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Proposed residential development of Lot 6 Talbot Road, Stratton (EPBC 2013/6983)

The Urban Bushland Council WA Inc, is a peak community conservation body for urban bushland with over 70 member groups, and a similar number of supporters. The Council has had a long interest in Stratton Bushland, has visited the bushland and met with you and Tony De Barro on 20 October 2012 to discuss this area. We call for all of Stratton Bushland (Lot 6) to be added to Talbot Road Bushland as part of the Bush Forever site.

The proposal for a residential development in Stratton Bushland (Lot 6) if implemented, would have unacceptable impacts on an area of bushland with special qualities and significant conservation value. This area contains plant communities of national significance including two critically endangered plant communities listed by both the state and federal governments. It is also thought to contain a transitional zone of significance.

We note that the proposal has been determined to be a 'Controlled Action' by the Australian Government's Department of the Environment and the controlling provisions are

- Listed threatened species and communities (sections 18 and 18A)

Listed threatened species

The Friends of Stratton Bushland has a video of Carnaby's Cockatoos feeding in the Marri trees in Stratton Bushland (facebook page FSB). There is no dispute that the bushland is habitat for three species of black cockatoo. The Friends of Stratton Bushland state that a roosting site occurs within the bushland.

As the convenor lives adjacent to Stratton Bushland, she sees and hears Black Cockatoos coming in during the evenings. Black cockatoos are in danger of extinction because they have been deprived of habitat.

Jarrah and Marri trees

The Jarrah and Marri trees on Stratton Bushland (Lot 6) are magnificent and are part of our national heritage. Such examples of old growth trees are now extremely rare on the coastal plain. Up to 155 Marri and Jarrah trees with potential for providing hollows for breeding are on this site and are at threat by the proposed development. Fourteen trees are recorded with a hollow greater than 200mm and five trees have been recorded with a hollow less than 200mm. These trees have the potential to provide nesting hollows for black

cockatoos in the future. Old nesting trees for Carnaby's Cockatoos in the wheat belt are not being regenerated and are degrading and being lost through fire. Carnaby's cockatoos have had to adapt and breeding is now occurring on the Swan Coastal Plain

Jarrah is very slow growing and big Jarrah trees are 200 or 300 years old.

The 2014 Report of the Great Cocky Count determined that Carnaby's Cockatoos have declined by 15% in five consecutive years to 2014. *On this trajectory the species will be extinct in the Perth- Peel area in fifteen to twenty years. It is the annual net loss of habitat that must be addressed.*

The Urban Bushland Council calls for an end to this net loss of habitat ie an end to clearing habitat – Banksia and Eucalypt woodlands and proteaceous vegetation communities. Habitat of endangered species should not be cleared.

Eastern side of the Swan Coastal Plain.

There is a presumption against clearing all bushland on the eastern side of the Plain under Bush Forever policy. This policy applies to all bushland areas as well as Bush Forever areas.

Recommended for inclusion as a Bush Forever site

Stratton Bushland (Lot 6) was assessed and recommended for inclusion in Bush Forever as part of Talbot Road Bushland. (BF site 306) It was not added finally because of the housing proposal for the site. (B J Keighery pers. Comm. 2014)

Floristic community types

Floristic community types SCP 3a '*Corymbia calophylla – Kingia australis Woodlands on Heavy Soil*' and SCP 20c '*Shrublands and Woodlands of the eastern Swan Coastal Plain*' are 'Critically Endangered' (Bush Forever Vol 2 p 137). Communities listed as Threatened Ecological Communities (TEC) are so listed to endeavor to stop them from falling off the planet.

(pers comm Greg Keighery 5 March 2014). Although SCP 3a is incorporated within the conservation area, the loss of the larger area through clearing would threaten the long-term survival of this TEC.

The Banksia woodlands of the Swan Coastal Plain' have been nominated as a TEC under the EPBC Act and this is now being assessed. In June 2014 the UBC attended the three-day workshop with WA scientists initiated by the federal Department of the Environment. The level of listing is likely to be 'endangered.' Until this listing is declared, the listing is assumed to be in place under the Strategic Assessment for the Perth and Peel Regions and any proposals for development should not be considered. This TEC is highly likely to be listed and it will then become a 'Matter of National Environmental Significance' under the EPBC Act. Therefore the Department of Housing should withdraw this proposal and provide for the transfer of Lot 6 Talbot Rd to the formal Conservation Estate and handover management the DPAW on behalf of the Conservation Commission.

Offsetting

The UBC is strongly opposed to the policy of offsetting. A net loss results from clearing bushland and the so-called 'aspirational' claim that offsetting allows for a 'net environmental benefit' is nonsense. The proposed transfer of 9.3ha of Unallocated Crown Land, Lot 11314 and 8.6 ha of Midland Cemeteries Board land to the Department of Parks and Wildlife does not guarantee the protection of those lots.

In addition those lots are already set aside so do not qualify as offsets.

More importantly the first principle in offset policy is 'avoidance'. This is an obvious case where offsets do not apply as the site is of such high conservation value – most of which simply cannot be replicated (eg old growth Jarrah and Marri with nest, roost and food habitats which take over 200 years to develop).

Alternatives to taking the proposed action

We have a legacy of land zoned 'Urban'. There are occasions where lands so zoned are changed to a more appropriate zoning and this site is one.

The proposal to clear 9.4324 ha of this site is not supported because of the impact on listed protected species and listed threatened vegetation communities. The UBC supports the federal decision for the protection of the habitat of threatened species and vegetation complexes which are at risk from disappearing from the face of the earth and becoming extinct.

Yours sincerely

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