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**Submission by Urban Bushland Council WA**

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**CPS 4164/1: Aurora Projects Pty Ltd on behalf of the QE11 Medical Centre Trust**

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**Recommendations**

1. The Urban Bushland Council does not support the clearing of this bushland and recommends that the permit be refused. The proposal is for a temporary car park and there are other suitable alternatives for such a facility.
2. In the same way that 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. CPS 4164/1 is in part of Greenway no. 19, the regionally significant ecological linkage between the most high profile bushland site in the region - Kings Park, and the even larger site Bold Park. Both these reserves are icons of Perth and the long term conservation of their biodiversity values especially for fauna does depend (amongst other factors) on maintenance of the ecological linkage.
3. For the above reason alone but also because of the failure of planning mechanisms at local government level to effectively protect Greenways even though they are mapped to be protected in Bush Forever (Bush Forever Vol 1: 99 map 6), the Urban Bushland Council recommends strongly that all Greenways shown in Bush Forever and other regionally significant ecological linkages in the Perth region be declared by the Minister as '*Environmentally Sensitive Areas*' (ESAs).
4. We recommend that this proposal for clearing be considered in conjunction with proposed clearing of vegetation on the corner of Monash Avenue and Winthrop Avenue. This site has 20 mature Jarrah, one of which is possibly 300 years old. Mature Jarrah is now a rare feature worthy of protection in its own right in the Perth region. As well there are Allocasuarina trees, five mature Banksia trees and aged Peppermint trees. This site is also part of Greenways 19.
5. In summary, it is nothing less than alarming that most of the ecological linkage values in Greenways 19 are under threat (Aurora projects site, Underwood Ave bushland, corner Monash Ave/Winthrop Ave, 2 or more sites in Bedbrook Place) or have recently been destroyed (A-K Reserve, Autism Association Stubbs Terrace). This threatens the ability of both Kings Park and Bold Park and also Shenton Bushland to retain their diversity of native species and healthy ecological functioning in a fragmented landscape. It is the role of the DEC and the EPA to protect environmental values in the Perth region and there is an excellent plan to do this - in Bush Forever and its associated plans. But the full complement of actions in Bush Forever are not being

implemented in planning decisions at local government level and through the clearing regulations which are supposed to protect biodiversity.

**The Urban Bushland Council recommends that clearing permits be refused for all these threatened sites.**

### **Comments against clearing principles**

#### ***1. Principle (a) Native vegetation should not be cleared if it comprises a high level of biological diversity.***

For a relatively small area in a fully developed urban landscape, the Monash Bushland comprises a very high level of biodiversity of flora species with a recorded 62 native species. (GHD Report). This is likely to be an underestimate. The understory is diverse despite the presence of weeds.

The Jarrah, Banksia and Allocasuarina on the site are significant trees, with some of the trees being of considerable age including some Jarrah trees containing hollows. Jarrah do not develop hollows until over 200 years old. Notably it is simply not possible to provide 'offsets' with hollows of this type, once they are cleared there is a significant net loss. Banksias species present include *B menziesii*, *B attenuata*, *B grandis*, *B lindleyana* and a planted species. There are new, young banksias being recruited indicating the health of the bushland. There is a huge old Jarrah right at the corner of the bushland where it abuts the UWA Medical and Dental Library carpark. These specimens are irreplaceable.

**Clearing this site will be at variance with Principle (a) and therefore a clearing permit should not be granted.**

#### ***2. Principle (b) Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.***

The site is a known feeding site for the endangered Carnaby's Cockatoo. This is documented by Paddy Berry, former Director of Natural Science, WA Museum. Paddy Berry has monitored one of the two main roosting sites in the western suburbs, almost nightly for 27 years. The site he monitors is at the Hollywood Hospital carpark in Monash Avenue, just west of the Hospital Bushland.

The population of Carnaby's Cockatoos is in serious decline and they are in danger of extinction. The main reason is habitat destruction and fragmentation. Carnaby's Cockatoos are a much loved icon of Perth as they are readily visible, highly mobile, and fly in groups over our backyards often calling their distinctive 'weeooo'. The Urban Bushland Council held a well attended symposium on the three species of endangered Black Cockatoos (including Carnaby's) on 26th November 2010 and the summary call was for an end to clearing of black cockatoo habitat with a focus on ending clearing of Banksia Woodlands on the Swan Coastal Plain. Delegates in their feedback recommended that the best way to protect the three species was to end clearing of habitat (in conjunction with other measures such as control of feral bees in nests etc). Policy controls and regulations such as the clearing regulations must be used according to the spirit and intent of the clearing principles.

Respected scientists such as Dr Denis Saunders, former Chief, Division of Wildlife and Ecology CSIRO and a leading expert in the field has said as recently as November 2010 that every Banksia tree is now important for the survival of Carnaby's Cockatoos. The same message comes from Ron Johnstone, Paddy Berry and others.

*"Collectively, the patches of remnant bushland in the western suburbs are now crucial for the future survival of the flock [in the Western suburbs] in the Perth region."*(Johnstone, Ron)

*"The present indications are that the rate of clearing of native vegetation on the Swan Coastal Plain is adversely impacting survival of Carnaby's Cockatoo by depriving it of food resources."*  
.. *"It therefore seems highly likely that a progressive decline of food resources available in the non-breeding season is now also contributing to the decline in numbers. Breeding success is likely to be dependent on birds attaining a high condition level prior to breeding while in their non-breeding range on the Swan Coastal Plain."* (Berry, P., WA Naturalist, December 30, 2009)

The consideration of this clearing permit must be done in the context of what has been lost for Carnaby's Cockatoos as well as the other species of small insectivorous birds using this site. The classic death of a thousand cuts needs to end now for threatened species of birds such as Carnaby's and the score of small resident birds who require sites like this for feeding, nesting, and vegetation cover when crossing the landscape in seasonal migration to and from Kings Park to this site, to Shenton bushland, Bedbrook Place Underwood Avenue, A-K Reserve to Bold Park and north and south along coastal bushland to feed.

**The proposal is at variance with Principle (b) for many species of small birds now threatened with local extinction (as documented in Bush Forever), for Carnaby's Cockatoos, and for the many reptile (goannas, geckoes, skinks, legless lizards etc) and invertebrate species which are bound to be present. Therefore a clearing permit should not be granted.**

***3. Principle (e) Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.***

The area proposed for clearing is representative of the Karrakatta Complex-Central and South. In 2002 there was only 2.5% of this complex in secure tenure (2002). Bush Forever, if fully implemented with Underwood Avenue bushland totally included, only proposed to include 8%. This is under the target of at least 10% to be secured for Bush Forever and well under the 30% target for locally significant areas to be protected by each LGA.

The % secured and % remaining for this vegetation complex should be ascertained from the revision of data (by WALGA and DEP) for the Swan Coastal Plain and Bush Forever areas before any decision is made to permit any further clearing whatsoever of Karrakatta Central & South vegetation complex.

**The proposed area lies in an urban area which is extensively cleared. Therefore the proposal is at variance with Principle (e) and should not be cleared.**

***4. Principle (h) Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.***

The assessment by GHD for this principle is clearly incorrect. The site is part of Greenways 19, the regionally significant ecological linkage as mapped in Bush Forever (Vol 1:99 map 6) and which links Kings Park bushland to Bold Park via Shenton Bushland, Underwood Ave bushland, A-K Reserve. The need for the integrity of the linkage to be retained and enhanced, not reduced, was evident in 2010 after the serious fires in Kings Park followed a few months later by the devastating hail storm of March 2010. These small sites are essential refugia and wildlife corridors at the time of these major disturbances after which they provide a source of fauna for recruitment in recolonising damaged areas.

Bushland in ecological linkages also provide a source of pollen (carried by birds and invertebrates) for recolonising after disturbances like fire.

Thus the loss of bushland at the proposed clearing site can have a significant impact on Kings Park, Shenton Bushland, Hollywood reserve, Underwood Bushland and Bold Park by loss of the ecological linkage values. Many more species are likely to be lost in Kings Park if the linkage in Greenways 19 is reduced any more.

**Therefore the proposal is at variance with Clearing Principle (h) and a clearing permit should not be granted.**

## **CONCLUSION**

**The proposal in CPS 4164/1 is at variance with the four Clearing Principles (a), (b), (e) and (h) and therefore should not be granted.**

Representatives are available to discuss these issues further with you at any time. I may be contacted directly by phone on 9271 5707.

Yours sincerely

C Mary Gray  
President  
Urban Bushland Council WA