

8 March 2011

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

Dear Dr Vogel

REGIONALLY SIGNIFICANT ECOLOGICAL LINKAGES

The Urban Bushland Council WA requests the EPA prepares as a matter of urgency an 'Environmental Assessment Guideline' (EAG) for regionally significant ecological linkages on the Swan Coastal Plain portion of the Perth Metropolitan Region. This involves the linkages identified and shown on map 6 in Volume 1 of Bush Forever as well as other recognised linkages in the area.

When Bush Forever was published in 2000 as a whole of Government policy, the map of the Greenways was included. The Greenways were shown as regionally significant ecological linkages to be retained and enhanced. Local government was encouraged to protect and enhance these linkages through their local planning processes.

The regionally significant ecological linkage which lies between Bold Park and Kings Park is currently under threat by a number of proposals each of which is being considered in isolation and for which there is no adequate policy or process to consider and retain their values. The importance of the function of the ecological linkage to and from Kings Park is now in sharp focus after the extensive hot fire last summer followed by the severe storm in March 2010 which stripped vegetation and killed wildlife. The ecological linkage from Bold Park provides critical roles in providing refugia for wildlife and connectivity for wildlife recolonisation of damaged areas in Kings Park. If the linkage is lost, Kings Park will lose species diversity and condition. The linkages are also essential for the facilitation of seasonal movement of small birds and invertebrates.

In general terms, the experience over the last 10 years using planning processes and clearing regulations, has not been effective in protecting regionally significant ecological linkages. And there have not been any new processes introduced to protect linkages and locally significant bushland areas which are regarded as being essential for the maintenance of the biodiversity of Bush Forever sites in an increasingly fragmented urban landscape. Because of this failure and the current multiple proposals for Greenways 19, the Urban Bushland Council brings this matter to your attention for formal advice.

In the same way that clearing exemptions do not apply for buildings or structures in riparian vegetation '*as this is sensitive vegetation that has important ecological functions and should not be cleared under exemption,*' we submit that native vegetation in regionally significant ecological linkages is also sensitive vegetation that has important ecological functions and should not be cleared under exemption.

Thus the Urban Bushland Council recommends strongly that Greenway 19 and all the Greenways shown in Bush Forever and other regionally significant ecological linkages in the Perth region be declared as Environmentally Sensitive Areas. (ESAs). However we believe that this initiative will need formal advice from the EPA (as an EAG or some other measure) as a basis for decision-making by various authorities. The details for Greenway 19 are attached.

We look forward to your early consideration of these matters.

Yours sincerely

C Mary Gray
Vice President

ATTACHMENT

Greenway 19

Bushland areas currently threatened with development in Greenway 19 are

1.) Underwood Avenue Bushland

2) Bushland on the west and the east side of Bedbrook Place providing a connection between Underwood Avenue Bushland and Shenton Bushland (both are Bush Forever Areas):

- Lot 1194 (number 13) on the west side of Bedbrook Place owned by Dr George O'Neil. Dr O'Neil proposes to sell 0.8ha of his lot to Clinipath and to use that income to fund his proposal on the other part of the lot which is 0.3ha. This is obviously an attempt to get under the 1ha threshold bushland area required for application for a clearing permit.

The City of Nedlands commissioned Syrinx to investigate where connections can be made but because of alleged pressure from Dr O'Neil, the discussion of Greenways in the City of Nedlands committee and City of Nedlands council meetings has been withdrawn at the last minute on two occasions just before meetings.

- Heading south the next lot is owned by the Alzheimers Association.

3.) Monash Bushland in Monash Avenue on the QE11 site. (CPS 4164/1) The proposal is for a temporary carpark for 326 spaces. After the car parking spaces are no longer needed, the QE11 Trust offered the land to the Ronald MacDonald Foundation for a Ronald MacDonald House. Up to 500 Carnaby's Cockatoos roost just west of this bushland. Suitable alternative areas are available for the temporary car park.

4.) 12 Hospital Avenue, Nedlands. This is a block with 20 mature Jarrah and five Banksia trees at the corner of Monash Avenue and Winthrop Avenue. The proposal is for a temporary car parking area for 86 spaces.

5.) Bushland areas within Greenway 19 which have been destroyed are:

5.1) Bushland in AK Reserve which was cleared for basketball, rugby and athletics facilities and offices

5.2.) Lot 11671 205 Stubbs Terrace, Shenton Park. This bushland was completely cleared for the Autism Association administration centre and early childhood intervention centre.

The ongoing process of clearing Banksia Woodland on the Swan Coastal Plain, including the wildlife linkages, is threatening the survival of Carnaby's Cockatoo. This species uses the Greenways 19 areas listed for feeding, for recreation and the areas are close to the roosting sites.

In addition the Graceful Sun Moth has been recorded on Dr George O'Neil's block on 3 March 2011 and the photographs and comments by Matthew Williams DEC are attached.

Dr Robert Davis and Lesley Brooker in their research report state:

- "More than 805 of Perth's native birds face extinction if land clearing continues at current rates
- 83% of the birds studied needed a 2km radius of native vegetation for their survival. These areas are limited to the fringe of the metropolitan area except for Kings Park, Bold Park and some suburban reserves
- This past and continuing decline is due, in most part, to the destruction of native vegetation. Therefore the solution is in our hands. While we continue to allow the spread of urban development without consideration of the needs of the native avifauna then, eventually, the most sensitive birds will be confined to intact landscapes outside urban areas, if any still exist."

For further information about this case please contact Margaret Owen on phone 9387 9105 or leave a message in the UBC office on 9420 7207.