

22 August 2012

The Chairman
Environmental Protection Authority
Locked Bag 33
Cloisters Square
Perth WA 6850

Dear Dr Vogel

**Referral to EPA for formal assessment
Proposal for housing by Department of Housing: Stratton Bushland, Talbot Road Stratton**

The Urban Bushland Council hereby refers for formal environmental impact assessment under s 38 of the Environmental Protection Act the proposal for housing on the 16.47 ha bushland site on Talbot Road Stratton, which adjoins the northern boundary of Bush Forever site 306 Talbot Road Bushland. This site is known locally as Stratton Bushland.

The significant environmental factors include:

1. Presence of regionally and nationally significant bushland comprising the Guildford vegetation complex, which is under-represented in Bush Forever with less than 10% conserved.
2. Presence of two critically endangered plant communities (TEC), floristic community types 20c and 3a (Marri transitional) listed by the State Government, and which are also listed by the Commonwealth Government under the Environmental Protection and Biodiversity and Conservation Act (EPBC Act) as endangered. A transitional zone of significance is also thought to be present. The presence of the Marri is critically important for Carnaby's Cockatoo as well as the Forest Red-tail Black Cockatoo for forage and potential nesting. Marri supplies the most significant food source and all mature trees must be retained for these endangered species to prevent their continuing decline (Ron Johnstone WA Museum and Geoff Barrett DEC pers. comm.).
3. Presence of listed Rare and Priority species: The area is habitat for four priority plant taxa and the three species of endangered black cockatoos: Carnaby's Cockatoo, Baudin's Cockatoo and the Forest Red-tailed Black Cockatoo (Birdlife Australia WA recently confirmed in survey). Notably the area includes at least one roost site for Carnaby's Cockatoo. Therefore the canopy of tall trees of at least 1km radius around the central roost tree is regarded as critical roost habitat and the surrounding bushland of up to 6km radius is classed as critical forage habitat (Geoff Barrett DEC pers comm July 2012). All three species of Black Cockatoo are listed under both State and Commonwealth legislation.
4. Presence of huge specimens of veteran Jarrah which provide critical habitat such as hollows for many species of fauna. Indeed the Friends of Stratton Bushland have this year observed a pair of Carnaby's Cockatoos using a hollow and believe they are nesting there. Certainly this stand of veteran trees are potential nest trees for black cockatoos if not already so. Notably veteran trees (Jarrah and Marri) need to be greater than 200 years old for large enough hollows for breeding to form. Such old growth trees which are probably 400+ years old are now extremely rare on the Coastal Plain and are reason alone for the area to be conserved.

5. Location of the site - adjoining Bush Forever site 306. Indeed the Stratton Bushland was recommended to be included in Site 306, but was excluded because of an existing proposal for housing. Notably the planning approvals for this earlier proposal has lapsed as no work has commenced. We are advised that a new proposal is now being considered by the Department of Housing.

The Urban Bushland Council recommends that:

- the EPA calls in this new proposal by the Department of Housing for formal environmental impact assessment.
- Further, the EPA rejects any proposal for clearing and development and
- the EPA recommends the site be added to Bush Forever site 306 and managed by DEC to retain its values.

Notably the current landholder has not properly managed the site in its duty of care to retain its values or at least to prevent degradation by rubbish dumping, 4WDs, illegal timber cutting of old trees, and weed invasion.

For your consideration

President

cc WA Museum Curator of Ornithology
DEC Swan Regional Ecologist