Bushland Council commends to you the work and data collected by the community group 'Save Kiara Bushland'.

Alternative available: In 2010 when a WA State Metropolitan Region Scheme Planning Amendment was proposed, as a result of well researched community presentations to the WA Planning Commission (WAPC) Hearings Committee, the Committee recommended that most of the Kiara TAFE site be retained and added to Bush Forever. We made presentations to the WAPC and to the Department for Housing and both agencies supported the suggestion of a land swap to protect the important Kiara site. There was a suitable local site available, also owned by the WAPC, which was already cleared and which better suited the Department of Housing as it is bigger and more houses could be built there. This was land adjacent to Lockridge Senior High School. The Department of Housing stopped planning to develop the Kiara TAFE site and switched its focus to the (excess) cleared land at the Lockridge High School site.

This alternative should have been pursued at the time to fruition and we strongly recommend that it be implemented now as an alternative which will not have any impact on MNES.

Now the WA Government wants to develop both Lot 9000 Bottlebrush Drive and the land at Lockridge Senior High School. This is environmentally unacceptable.

Strategic Assessment Perth and Peel Regions

As it was recommended that the Kiara bushland be added to Bush Forever, the quality of the bushland has been recognised by the State Government (DEC). The site comprises an excellent representation of the Bassendean Central and South Vegetation complex which is considerably under-represented in Bush Forever with less than the minimum 10%. This is because there has been so much loss of this complex in both Perth Airport and Jandakot Airport since 2000 - which are notably Commonwealth controlled lands. Indeed it can be argued that the Commonwealth has an obligation to ensure that the Kiara TAFE site is completely retained and protected as a partial counterbalance for so much loss of this complex on Commonwealth lands at the airports.

Here is an opportunity to protect the 14.9 hectare Banksia, Allocasuarina, Jarrah, Marri, Eucalyptus todtiana (Prickly Bark) and Christmas tree communities with its understorey and its fauna. These communities all provide important Black Cockatoo feeding habitat.

We recommend that, as the Strategic Assessment of Western Australia Perth and Peel Regions is in the process of development, bushland and wetland clearing should not be given approval in the interim.

We are told that the advantage of undertaking such a strategic approach is *“the capacity to achieve significant environmental outcomes, including addressing cumulative impacts, at a regional level;”* (Lavan Legal Publications 22 September 2011). The destruction of this Kiara site would be counter to the aims of the strategic assessment.

MNES: Carnaby’s cockatoos and Forest Red-tailed Black Cockatoos

Under the umbrella of the Strategic Assessment, Parsons Brinckehoff were charged with producing a document ‘*Carnaby’s Cockatoo Population Viability Assessment.*’ This company’s assessment of the population of Carnaby’s Cockatoo as being 40,000 was a gross overestimate. The population numbers are not known and best advice is that the population could be from 10,000 to 15,000. We do know that on one night in April 2012, the population on the Swan Coastal Plain, as counted in the ‘Great Cocky Count 2012’ was 5,800. The vegetation on the Swan Coastal Plain supports the population of Carnaby’s Cockatoos providing their feeding and roosting habitat outside the breeding season. We do know from the ‘Great Cocky Count’ by Birdlife Australia in conjunction with DEC, that the population counts of Carnaby’s Cockatoos have declined by 40% since 2010.

The Parsons Brinckehoff PVA presents six scenarios. Scenario 1 models that if clearing of habitats were to cease immediately, and existing habitats were protected but not enhanced, then the existing population would remain stable.

Scenario 2 models that if clearing does not cease immediately and there is no offset by habitat restoration, there will be a general trend towards extinction in 20 years. Johnstone, Kirkby and Sarti state: *“The future survival of these cockatoos [the three species of black cockatoos] is of great concern.”* (Endangered Black Cockatoos in Western Australia- UBC symposium 26 November 2010.)

Marri, Jarrah, Banksia and Allocasuarina are important food resources for black cockatoos. In another area, Shenton Park, Forest Red Tails spend hours in Jarrah and return each day to eat the Jarrah seeds. Similarly, when Marri has seed the Red Tails feed each day in the Marri trees. The WA Museum Information Sheet states of Forest Red-tailed Black Cockatoos that:

It was formerly common, but is now rare to uncommon and patchily distributed over a range which has become markedly reduced.

Ron Johnstone Curator of Ornithology WA Museum has stated that the level of threat to the Forest Red-tailed Black Cockatoos should be upgraded to 'endangered.' Notably in 2012, large numbers of Forest Red Tails came and stayed on the Swan Coastal Plain in many of our suburbs for the first time to our knowledge (over 30 years) for much of the year.

Both Carnaby's Cockatoo and the Forest Red-tailed Black Cockatoo feed in the Kiara TAFE site and have been observed there feeding. Well may we produce recovery plans but if we continue to clear foraging habitat our black cockatoos will be gone. Extinction is forever. We draw your attention to the data collected by the community group 'Save Kiara Bushland' (contact person Kirsten Tullis) which includes records of Carnaby's feeding in the Kiara bushland.

Australia's Native Vegetation Framework

This document, a joint initiative between the Australian government and the states and territory governments, states that:

"Our vegetation is unique, having evolved in isolation from other continents for around 30 million years. [probably much longer]. It has adapted specifically to cope with variations in climate, impoverished soil, fire, and traditional Indigenous land management practices."

The 'Framework' also states that:

"Existing native vegetation, particularly in fragmented landscapes, should be retained and restored." So of this vegetation in a now highly fragmented landscape, the Kiara proposal is to protect a Public Open Space of only 2.5 hectares. This is unacceptable and the whole proposal should be rejected.

Conclusion

The UBC recommends that this proposal for housing and a school and oval on Lot 9000 Bottlebrush Drive Kiara WA not be approved but be rejected because of the significant impact it would have on Matters of National Environmental Significance: namely on Carnaby's Black Cockatoo and on the Forest Red-tailed Black Cockatoo and loss of their feeding habitat, and potential roosting and nesting habitat.

Further, climate change which is already evident in this region puts more pressure on our biodiverse and unique vegetation and fauna which must be given every opportunity to survive into the future. This is for the conservation of biodiversity of nature itself as well as for our children's and their grandchildren's health and well being.

Yours sincerely

President

Urban Bushland Council WA Inc.

PO Box 326 West Perth WA 6872

Phone 08 - 9420 7207

ubc@bushlandperth.org.au

COPY