



5 February 2015

[strategyreview@perthregionnrm.com](mailto:strategyreview@perthregionnrm.com)

Perth Region NRM  
PO Box 2206  
Midland WA 6936

## **SWAN REGION STRATEGY FOR NRM –Consultation Draft**

### **Submission by Urban Bushland Council WA Inc.**

PO Box 326, West Perth WA 6872, tel 9420 7207

[ubc@bushlandperth.org.au](mailto:ubc@bushlandperth.org.au)

Contact person: Mary Gray

## **GENERAL COMMENTS**

The Strategy is an overarching, general review of NRM in the Perth region but it does not adequately define the key threats or the way ahead for their control and management. While there is much relevant information included, the document is far too long. It includes far too much process information, vague and broad scale wish lists and precious little about on ground actions needed.

Importantly, there is no state legislative framework in which NRM and the Strategy sits. It is not a government strategy and there is no way it can be implemented without government involvement. It reads as if it were a government document but it is not.

For example on page 8 Action Areas and Strategic Objectives no. 1.5: *'Ensure policies, legislation and standards are effective'*. There is no legislation for NRM or the strategy, there are no state government policies for NRM. What standards? Perth Region NRM simply cannot *'Enforce regulations and approval conditions'* (2.3 p8). Only government can do this.

Many statements are vague or may superficially sound good but are meaningless or there are no means for their implementation. For example: *'Ensure land use planning is environmentally sensitive'* (1.7 p8). Meaningless words or words with different meaning to different people (weasel words) are used: eg sustainability, sustainable use, aspirational. All these words should be removed.

## **SPECIFIC COMMENTS**

### **1.7,p17 Achievements in the Region**

These are not in logical order. Three of the items concern biodiversity and should be defined as such. The ***Bush Forever*** plan provides the framework for the Perth Biodiversity Project and Urban Nature so they belong under it. Bush Forever deserves a few sentences of explanation but there is nil! The Coastcare Program is all about biodiversity restoration.

### **2.2 Natural Assets: 2.2.1 Land**

This section should include all the natural assets of intact landscapes first (ie before the exploited assets of

mining, agriculture). Geomorphological features, geology, landforms and soil types of the land need to be briefly described. The paragraphs on issues do not belong in this descriptive section.

### **2.2.2 Water**

The state's wetland categories and especially Conservation Category wetlands should be described briefly. The nationally significant features of Lake Clifton with its stromatolites and Lake Richmond with its *globally unique* thrombolites deserve addition.

### **2.2.3 p33 Biodiversity**

The south west of WA is a global biodiversity hotspot *for conservation priority because it is under threat*. This last qualifying phrase must be added as it is part of the definition.

As stated, the Bush Forever target at state level is to protect at least 10% of each vegetation type in Bush Forever Areas. However this is in the context of the target of at least 30% to be retained and protected at the local government level, *and* all areas are to be interconnected with regionally and locally significant ecological linkages. The Perth Biodiversity Project (by WALGA) and preparation and implementation of Local Biodiversity Plans by LGAs provide this.

***Thus Bush Forever provides a plan for an interconnected network of regional and local reserves. This is a key outcome on which the NRM Strategy could focus funding to local groups and landholders on the Swan Coastal Plain portion of the NRM region. Much of this network planning is yet to be completed and implemented.***

*Disturbingly, even the ~18,000ha of Banksia woodlands acquired by the State Government for conservation have not yet been transferred to the formal conservation estate. There are currently some 70 Bush Forever Areas acquired by the WAPC which have not yet been transferred to the Crown and vested in the Conservation Commission for management by DPAW. This is a failure in governance. Perth NRM should be aware of this and act to press government to address this and thus prevent avoidable degradation of bushland condition by vandalism, off-road vehicles, bushbashing etc.*

### **2.3 p39 Strategic issues and threats to natural assets**

This is a very important section as it underpins the NRM actions needed. We recommend that it be rewritten in plain simple English to be much more concise and direct.

The key threats to our biodiversity and soil and water quality are:

- Land clearing and fragmentation, unfettered urban sprawl (poor urban form, lack of an urban growth boundary)
- Weeds and feral animals
- Fire
- Groundwater drawdown due to excessive and uncontrolled abstraction, and reduced streamflows and water levels, acid sulphate soils
- Eutrophication
- Dieback
- Lack of knowledge and skills at all levels regarding the difference between proper science based regeneration of natural areas and 'landscape gardening' in bushland

Note: While climate change is obviously a major threat, it manifests as or aggravates the above key issues to be addressed.

#### **2.3.1 p39 Legacy of Loss and 2.3.3 Land Use and development**

**Combine both sections and change the heading to 'Land clearing and fragmentation'**

This is about clearing of Banksia woodlands and shrublands and their management in a fragmented landscape to retain biodiversity values and amenity value to the community.

### **2.3.5 p41 Limited knowledge and awareness**

The disconnect from nature (p42) starts with the experiences of children under the age of 10. There needs to be an initiative involving NRM projects and others to get all primary school children into and engaged with their local natural areas. Some Friends groups do this on a voluntary basis with schools but it needs much more support and education about bushland and landscapes.

### **3.2 The Action Areas, 4 Implementing the Strategy**

This and following sections in our opinion amount to a review of the overarching management and significant failures in governance for management of our natural landscapes and its ecosystems. It also includes a broad scale 'wish list' which Perth NRM has no way of implementing.

## **CONCLUSION**

1. In the view of our members who attended your presentations and have examined the draft Strategy, the NRM strategy needs to be re-written as a short list (as in our key threats as above) of key threats and priority actions (in 1 or 2 pages) which could attract NRM project funding.
2. We believe that with such a list, Perth NRM needs to seek a substantial State Government commitment to a funding program of \$x million for the 2015-16 budget. With funding cuts to State agencies such as DAFWA, DOW and DPAW, a substantial new allocation to on-ground bushcare and waterways and wetland group work is essential in the face of all the increasing threats to our natural landscape.
3. Federal government funding is also needed but should not be relied upon, especially given that WA has no NRM legislation in place.

For any further information on these comments, please contact the Urban Bushland Council as above.

President.

Urban Bushland Council Inc.