



12 November 2014

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Environmental Protection Authority
Locked Bag 10
East Perth WA 6892

Third Party Referral of RESIDENTIAL DEVELOPMENT LOT 6 TALBOT ROAD STRATTON

The Urban Bushland Council WA Inc (UBC) hereby refers the proposal 'Residential Development Lot 6 Talbot Road Stratton' for formal environmental impact assessment by the EPA under section 38 of the Environmental Protection Act. We recommend that the level of assessment be ARI (b) as it is environmentally unacceptable.

Approval of this proposal would have a significant impact on critical assets of this regionally significant bushland. The UBC has visited the site and has had a long involvement in its protection.

The UBC recommends that the EPA assess the proposal as being environmentally unacceptable, and further that Lot 6 be ceded to the Crown and added to the conservation estate in the adjoining Bush Forever Area 306, as was originally proposed by the then DEP.

PROPONENT: Department of Housing, Level 5, 169 Hay Street East Perth 6004.
The officer to contact is Richard Elliot, Strategic Planner:
richard.elliott@housing.wa.gov.au

LOCAL GOVERNMENT: City of Swan

LOT DESCRIPTION: Lot 6 Talbot Road, Stratton (Certificate of Title-Volume 2149 Folio 404 on Diagram 65009)

LOCALITY: The site is bounded by the Talbot Road Bushland to the south, existing residential development to the west and Talbot Road to the east and north.

SHORT DESCRIPTION: The WA Department of Housing is seeking to develop 9.423ha of Lot 6 Talbot Road Stratton as a residential development.

Significant environmental factors

1. The development will result in the clearing of 155 current/potential breeding trees greater than 500mm in diameter for listed endangered black cockatoos: Carnaby's Cockatoo and the Forest Red-tailed Black Cockatoo as well as clearing 7.59ha of roosting and foraging habitat. Given the rapid decline (15%/year, Great Cocky Count by Birdlife Australia WA) in Carnaby's Cockatoo population due to habitat loss from

clearing, loss of the critical habitat and especially breeding hollows of Lot 6 is environmentally unacceptable.

2. There are rare specimens of 'old growth' Jarrah and Marri proposed for clearing. Old growth Jarrah hundreds of years old is almost non-existent on the Swan Coastal Plain. These rare specimens and their habitat should be protected and added to the adjoining Talbot Road Bush Forever site. They provide habitat for many species of fauna and herpetofauna.
3. Two and probably three Threatened Ecological Communities occur on the site:
 - 1.) Critically endangered TEC *Corymbia calophylla-Kingia australis* Woodlands on Heavy Soil (SCP3a)
 - 2.) Critically endangered TEC Shrublands and Woodlands of the eastern SCP (SCP20c)
 - 3.) In addition *Banksia attenuata* and/or *Eucalyptus marginata* Woodlands of the Eastern side of the Swan Coastal Plain, SCP20b has been nominated as a TEC under the EPBC Act.
Notably, according to Bush Forever policy (Bush Forever Vol 1, p.xiv, Government of Western Australia) there is a general presumption against clearing TECs, and this must especially apply for critically endangered TECs. These are 'critical assets' which must be retained with adequate buffer zones and connectivity to adjoining bushland and cannot be offset.
4. Bushland of regional significance, presumption against clearing.
Stratton Bushland, lot 6, was assessed and recommended for inclusion in Bush Forever as part of Talbot Road Bushland (Bush Forever site 306). It was not added finally at the time because of the housing proposal for the site. (B J Keighery pers comm 2014). This proposal however, did not proceed and planning approvals lapsed. The bushland of Lot 6 is still regionally significant. According to Bush Forever policy (Bush Forever Vol 1, p.xiv, Government of Western Australia) there is a presumption against clearing on the eastern side of the Swan Coastal Plain because so little remains (much less than 10%).
Therefore, and also because this proposal does not constitute essential infrastructure, Lot 6 should not be cleared. The Department of Housing can readily adjust its proposals to build on land already cleared and closer to public facilities.
5. Areas of high fire risk.
Lot 6 is likely an area of high fire risk because of its position at the base of the Scarp and adjacent to woodlands. Under new guidelines and Australian standards, a relatively large area is required to be cleared around new buildings. This would likely encroach on the bushland proposed for retention.
6. Buffer zone to threatening processes
Proximity of disturbance and housing will increase the risk of disturbance by dieback and weed invasion in the retained bushland and critically endangered TECs and also in the adjoining Talbot Road Bush Forever site. There should be a buffer zone of at least 100m around the Bush Forever site and TECs where possible.
7. Significant ecological linkage
Lot 6 forms part of the significant ecological linkage along the eastern side of the Swan Coastal Plain and also links watercourses. This is important considering the paucity of

vegetation remaining on the eastern side of the Plain for movement of fauna, pollen and pollinators and for recolonisation along the link after disturbance.

Referral under EPBC Act

This proposal has already been referred by the Department of Housing to the federal Department of Environment under the EPBC Act and its development number is 2013/6983. It was deemed a controlled action because of Listed Threatened Species and Communities (S18 and 18A). The Department of Environment's invitation for public comment was made on 2 September 2013. The UBC and the Wildflower Society of WA both made comment to the Department of Housing through the federal government referral process. (20 September and 18 September 2014). Copies are attached for your information.

History of proposals

Please note that a few years ago there were proposals before this one that the OEPA advised were unacceptable and required modification. The proponent and Department of Planning were advised of this.

Also we were advised that the Threatened Species and Communities Unit DEC/DPAW advised that a development proposal should be referred to the EPA for formal environmental impact assessment.

We may be contacted through our office on phone 9420 7207 or if unattended on phone 9444 5647 for any further information.

Yours sincerely

President

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