



October 5, 2009

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Native Vegetation Conservation Branch

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Bentley Delivery Centre
WA 6983

Submission : Notification of Applications for Clearing Permits "Vision Surveys Pty Ltd Area Permit Lot 1 on Plan 3841, Maida Vale, Shire of Kalamunda, Residential Development, 0.9 ha, (CPS 3308/1)" – Advertised in "The West Australian" of Monday, 21 September, 2009.

To whom it may concern,

The Urban Bushland Council wishes to express its strong opposition to the possible granting of a clearing permit for the 0.9ha block described above. We recommend that the clearing permit be refused.

The UBC is a staunch opponent of further land clearing on the Swan Coastal Plain generally but particularly in areas which are known to be relatively poorly represented in the reserve system. This block is situated on the far eastern side of the Swan Coastal Plain and we would assume it would come under the classification of "Pinjarra Plain" in terms of its location, landscape and soils.

It is our understanding that DEC is supposed to adhere to the Government policy measures for Bush Forever implementation (p xiv Bush Forever Volume 1) that there is a

" general presumption against clearing bushlandgenerally involving vegetation complexes of the eastern side of the Swan Coastal Plain" .

This principle is well founded in that the eastern side of the Swan Coastal Plain has a particularly rich flora and precious little remaining bushland to demonstrate the fact. It is our understanding that the native vegetation on the eastern side of the Swan Coastal Plain is especially poorly conserved south of the Swan River and we take the strong view that virtually all that remains of this vegetation and habitat needs to be protected from further clearing.

Our representatives have visited the site and believe it is well worth conservation. We are not in a position to definitively describe its floristic community type but believe it is likely to be one of those characteristic of the eastern side of the Swan Coastal Plain that are insufficiently represented in the conservation estate. We acknowledge a portion of the site shows strong disturbance but overall the site is worthy of conservation. It is quite evident that the site contains flora that is in some instances more typical of the hills and, in some instances, more typical of the Coastal Plain. This is to be expected on a site that lies a short distance from the hills and has obviously been subject to some alluvial deposition from the same in terms of its soils while having the flat topography more typical of the Coastal Plain.

The block appears to be largely marri woodland with some parrot bush and an understorey that we would describe as being quite florally diverse and interesting. The block is recovering from a fire that probably occurred last summer so it is a little difficult to ascertain the dominant understorey species at the time of presenting this submission.

If this Application for a Clearing Permit were to be taken any further - and we believe it should not be - then we would expect no less than a thorough and detailed flora survey to be carried out over suitable period – meaning throughout the year so as to avoid missing plants having different life cycles. The UBC would not be surprised if DRF or Priority Flora species were to be found on this site as we are well aware the eastern side of the Swan Coastal Plain produces unusual soil types and unusual mixtures of species even in small areas.

The Urban Bushland Council is generally exceedingly dissatisfied with the amount of clearing that is still occurring on the Swan Coastal Plain around Perth and it particularly alarmed at the number of smaller blocks on the eastern side of the Coastal Plain that are being destroyed without proponents even being required to produce credible and worthwhile flora surveys. We would cite the Welshpool area as having some particularly egregious examples of this trend in the past few years. It is unacceptable, it is not in keeping with assurances we have had in the past, and it is ruining the natural heritage of our city. The clearing of small blocks because they are small is a nonsensical approach to reserving our flora and fauna and if precious little else remains in a landscape or a district then that is what we will have to conserve.

For any further information on this submission, please contact Kevin McLean on mob 0407 470 302.

Yours faithfully

C Mary Gray
President
Urban Bushland Council WA