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6th October 2012

To whom it may concern,

Submission – Regarding Notifications of Applications Received for Clearing Permits and Amendments Available for Public Submissions and/or Registrations of Interest – as advertised in the *West Australian* newspaper of September 17th, 2012 -

Commissioner of Main Roads Western Australia, Purpose Permit, various road reserves and properties, City of Belmont, City of Canning and the Shire of Kalamunda, road construction for the Gateway WA Project, 112 ha, (CPS 5242/1)

The Urban Bushland Council presents the following submission in regard to the abovementioned Application for a Clearing Permit for the Gateway Project.

The Urban Bushland Council (UBC) is a peak community conservation body with over 60 member groups and many additional individual supporters. The UBC encourages and promotes the protection and appropriate environmental protection and management of remnant bushland areas in and around the Perth Metropolitan Area and in other urban centres throughout Western Australia. The council participates in research and public education projects and has been active for nearly two decades.

The UBC has long taken a keen interest in the protection and environmental management of the remnant natural areas in and around Perth Airport and has produced a great many submissions relating to planning and development proposals potentially having an impact on the bushland, wetlands, and wildlife in the area and has put its views on many environmental management issues pertaining to these natural areas as well.

The boundaries of Perth Airport encompass some outstanding natural remnants and, taken as a whole, it is a very important remaining natural habitat area in the context of the Swan Coastal Plain. The conservation values of the airport were recognised as far back as the early 1980's when the then Department of Conservation and Environment produced the System 6 Red Book i.e. *Conservation Reserves for Western Australia as Recommended by the Environmental Protection Authority -1983 The Darling System – System 6 Part 2: Recommendations for Specific Localities*. In this document the Recommendation for Perth Airport (Site M52) was that “The Commonwealth of Australia retain as much uncleared land as possible” (p.228).

The conservation values of Perth Airport were further recognised in the Bush Forever document published in 2000 wherein Site 386, Perth Airport and Adjacent Bushland, was recognised as having a great many important environmental attributes that any reasonable government or agency

would duly acknowledge and respect. The UBC does not wish to rehearse the history of environmental destruction that has occurred in and around Perth Airport over the past two decades other than to reiterate its view that it constitutes something of a national disgrace. Many decisions having major deleterious environmental impacts on the airport's natural values have clearly been made on grounds that have had little to do with recognising and protecting the values of the existing natural heritage, and it has been obvious that political and commercial considerations have taken precedence over the recognition and protection of the area's outstanding ecological attributes time and time again. This centres on the conventional government view that whereas economic development is a necessity, protection of the natural environment is a luxury. This dismally ignorant view and its pre-emptive prescription for environmental failure – the inability to reconcile development with genuine ecological sensitivity - simply reveals a dearth of sophistication, awareness, and intelligence which bodes very poorly for the future.

Another important area that is threatened with significant impacts by the Gateway Project is the Bush Forever Site 319, Dundas Road Bushland, Forrestfield. This excellent bushland remnant was also recognised in the aforementioned System 6 Red Book, back in the early 1980's, wherein it was recommended for reservation and was referred to as M53. This remnant has also been subject to an unacceptable amount of clearing over the years but it remains an extremely valuable parcel of remnant vegetation and habitat in a zone (the eastern side of the Swan Coastal Plain) that is not only especially noted for its biodiversity but is also poorly conserved as well.

The UBC has members who have known these areas well for many decades and who are well aware of their environmental context and their environmental significance. The UBC values urban natural areas on a number of levels and not simply or exclusively for their so-called scientific values. The UBC is all in favour of rigorous scientific evaluation and assessment but does not necessarily regard such limited data as crude plant or vertebrate species counts taken in relatively small sampling areas over limited time intervals as constituting anything approximating a worthwhile ecological evaluation of a particular site. The UBC has often had cause to question whether such information effectively presented in an assessment document as the “scientifically-derived cornerstone” of an assessment could accurately be said to provide a “scientific” basis for informed conclusions at all.

While the UBC is strongly in favour of scientific criteria having an important role to play in determining decisions relating to clearing approvals, this view is tempered by considerations such as the amount of detailed and reliable scientific data pertaining to a specific site being available . Sometimes there is no data available, sometimes there is a limited amount of data available, and sometimes the UBC is not convinced the surveys and studies have been rigorous enough, or extensive enough, or interpreted with a view to providing a scientifically objective picture. It is our view and experience that environmental assessment documents routinely downplay environmental values, underestimate impacts, and include assurances with respect to mitigating impacts and compensating for the same that turn out to be completely worthless. If environmental assessment documents contained very detailed, accurate, site-specific, and up-to-date ecological data - together with rigorous analysis thereof - and reliable forecasts of environmental impacts, the UBC would accept that a scientific process had been followed. That is the proviso the UBC would put on agreeing to the prioritisation of scientific criteria in environmental approvals processes.

Together with specific scientific criteria, the UBC advocates the conservation of urban bushland for such purposes as retaining the unique character of the city, for enhancing people's appreciation of the natural environment, for breaking the aesthetic monotony of urban development, for providing children with ready access to the natural environment, for providing opportunities to educate children as to the workings and qualities of natural systems, for providing opportunities for passive recreation and relaxation, for providing birds with breeding and feeding refuges that enhance their ability to maintain a presence in suburbia, for developing a sense of communal ownership and

responsibility for the environment, for providing seed banks for future rehabilitation projects, and for providing islands of cooler air in the hottest and most oppressive months and so on. The council is aware that the Clearing Permit Application process centres on “10 Clearing Principles” but wishes to make the point that these criteria are somewhat arbitrary and do not encapsulate the full benefit that the community might derive from the conservation of native vegetation and habitat by any means.

This submission will address the “10 Clearing Principles” more specifically henceforth in this submission. In its *Gateway WA Public Environmental Report* (June 2012), prepared as a requirement under the *EPBC Act (1999)*, the proponent, Main Roads WA, addressed the State Clearing Permit Application process and its 10 Clearing Principles in Tables contained in the document (Tables 12, 13, p.40- 46). The UBC recently requested some supporting documentation associated with the advertised Clearing Permit Application from the Native Vegetation Conservation Branch from the N.V.P Branch itself but none was supplied. The Native Vegetation Conservation Branch’s website is not easy to negotiate and, for some reason, the specific clearing information component containing the aerial image etc. seems prone to triggering computer security systems – even to the extent of locking the user out of the site. This is very inconvenient but we would have to admit little information is supplied regarding Clearing Permit Applications on the site anyway. We will address some of the responses to the 10 Clearing Principles appearing in the aforementioned *Public Environmental Report*.

There are 2 separated Tables in the *Public Environmental Report*, one (Table 12) purporting to deal with Commonwealth land – Tonkin Highway/ Boud Avenue and Leach and Tonkin Highway interchange are cited – and the other (Table 13) purporting to deal with State-owned land – Horrie Miller Drive/Kewdale Road/Tonkin Highway interchange and the Roe and Tonkin Highway interchange being cited. However, a substantial portion of native vegetation to be taken up by the Leach and Tonkin Highway interchange is not on Commonwealth land but on an existing Main Roads reserve which is state-owned land. The actual airport boundary is well to the east of Tonkin Highway for hundreds of metres in this area and this broad Main Roads Reserve includes native vegetation we consider to have high floral biodiversity and strong faunal habitat values. It contains some magnificent old native trees and is in quite good condition despite Main Roads’ failure to protect it from such abuses as unauthorised access with trial bikes and rubbish dumping for several decades.

Another point we wish to make is that along parts of Tonkin Highway subject to the Gateway project’s footprint there is quite good quality native vegetation on the verge itself and even in the median strip towards the northern end. The UBC always found Main Roads very dismissive of the environmental values of this vegetation in consultation processes and it appears to be virtually ignored in the assessment documents. The Council finds this disposition grating and unjustifiable on environmental grounds. Main Roads WA may be used to annihilating large swathes of native vegetation on a regular basis but the scale of their operations does not justify their dismissive attitude towards smaller or narrower remnants within a larger project. It is our very strong view that all of the native vegetation must be recognised for its environmental values and the Council is of the strong view that the lack of recognition of the Tonkin Highway’s fringing vegetation as an existing wildlife refuge and corridor is a major oversight in the *Public Environmental Report* and in its responses to the 10 Clearing Principles contained in that *Report*. Our members with a knowledge of the area are aware this verge and adjacent vegetation (and our reference to native vegetation here is to naturally regenerating indigenous vegetation) provides habitat for native birds, reptiles and mammals (including Southern Brown Bandicoots) that are rarely, if ever, seen in nearby suburbia.

A) Native vegetation should not be cleared if it comprises a high level of biodiversity.

There is no doubt the proposal is clearly at variance with this principle. In the *Public Environmental Report (PER)* the proponent merely admits “The proposal may be at variance with the Principle” in both Tables (Table 12 purporting to deal with Commonwealth land and Table 13 with State land). This entire region can be said to be on the eastern side of the Swan Coastal Plain and it is widely known that this side of the Coastal Plain has the highest floral biodiversity. Given that the Perth area itself is a region of high biodiversity and that very substantial and more or less interconnected tracts of native habitat are in line for clearing under this proposal the UBC does not accept that any conclusion other than that it would involve the destruction of areas of “high biodiversity” would be credible. Perth Airport has been fairly extensively surveyed for flora and fauna – possibly not to the extent that we would have preferred – but it has been recognised in survey after survey as an area of high biodiversity.

The proposal involves clearing both wetland and bushland vegetation, the imposition of major faunal barriers and hazards, further risks of weed and disease spread, and the risk of more fires – just to name a few of the inevitable impacts. **The Tonkin and Leach Highway interchange, in particular, impacts on a very good quality habitat area and its ecological transitions from wetland to ridge habitat are now rarely to be found in reserves so close to the city.** The Roe and Tonkin Highway interchange is another aspect of the proposal that cannot avoid that clearing of substantial areas of high biodiversity. **Bush Forever Site 319, Dundas Road Bushland, Forrestfield** would be heavily affected and it has an especially diverse flora. This site lies right in the zone where the sands of the Coastal Plain begin to be replaced by the heavier alluvial soils washed down from the scarp –hence its unusual floral assemblages of high conservation value.

The UBC finds the proponent’s claim that the proposal “may be at variance” with the Principle that **Native Vegetation should not be cleared if it comprises a high level of biological diversity** quite outrageous. The UBC insists that this proposal would involve the clearing of vegetation that indisputably comprises a high level of biological diversity and therefore insists it should not be cleared.

B) 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.

Again, in relation to this Clearing Principle, the proponent in the *PER* document, merely claims the proposal “may be at variance with the Principle in both Tables. The UBC insists that the large area of habitat concerned (112 hectares is specified in the advertisement calling for submissions for the Application for a Clearing Permit) and the important species that utilise the habitat point very strongly to the proposal at variance with the Principle. Many native fauna species that are probably declining in numbers on the Swan Coastal Plain, and in the Perth Metropolitan Region in particular, are found in the area affected by the Gateway proposal. Whether this be small bush birds or reptiles or even amphibians the UBC is in no doubt that the area subject to the proposal is extremely valuable habitat for the maintenance of numerous such species in the region. However, we are aware that most attention is likely to be devoted to such species as the *EPBC* listed Carnaby’s Black Cockatoo (Endangered S1), the Red-tailed Black Cockatoo (Vulnerable, S1), and the *WA Priority* species, the Southern Brown Bandicoot (P5). We do not agree that these species alone should represent the sole consideration in destroying faunal habitat on such a large scale but even on account of these species the proposal is clearly at variance to the Principle.

The UBC should not have to point out to the Native Vegetation Conservation Branch of the DEC that Carnaby’s Cockatoo is desperately short of feeding habitat on the Swan Coastal Plain. Our

members have been aware for many years that this species utilises virtually every patch of remnant bushland in the metropolitan area during the winter months and will even visit small and obscure garden plantings year after year for the simple reason that so much of its natural habitat has been cleared. The amount of Banksia woodland that has been cleared at Perth Airport – and at Jandakot Airport- over the past decade and a half indicates how little the Commonwealth Government cares about endangered species. The scheduled clearing of the Gnangara pine plantations over the coming years together with further clearing for urban expansion seems likely to push this species into a particularly parlous state. Carnaby's Cockatoo seems to have a preference for feeding in the Banksia woodlands in and around the airport and it is the Urban Bushland Council's very strong view that any clearing of Banksia woodland, or even bushland in which *Banksia sp.* trees or shrubs only occur sporadically, is a direct threat to the future survival of Carnaby's Cockatoo as a species. The UBC has been stating this case for many years and nobody is likely to prove it is invalid. **There appears to be no reversal in its decline and unless its breeding and feeding habitat is protected and enhanced we cannot see how it can be expected to maintain its numbers let alone build on them.**

The *PER* document makes some attempt to delineate Carnaby's Cockatoo habitat and while we agree it makes sense to do so to try to avoid clearing the best banksia woodland areas, leaving out areas that are clearly utilised by the birds as "non-core" habitat is somewhat misleading. The Cockatoo may rely heavily on the banksia woodland for food but the woodland itself will probably only thrive in a broader ecological context itself, so claiming the adjacent wetlands or bushland areas dominated by other tree or shrub species are not "core habitat" does not make much sense. They may not provide the Carnaby's Cockatoo with the greatest proportion of its nutrition but they may well be very important in maintaining the continued health and vitality of the banksia woodland's ecology generally – by providing nesting and alternative feeding habitat for pollinating birds, for example.

The Red-tailed Black Cockatoo is undergoing a strange change in its patterns of movement and its "invasion" of Perth's coastal plain over the last few years is both puzzling and disturbing. This species will require very careful monitoring as such a profound disruption to its normal behaviour is suggestive of something being amiss in its conventional range. The UBC has heard suggestions that its normal range is becoming too dry, and that it has lost too much in the way of food resources but whatever the case the species is now utilising bushland remnants throughout the metropolitan area. It does feed on Cape Lilacs and River Gums in parks and gardens scattered around the suburbs but it also makes extensive use of such typical bushland species as *Eucalyptus todtiana*, *Allocasuarina fraseriana*, *Eucalyptus marginata*, and *Corymbia calophylla* – all of which occur in the project area. Our presumption would be that the species is probably better off feeding on bushland species than Cape Lilacs but our observation, though it is not scientifically proven, is that the bird appears to be pressed to find food when the Cape Lilacs are not holding large quantities of berries. It is our view that this species may be in some trouble and the clearing of large areas of potential feeding habitat trees cannot be helpful. **Given that large numbers of the species now occupy the Perth Metropolitan Region for what appear to be substantial periods of time, and that they are frequently observed feeding in bushland remnants throughout the city, the UBC is of the strong view that these remnants should be treated as important habitat for the birds unless or until it is proved otherwise.**

The Southern Brown Bandicoot is relatively abundant in the project area and has been for many years. Our members familiar with the wider district have, however, reported the gradual disappearance of the species from the smaller remnants scattered throughout the Belmont/Kewdale/Welshpool/Forrestfield area over the past couple of decades and from bushland areas that were once extensive but which have now become fragmented and reduced in size. There

is no room for complacency in maintaining the numbers of this amazing survivor. So many similar-sized native mammals have succumbed to the ravages of human encroachment and feral predators that this species seems quite exceptional. But in and around Perth Airport it has very large contiguous habitat areas in which to find food and to find refuge from such predators as foxes and cats. It can also readily move to new areas if it is displaced by fire or it can colonise areas that have been previously devastated by fire. The fragmentation of this habitat and the reduction in its actual extent is not going to help the population of this species in the project area and its vicinity at all. And this would be very regrettable as it is one place in the metropolitan area where it really does thrive. The barriers constituted by the construction of major roads and bridges are also a major threat to the bandicoots. *They are very susceptible to being killed and injured by traffic and if this project is ever approved it must include a condition that suitable faunal tunnels, or even bridges, should be constructed to allow bandicoots and other fauna to move between habitat areas.* Perth Airport makes extensive use of such unintentional barriers as ring mesh fencing and we have heard very disturbing ideas for the construction of so-called “noise walls” along some sections of the proposed roads. **These “noise walls” have the appearance of being a complete faunal barrier and the UBC would regard them as being environmentally unacceptable.**

The UBC has no reservations in claiming this proposal is at variance with the Principle that **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.**

C) Native Vegetation should not be cleared if it includes, or is necessary for the continued existence of, rare flora.

In Table 12 (*PER*) the proponent states that “a total of 18 plants of *Macarthuria keigheryi* (T) were recorded within the project area proposed for the Leach and Tonkin Highway interchange, but will not be impacted by the Project.” It goes on to claim that the proposal is therefore “not at variance with the Principle” **The UBC is of the strong view that if the species has been found in such numbers in the project area then the project area must constitute suitable habitat for the plant.** Much of the area affected by the proposal in the vicinity of the Leach and Tonkin Highway interchange is actually bushland in good condition so the fact that the footprint of the project may miss the known specimens of the species by a metre or two metres or a hundred metres does not mean suitable habitat for the species - that may even contain seeds of the species - is not subject to the clearing proposal. **It is our view that bushland in the vicinity of rare plants constitutes the habitat of the rare plants and that the proposal is therefore at variance with the Principle.**

Furthermore, in Table 13, the proponent states that “*Conospermum undulatum* (T) has been recorded at a number of locations in the areas proposed for the upgrade of the Roe and Tonkin Highway interchange and at one location opposite Daddow Road. GHD (2010-2011) counted a total of 185 plants which included locations previously recorded by AECOM and the DEC.” It also states that “*Conospermum undulatum* (T) is listed as Threatened at the State level under the *Wildlife Conservation Act 1950* and at the Federal level under the *EPBC Act (1999)*.”

Here the proponent admits that the proposal is at variance to the Principle and we cannot but agree. The proposal would appear to constitute a very serious threat to an important population of an endangered species and we would expect very substantial environmental offsets to even attempt to compensate for such a loss.

The UBC is aware that much of the project area in and around the Tonkin and Leach Highway interchange was subject to a very large bushfire earlier this year. **It is our very strong view that flora surveys should be conducted, especially at this time i.e. Spring, to determine whether the**

fire has caused any previously undetected species to emerge. It is our view that it would not be at all unlikely that many more specimens of such species as *Macarthuria keigheryi* might be located and that rare orchid species, such as *Caladenia huegelii* might also be found. This is not an unreasonable request and the UBC would be very dissatisfied if no further survey work were to be carried out in response to the fire.

D) Native Vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of a threatened ecological community.

Table 12 in the (*PER*) simply states that no TEC's were identified in the Tonkin Highway/Boud Avenue and the Leach and Tonkin Highway interchange areas. Since the UBC is not expert in identifying such communities we are hardly in a position to dispute this claim other than to state that the "TEC" concept does not seem to produce conservation outcomes we would regard as satisfactory.

Table 13 (*PER*) states that one quadrat in the Roe Highway/Tonkin Highway interchange area "has some affinities with TEC SCP 02" which is classified as Endangered and then goes on to say this TEC "may" occur in the area. This is not very definitive and we would see this as indicative of a problem with the TEC concept itself. **Is it a TEC or is it not? Why are these statements so noncommittal? Surely vague statements like these have no place in a scientific analysis put out for comment.**

It is the UBC's view there are plant communities in the project area that should be regarded as threatened. But whether they meet the criteria for this TEC or that TEC is anybody's guess. The concept of TEC's is a frustrating one for community organizations such as our own as even so-called experts do not seem to be able identify them unequivocally in the field.

E) Native Vegetation should not be cleared if it is a significant remnant of vegetation in an area that has been extensively cleared

Tables 12 and 13 in the (*PER*) state that "The vegetation of the project area is considered to be representative of the Southern River Complex and Bassendean Complex – Central and South. These complexes are classified as "Vulnerable" in terms of extent of vegetation, with 19.8% and 27% respectively, remaining compared to pre-European extents"

The proponent claims "clearing of native vegetation within the Project area will not significantly reduce the known extent from pre-European extents across the whole complex." It appears the proponent is comparing the Project area to the pre-European extent of the complexes. This is an irrelevant and misleading comparison. What matters is the extent of these complexes remaining in the area and in the PMR, the % of this remaining area to be cleared, and the % of each complex protected. **Less than 4% of the original pre-European extent of Bassendean central & south vegetation has some level of protection** (see attachment) which is significantly under the target of at least 10% set in Bush Forever. Indeed significantly large areas of this complex both in Perth and Jandakot Airports have been cleared and lost from Bush Forever sites. **For the Southern River complex, 8.8% has some level of protection and only 2.55% is considered formally protected** (see attachment). Thus both complexes are under threat.

In the part of the PMR surrounding Perth Airport, most of the vegetation has been cleared and in fact what is remaining is mostly within the airport – so this vegetation is critical to maintaining

connectivity within a strip of land 16km wide from Swan Canning River in the west to the Darling Ranges and also between Brixton St wetlands and N-S link to Bennet Brook (BFS 305).

There is no doubt then that the area is extensively cleared. 112ha is a significant remnant in this context and particularly as it comprises two threatened complexes and also provides this critical ecological connectivity.

Therefore the proposal is seriously at variance with Principle (E)

Hypothetical analysis undertaken as part of the Regional Framework for Local Biodiversity Conservation Priorities for Perth and Peel project identifies both complexes as potentially threatened – because it assumes <10% retention in Perth and Peel if no adequate consideration is given to retention of the remaining vegetation when considering the land use provisions of the regional schemes. The analysis considered increased retention rates within Bush Forever lands.

(See RFLBCP Priorities for Further Investigations/Level 3 Prioritisation

http://pbp.asn.au/index_public.html link will take you to the explanatory text on page 48.)

It is also important to raise the limitations of the datasets being used to assess vegetation retention levels – remnant vegetation extent mapping is done at 1:20 000, vegetation complex mapping was done at 1:250 000. Remnant vegetation extent mapping includes degraded vegetation and might include exotic vegetation and therefore is considered an overestimate

The UBC opposes bushland clearing except in the most pressing and unavoidable of circumstances and is of the very strong view that individuals or organisations doing so should be legally obliged to devote very considerable resources to compensate for the environmental damage they inflict.

F) Native Vegetation should not be cleared if it is growing in or in association with a watercourse or wetland

Table 12 in the (PER) states that:

' There are 32 wetland systems within the Project extent and 17 of these occur within the area proposed for the Leach and Tonkin Highway interchanges. Eight of these wetlands are classified as "Conservation Category," six as "Multiple Use" and three as "Resource Enhancement" and further states that:

' The Perth Airport Woodland Swamps are classified as a nationally Important wetland site (SEWPaC, 2010) and are protected under the Environmental Protection (Swan Coastal Plain Lakes) Policy 1992 (Lakes EPP) This includes Runway Swamp, which is located in the area proposed for the Leach and Tonkin Highway interchange.'

The proponent clearly acknowledges that the proposal is at variance with the Principle and the UBC is very concerned about the loss of wetland habitat that this proposal entails. One of the worst aspects of potentially losing this wetland habitat is that it is largely in a bushland context. Most of the region's natural remnants lack the intermingling of wetland and drier bushland vegetation and it lends a special variety to the habitat that is very useful for fauna. The loss of these wetland remnants would be entirely regrettable. Very substantial compensation would be required to offset these losses.

Table 13 in the (PER) states that "there are five "Conservation Category" and three "Resource Enhancement" wetlands located within the proposed disturbance footprint for the Roe and Tonkin Highway interchange." Again the substantial environmental impact of the project is evident and it is clearly seriously at variance with Principle (F).

(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 Tonkin and Leach Highway interchange cuts through a 30 hectare Conservation and Infrastructure Zone established by WAC. The proposal will have a major impact on this Infrastructure Only Conservation Zone and every effort must be made to reduce its impacts on this area if it is to be approved. The proposal threatens to constitute a great hazard to fauna in terms of traffic volumes and a substantial barrier to faunal movement. This is on top of the sheer loss of vegetation which will be substantial. The proponent concedes that the proposal is at variance with this Principle.

Table 13 in the (*PER*), which takes in matters relating to the Roe and Tonkin Highway interchange claims “There are no DEC listed conservation areas in or adjacent to the Project area.” **However, the Roe and Tonkin Highway interchange proposal impacts directly on Bush Forever Site 319 and is close to Bush Forever Site 440.** There is no doubt that Bush Forever Areas are “conservation areas” and hence we reject the claim that the “proposal is not at variance with the Principle” made in Table 13. **We of the strong view that the proposal does impact significantly on adjacent conservation areas and is therefore significantly at variance with Principle (H)**

Concluding comments

- The Urban Bushland Council appreciates the opportunity to make these comments.
- The Council is of the very strong view that the Gateway project has numerous very serious environmental impacts on an area that can generally be said to be of very high conservation value.
- The Council sees the proposal as being at variance with 7 Clearing Principles A, B, C, D, E, F, and H and objects strongly to the extent of the clearing in the proposal and trusts the DEC will deal with the proposal appropriately with very significant modifications imposed.
- The UBC is opposed in principle to the concept of “offsetting” the clearing of native vegetation but if this notion is to be applied in this case, we would expect the “offsets” requirements to be very substantial indeed.

Yours faithfully

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Attachment 1: see page 10 overleaf

Attachment 2: 2010 Remnant Veg Extent Stats Sept 2011 (pdf) - from PBP WALGA

ATTACHMENT 1: Data on extent of native vegetation remaining in Perth and Peel regions**Source: Perth Biodiversity Project Manager, October 2012****Western Australian Local Government Association**

The figures for the extent of vegetation remaining are available for the Perth and Peel area and they are published on the PBP website <http://pbp.walga.asn.au/Publications.aspx>

A copy is also attached.

These tables demonstrate that:

For the **Bassendean Central and South** – 27% of its pre-European extent on the Swan Coastal Plain (South of Moore River) remains and only 3.75% of the pre-European extent has some level of protection. Another table in the attached document shows that 22.7% of the pre-European extent within the PMR and Peel Region Scheme area remains, and 9.8% has some level of protection but only 3.27% could be considered formally protected. It is also worth noting that over 72% of the regional pre-European extent is within the administrative boundaries of the PMR & Peel Region Scheme areas.

For the **Southern River Complex**, 19.7% of pre-European extent remains on the Swan Coastal Plain, and 2% has some level of protection. 18.2% of pre-European extent remains in the PMR and Peel Regional Scheme area with 8.8% having some level of protection or 2.55% being considered formally protected. As above, it is also worth noting that over 72% of the regional pre-European extent is within the administrative boundaries of the PMR & Peel Region Scheme areas.

The analysis based on August 2011 land use categories shows that most remaining vegetation within PMR and Peel Region Scheme area is zoned Rural, 12.8% of Southern River is within constrained zones & reserves and 5.9% on Commonwealth land. For the Bassendean Central and South, 9% is within constrained zones and reserves and 2.6% is on Commonwealth land.

It is also important to note that land zoned Rural in the regional schemes can be developed at local level within Rural Residential subdivisions that do not provide for adequate retention of vegetation through to other Rural type to Rural Conservation, that provide very good opportunities for retention and protection. However, so far, Rural Conservation is only applied in the hills (Kalamunda) except the Shire of Serpentine-Jarrahdale, where 1040ha of Bassendean Central and South and 15.7ha of Southern River is zoned Conservation. (see table 2010 Remnant vegetation extent by vegetation complexes for each Local Government available through the link above).

Hypothetical analysis undertaken as part of the Regional Framework for Local Biodiversity Conservation Priorities for Perth and Peel project identifies both complexes as potentially threatened – because it assumes <10% retention in Perth and Peel if no adequate consideration is given to retention of the remaining vegetation when considering the land use provisions of the regional schemes. The analysis considered increased retention rates within Bush Forever lands. See RFLBCP Priorities for Further Investigations/Level 3 Prioritisation http://pbp.asn.au/index_public.html link will take you to the explanatory text on page 48.

It is also important to raise the limitations of the datasets being used to assess vegetation retention levels – remnant vegetation extent mapping is done at 1:20 000, vegetation complex mapping was done at 1:250 000. Remnant vegetation extent mapping includes degraded vegetation and might include exotic vegetation and therefore is considered an overestimate (see notes under the tables in the attached documents).