



27 April 2015

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Dear Sir,

Submission re: Residential Estate Development, Mandogalup Urban Development, Mandogalup, WA EPBC Act Ref: 2014/7308

The Urban Bushland Council presents the following submission regarding the abovementioned proposal. The council notes that the proposal involves the clearing of 19.67 hectares of native vegetation which is considered to be habitat for Carnaby's Black Cockatoo and the removal of 58 potential breeding sites.

Protection of Habitat Vital

The Urban Bushland Council (UBC) is particularly concerned that habitat utilised by the endangered Carnaby's Cockatoo (MNES under the EPBC Act) is still being cleared in the Perth Metropolitan Area and beyond. It is our understanding that it is likely that this species will require virtually all of its existing habitat to remain intact if its future existence is to be given a reasonable chance. The species is in alarming decline (15% per year) and the major threatening process and most probable cause of this decline is habitat loss from clearing. It is our understanding that this is an accepted fact and that the only strategy likely to have a significant restorative impact on the population of the species is the protection of existing habitat - possibly augmented by the creation of some additional habitat areas.

As the habitat of Carnaby's Cockatoo on the Swan Coastal Plain is now highly fragmented, the species is at risk of having its habitat progressively eroded by the "death of a thousand cuts" syndrome just as has occurred in the past and just as has led to its current plight. Consequently it is the Urban Bushland Council's very strong view that it is high time the clearing of the remaining habitat for this species ceased. Otherwise Carnaby's Cockatoo is threatened with extinction within 20 years.

Importance of Banksia woodland

From viewing Figure 3 "Vegetation Type and Condition" it is clearly the case that most of the existing vegetation on the site is Banksia woodland. This is ideal feeding habitat for Carnaby's Cockatoo and the UBC has a special interest in the conservation of this vegetation type as it faces many threatening processes itself. It is our understanding that the major Perth and Peel Strategic

Assessment process currently under way (under the EPBC Act) is treating Banksia woodland as a Threatened Ecological Community.

We would make the comment that Figure 3 is curious in its bundling together of “Vegetation Type” and “Condition” categories as they could hardly be expected to match so neatly on the ground. While we accept the existing native vegetation is generally not in pristine condition this does not necessarily detract from its value as habitat for Carnaby’s Cockatoo.

Potential Breeding Trees

The Urban Bushland Council is not satisfied that the proponent is making sufficient provision for the retention of potential breeding trees on the site. It has long been the view of the UBC that land developers are generally not required to conserve enough native trees in development sites and in this instance where quite a large number of trees have been identified as being potential breeding sites for Carnaby’s Cockatoo it is unacceptable that 28 trees so identified are destined for destruction should the proposal be approved. We welcome the proposed protection of 30 potential breeding trees but do not consider the figure sufficient. We note that only tiny proportions of the foraging habitat (0.57 ha) and potential roosting habitat (0.96 ha) are set for protection should the proposal be approved and again it is an exceedingly modest concession. It is essential that foraging habitat surrounding potential breeding and roosting trees be retained and this habitat is considered to be ‘critical habitat’.

Habitat Linkages provide essential ecological services

It is the UBC’s understanding that the proposed development site has no formal status as a reserve or proposed reserve but that is not to say it has no environmental significance in its own right or in its regional context. It has long been the strong view of the UBC that relatively small and dispersed remnants of native vegetation that are often more or less dismissed by environmental agencies still offer an important ecological service in providing ecological linkages and temporary refuges between larger habitat areas for fauna such as Carnaby’s Cockatoo. We do not accept the view that bushland areas can be readily classified as being of regional or of merely local significance as has been the customary approach taken by authorities in Western Australia.

Fragmented habitat areas are preferable to an absence of habitat altogether. The generally smaller blocks of remnant vegetation such as the one subject to this assessment between such reserves (and proposed reserves) as the nearby Harry Waring Marsupial Reserve, Wandi Nature Reserve and Anketell Road Bushland, Wandi/Oakford, Mandogalup Road Bushland, Mandogalup and The Spectacles clearly augment the conservation values of these more recognised habitat areas by providing additional resources, refuges and stopover points for native fauna – particularly native insects and birds. These linkages are critically important to fauna.

Fire refugia

The matter of fauna refuges is important as bushland arson is bordering on being out of control in the Perth Metropolitan Area. This summer there have been an extraordinary number of large fires in bushland around Perth and these large burned out areas lose a great deal of their ecological value for species such as Carnaby’s Black Cockatoo in the short to medium term. The food resources in the form of seeds and summer/autumn flowers are greatly depleted and the bushland may take years to recover. Smaller and somewhat fragmented bushland remnants can provide desperately needed habitat for native bird species otherwise deprived of food and other resources by large scale fires.

Drought refugia

The same issue arises with severe drought whereby the greater extent and range of alternative habitat options available to fauna increases their capacity to survive.

For these reasons the UBC is not convinced that the protection of the more formally recognised bushland and wetland areas in the vicinity of the block subject to this assessment alone is a satisfactory response to the decline of an endangered species such as Carnaby's Cockatoo. This is essentially where the UBC objects strongly to the clearing of remnants such as the one subject to this assessment.

Forest Red-tailed Black Cockatoo

In the **Summary of the Proposed Action** it is stated in Table 4 (p.8) that the Forest Red-tailed Black Cockatoo would be "unlikely" to occur in the proposed development site. The Table states that "Forest Red-tailed Black Cockatoos inhabit eucalyptus forest where it feeds on Marri, Jarrah, Blackbutt, Karri, Sheoak and Snottygobble and nests in hollows of Marri, Jarrah and Karri (Johnstone and Kirkby 1999)."

This species has been a familiar resident on the Swan Coastal Plain for some years. It is wrong to state that it would be unlikely to occur on the proposed development site. Given that the species is Listed as Vulnerable under the EPBC Act and endangered under WA State law this is a disturbing oversight.

The Forest Red-tailed Black Cockatoo feeds on the seeds contained in the woody fruits of *Eucalyptus marginata*, *Eucalyptus rudis*, and *Allocasuarina fraseriana* among other native tree species found on the Swan Coastal Plain. The tree species mentioned all occur on the proposed development site and therefore the site must be regarded as potential habitat. It would be quite unremarkable if they were to be seen feeding in this bushland. Furthermore, the trees that are identified as potential breeding sites for Carnaby's Cockatoo would also provide the same opportunities for the Forest Red-tailed Black Cockatoo. It is our understanding that there have been some relatively recent indications of nesting of this species on the Swan Coastal Plain and it remains to be seen whether the species will not only change its feeding range but also its breeding range as well. It is our view that the Forest Red-tailed Black Cockatoo should be classified as Endangered rather than Vulnerable and the relatively recent extension of its range onto the Swan Coastal Plain is indicative of a species under stress.

Proposed environmental offsets

The Urban Bushland Council is extremely dissatisfied with the way environmental offsetting has come to be used as a justification for clearing irreplaceable natural habitat in metropolitan Perth. The city is being stripped of its natural remnant habitat areas and the urbanised parts of the city will barely contain any native flora or fauna at all if this unacceptable process continues. Being granted permission to clear high dollar value land in exchange for providing funds for the purchase of relatively low cost land at some distant and ecologically unrelated site has become much more of an environmental problem than a solution. Where is the recognition of the biodiversity and uniqueness of the Perth region's natural heritage? Where is the recognition of the rights of future generations to enjoy some of the natural beauty that was endemic to this region at the time of European settlement? If it is the intention of our governments to make Perth as unrecognisable from any other medium sized city in the developed world as possible it is doing a marvellous job. But whereas most other cities destroyed their natural heritage in benighted ages past, we are still doing it today.

There are not enough formal reserves to sustain viable populations of most species of native fauna that once inhabited what is now the Coastal Plain portion of the Perth Metropolitan Region and our

native mammal, bird and reptile species are generally declining in numbers in this area. And our wetlands and banksia woodlands face many threatening processes on top of outright destruction for development. But our State and Federal Governments continue to approve habitat clearing that will only make this situation worse. It is our perception that the citizens and groups concerned about the loss of our natural heritage have completely lost faith in offsetting as a form of environmental compensation and our group, for one, would like to see the clearing it attempts to excuse come to an end.

Conclusion

The EPBC Act puts emphasis on the protection of endangered species but it is not meeting that need. Carnaby's Cockatoo is already facing the problem of insufficient habitat not only in its breeding sites in the Wheatbelt but in its Swan Coastal Plain feeding habitat as well. Offsetting processes that do not address the problem of net loss of habitat are not a solution – they are a form of environmental delusion. The clearing of the remnant vegetation subject to this assessment and others like it will inevitably make the recovery of Carnaby's Black Cockatoo less likely in the longer term and therefore we oppose its approval.

It is strongly recommended that all the clearing be refused by the federal government under the EPBC Act Controlled Action.

Yours faithfully

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