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26 June 2013

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Secretary, Western Australian Planning Commission  
Locked Bag 2506  
Perth WA 6104

**Submission: Metropolitan Region Scheme Amendment 1242/41  
Lot 911 Midland Road, Hazelmere: 'Bushmead'**

The Urban Bushland Council presents the following submission regarding the abovementioned MRS Amendment proposal.

The UBC, a peak community conservation body with some 70 member groups, has a particular interest in the conservation and appropriate environmental management of remnant natural areas in the Perth Metropolitan Region. The land subject to this MRS Amendment proposal (hereafter to be referred to as "the Amendment") is popularly referred to as the "Bushmead" block and the UBC is well aware there has been a long history of dedicated endeavour on the part of various individuals and community groups to protect the environmental values of the area in perpetuity. The UBC itself does not claim to have been as actively involved in the lobbying and negotiations that have taken place over the years as numerous other groups and parties have, but we seek to bring about the best possible protection of urban bushland remnants and the area subject to the Amendment proposal has particularly outstanding conservation values.

Bush Forever is a planning initiative with which the UBC is very familiar, having been a key community driver leading to its initial inception as a conservation plan and having been a consistent lobbyist for its full implementation since its release and adoption more than a decade ago. We note that Bush Forever Site 213, Bushmead Bushland, Swan, constitutes a very substantial portion of the area subject to the Amendment. The UBC is always concerned where planning or development proposals anticipate the loss of land that has been included in Bush Forever and we note that the Amendment envisages the loss of 44.7 hectares of Bush Forever land and the addition of 2.61 hectares of Bush Forever land. It is our very strong view that there is a substantial amount of land proposed for Urban or Urban Deferred zoning in this Amendment that could, and should, be included in Bush Forever.

**Unique transition zone from eastern side Swan Coastal Plain:** The UBC does not propose to recount and reference all the many and varied conservation values the land subject the Amendment has to offer as they have been extensively documented. But in general terms, we must emphasise how unusual and how precious it is to have a large bushland area lying on the eastern side of the Swan Coastal Plain wherein the transition in natural landform, geology and vegetation from the

foothills down to the Coastal Plain is still relatively intact. The transition from the heavier lateritic and granitic soils on the slopes down to the Bassendean sands on the Plain, with alluvial deposition also integral to the site, creates a varied habitat for flora which is reflected in the area's species richness (over 300 native taxa). Kadina Creek adds yet another ecological dimension to this diverse site.

**Fauna:** The area's magnificent trees, even in parts of the site that have a disturbed understorey, create outstanding breeding and feeding habitat for a wide variety of native birds and even for mammals such as the Brushtail Possum. Among the many species of avian fauna utilising the site, are Carnaby's Black Cockatoo (Endangered) and the Red-tailed Black Cockatoo (Vulnerable). The UBC cannot emphasise enough its fears that these species are declining primarily because of habitat loss. It would seem key to the survival of Carnaby's Cockatoo in particular, since it has evolved a pattern of seasonal migration taking in the Perth Metropolitan Region, that its feeding and breeding habitat must be conserved wherever possible. We see mature native trees, even in a parkland cleared setting, as helping to prop up this declining species.

**Wildlife corridors and ecological connectivity:** On the subject of fauna, it is our view that the proposed Urban and Urban deferred zonings pose the significant risk of the larger remnant being effectively split into three sections, a north-western area, a central area, and a south-eastern area. The fauna habitat values of the existing area, especially for terrestrial fauna like the Southern Brown Bandicoot, the Western Grey Kangaroo, and reptiles, would be detrimentally affected by the very deep incursions of urban development across the valley. Terrestrial fauna species need wider corridors through which they can move throughout the site. The UBC is concerned that roads associated with urban development will also pose a serious risk to fauna in terms of animals being killed and injured by traffic. If there is to be urban zoning in this environmentally sensitive area, then special provision must be made to reduce the risk of wildlife being killed on the roads, and of wildlife populations becoming constrained in their range by roads. This points to requirements for such measures as the installation of fauna tunnels under roads and even aerial ladders for such fauna as Brush-tailed Possums. Our advice is that the Bushmead site provides habitat for some rarer fauna species such as the Chuditch and the Carpet Python. As the UBC sees it, the more habitat that is left available to them the greater the prospect that they will continue to be found in the area.

**Protection for conservation: Covenant v P&R:** It is the UBC's understanding that whereas about 213 hectares of the Amendment area is subject to a Conservation Covenant, only about 145 hectares is proposed for Parks and Recreation Zoning. This would appear to us to be a decidedly ungenerous provision in an area of very high conservation values and our overall view is that the area proposed for Urban and Urban Deferred zoning should be reduced to make better provision for the protection of more high quality vegetation and for ensuring the site is not effectively divided into portions by urban development.

The UBC is accustomed to the proposition that grassy or largely degraded areas in the vicinity of higher quality vegetation have no conservation value, but for fauna in particular, our experience suggests very strongly that these areas still provide habitat, linkage corridors, and buffers that should not be discounted. Degraded or significantly disturbed areas would generally not get conservation priority but their position and potential ecological significance in a fragmented landscape must be considered rather than simply being dismissed. In ecological terms, it is difficult to see how urban development would be a preferable neighbour to good quality bushland than a grassed and lightly-treed expanse when one considers the multitude of detrimental environmental impacts urban development invariably brings. Householders dump garden rubbish, weeds and other plants escape from gardens, traffic spreads weeds, litter lines roads, cars hit animals, youths light fires, pet cats kill wildlife, unrestrained dogs attack fauna, fauna is poisoned by pest baits, bandicoots drown in swimming pools, and so on and so forth. Good planning and environmental management can reduce the incidence and severity of such impacts but in our

experience there are virtually inevitable negative environmental consequences when there is urban development adjacent to bushland.

There is also the prospect of regenerating and rehabilitating disturbed areas so that they complement the better quality bushland in the longer term. We would also make the point that although the UBC does not generally see Urban or Urban Deferred zoning as being conducive to positive conservation outcomes in or around high conservation value remnants, we do not believe it is necessary or desirable to clear every single remnant indigenous tree in areas set for development. Too often we see areas “moonscaped” prior to construction works when it would not appear to be impossible to protect at least some larger habitat trees within development zones. This does not make urban development in such areas desirable - it just makes it slightly less pernicious.

**Aboriginal heritage values:** The UBC understands the Bushmead block has significant Aboriginal heritage values in terms of archaeological sites and on-going cultural associations. We would encourage the Planning Commission to give due regard to such considerations. It is our view that protecting Aboriginal heritage should be a matter of interest *to all* Western Australians. We would make the general observation that Aboriginal heritage considerations seldom seem to contribute to the protection of remnant natural areas in and around Perth. This is very disappointing in that a culture so attuned to the regional ecology seems barely valued or recognised through the protection of bushlands or wetlands where there are known to be archaeological, historical or even contemporary Aboriginal associations.

**Conservation management:** It has been suggested that including the protected portions of the Bushmead site in the Darling Range Regional Park or the Beelu National Park would help give it a status commensurate with its outstanding values and improve its prospects for appropriate environmental monitoring and management in the longer term.

We are aware that the **Forrestfield Vegetation Complex**, which is characteristic of the Bushmead block, is very poorly conserved and we find it difficult to see any justification for clearing vegetation of this type when there is so much data indicating we are deep in environmental debt in terms of flora and fauna conservation in the Perth Metropolitan Area.

The existence of the 20a and 20c floristic communities within the Amendment area, together with numerous individual plant species that we recognise as being typical of the far eastern side of the Coastal Plain, points to a site of special significance. The landforms are diverse, the soils are diverse, habitat values are impressive, it has magnificent trees, and it includes a watercourse. Furthermore, it is our understanding it is particularly valued by the traditional owners. The UBC strongly recommends, therefore, that the area assigned Urban or Urban Deferred zoning is eventually very significantly less than that shown in the Amendment document and that significantly more remnant bushland is included in Bush Forever and then protected and properly managed.

Yours faithfully

President  
Urban Bushland Council WA Inc.