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Submission – Bushmead Residential development Hazelmere, Western Australia
EPBC Act Ref: 2015/7414

The Urban Bushland Council presents the following submission regarding the abovementioned proposal put forward by Cedar Woods Properties Limited to develop land for residential purposes in Hazelmere.

The Urban Bushland Council (UBC) is a peak community conservation body with over 70 member groups. The UBC has been existence for over twenty years and has been active in lobbying for the conservation and appropriate environmental management of remnant bushland in and around Perth over this period. The UBC has also participated in scientific research programs and has conducted education and training programs and seminars on the conservation and management of urban bushland and its flora and fauna. The UBC's member groups and supporters are passionate about the protection and appropriate environmental management of the remaining native vegetation and habitat in and around Perth and the Council takes a keen interest in proposals likely to affect important remnant bushland sites.

The Bushmead site in Hazelmere (Lot 911) which Cedar Woods Properties Limited proposes to develop has long been recognised for its outstanding environmental values and the UBC is aware that representations to the Commonwealth government have been made by members of the community regarding the conservation of the site and its flora and fauna over a period spanning decades. The UBC acknowledges all this effort by various community members and is of the firm view that the Commonwealth should not only acknowledge this effort but also bring to fruition the hopes of the people who have put so much energy into the cause of conserving this site's outstanding environmental values.

The environmental significance of the site has actually grown over time, as extensive and on-going clearing of native vegetation and habitat on the Swan Coastal Plain makes each remnant more and more essential for the survival of our magnificent flora and fauna.

Preliminary Comments

It is the strong view of the Urban Bushland Council that, ideally, the whole of Lot 911 – that is, the whole of the Bushmead site should be set aside for conservation purposes. There are degraded areas within Lot 911, but even these generally have important habitat trees. In the UBC's opinion, a "parkland cleared" environment would be greatly preferable to the residential developments and

roads that are proposed for some of the less pristine portions of the site. Residential development constitutes a far more imposing environmental barrier to fauna and the potential expansion of existing flora and habitat than does a fairly well wooded area with a degraded understorey.

The contention of the proponent that residential development and various rehabilitation initiatives will actually lead to an overall improvement of the site's environmental values is unconvincing. The Council has seen such arguments mounted before with respect to the development of numerous other sites around Perth and the claims and the eventual results seldom, if ever, prove to have much in common. We have no reason to doubt the proponent is confident good environmental outcomes can be achieved but experience tells us that development of the kind envisaged not only removes habitat and potential habitat but also poses new threats to the areas proposed for conservation.

The UBC prepared a submission regarding a proposed Perth Metropolitan Region Scheme Amendment (1242/41) regarding Lot 911 in June 2013 and our disposition towards the rezoning(s) – since approved – has not changed. The proposed residential development poses significant threats to the environmental values of the site. Of most concern is the effective division of the undeveloped parts of the site into 3 more or less separate portions. At the Scheme Amendment stage we objected to this splitting of the undeveloped areas of site into 3 sections – largely because of the potential impacts on fauna. Connectivity is vital for terrestrial fauna in particular and it is our strong view that wider undeveloped corridors between the proposed conservation areas would be greatly preferable to those presented in the proponent's Report.

However, despite our objections to significant elements of the overall proposal, the UBC would have to concede that it makes far more allowances for environmental protection than most development proposals that come to our attention and the focus on the immediate vicinity of the proposed development in terms of offsets and conservation provisions make it a far more acceptable model of development than that to which we are generally accustomed. The standard proposal whereby areas of high conservation value are completely cleared in return for the purchase of an "environmental offset" land far distant from the affected site that has no ecological relationship with the same is a persistent and unacceptable practice that meets with our constant disapproval.

To see conservation provisions being made more or less on site or in the immediate vicinity of development is refreshing and it is a model we would prefer to see as the standard rather than the exception. Remote environmental offsetting may be convenient for developers but it is destroying our urban bushland heritage and it will seriously affect the environmental values of the Swan Coastal Plain as a whole.

We are aware the proponent is somewhat constrained by Conservation Covenant considerations and Bush Forever listing but the proposed retention of large areas of native vegetation and habitat on Lot 911 is pleasing – certainly in comparison with the entirely unacceptable treatment of the nearby environmentally outstanding bushland and wetland areas at Perth Airport. The lack of protection for the native vegetation and habitat at Perth Airport is a disgrace and it flies in the face of the widely acknowledged need to protect what little bushland remains on the eastern side of the Swan Coastal Plain. The Lot 911 proposal does protect valuable portions of this remnant habitat and the Commonwealth would be well advised to insist on such "on-site" conservation provisions being made with respect to other development proposals affecting the eastern side of the Coastal Plain.

The UBC's comments on the documentation associated with the proposal are as follows:

Bushmead Black Cockatoo Habitat Survey (Bamford Consulting Ecologists)

There is no doubt Lot 911 contains a substantial amount of good quality feeding habitat for Carnaby's Cockatoo and the Forest Red-tailed Black Cockatoo. We note that of the 329 trees identified within the impact areas, 109 were found to have potentially suitable hollows for nesting and 10 were found to have been used recently (not necessarily by Black Cockatoos but by parrots) (p. 3-7).

The UBC is exceedingly concerned about the plight of the Black Cockatoo species that frequent the Perth region and the prospect of losing feeding and potential roosting and breeding trees in such numbers is disturbing.

The UBC insists that as many trees as possible must be retained in the Development Area. We note that in "Enclosure 1: Information requested on 23 February 2015" it is stated that:

> 'The Bushmead project is still in the planning stage, so it is difficult, at this stage to confirm the exact number of significant trees that will be protected in the Development Area. The proposed Local Structure Plan is currently being considered by both the State Department of Planning/ Western Australian Planning Commission and the local City of Swan and modifications are currently being made to public open space locations and urban design to address drainage and other considerations.
>
> Current considerations show some 58 trees being retained within the proposed public open space reserves in the Development Area. Attachment 2 shows the location of these trees. Effort will be made to increase this number during the detailed design stage. Up to 3 of the 10 trees which show evidence of recent parrot activity are included in the trees to be identified by the City of Swan to ensure their long term protection. After the current round of modifications, a revised plan and estimate of trees to be retained will be undertaken.' (p.3).

In the UBC's experience, it is far better if proponents make reasonably firm commitments about minimum rates of tree retention and other related conservation measures at least before environmental approvals are granted as intentions vaguely stated have an unfortunate tendency to become "that was then" stories once the bulldozers have commenced work. It is the UBC's very strong view, after observing many assessment processes and their aftermaths over many years, that assessment documents should require firm minimum environmental commitments from proponents and that it should be possible to require proponents to demonstrate that they have in fact made every effort to optimise environmental outcomes before final approvals are issued.

The proponent proposes to revegetate 38.3 hectares of degraded Black Cockatoo habitat with "Black Cockatoo foraging and breeding species" (p.4.)(Enclosure 1: Information requested on the 23 February 2015). While the time frame for producing feeding habitat is realistic in the context of this project, the production of "breeding habitat" is not. It is common knowledge that trees will not produce good hollows for nesting purposes for such large birds within 100 years. This is the whole point of doing everything possible to retain potential breeding trees.

Comments on the Referral

2.1 Description of proposed action (p.8)

The UBC is of the view that there should be wider undeveloped wildlife corridors adjacent to the proposed residential development sites (involving a slight reduction in the extent of the residential developments) so that the two development cells do not form such substantial barriers between the areas proposed for conservation. Fragmentation of habitat areas is highly undesirable and one of the

real environmental strengths of Lot 911 is the continuous undeveloped strip of land extending so far out onto the Coastal Plain from the foothills. This is quite unusual – if not unique- and is a legacy of the site's former usage as a rifle range. It provides an opportunity for fauna more likely to be found on the Darling Scarp – such as the Brush-tailed Possum and the Chuditch - to move down onto the Coastal Plain. Even if the undeveloped areas left to form more substantial linkages between the proposed conservation areas were somewhat degraded, they could potentially be rehabilitated at some time in the future.

It is noted that the proponent has a "Project Vision" (p.8) which "integrates future housing with surrounding Conservation Area" (p.8). This is to be achieved:

'through retention of natural landscape and levels, corresponding retention of significant trees, revegetation with native species and compatible water management systems and (sic) which play an important complementary role in enhancing local biodiversity.' (p.8).

Integrating housing with conservation areas would not generally be regarded as a strategy for improving environmental outcomes and the fact has to be faced that residential development would bring some considerable environmental threats to the remaining native vegetation and habitat. Some of these threats are listed below:

- Dumping of garden rubbish in bushland
- Weeds escaping from gardens
- Fauna exposed to traffic (death, injury, barrier to movement)
- Artificial lighting affecting fauna – nocturnal fauna
- Increased risk of arson – children and juveniles
- Litter dumped along roads
- Pet cats and dogs killing wildlife
- Fauna poisoning by pest baits
- Fauna drowning in swimming pools
- Dieback risks from spores, infected material in garden soil entering bushland on boots, wheels etc.

The UBC is well-placed to know that residential development close to bushland does bring risks to the environmental values of the bushland. Most of these risks can be reduced with good management but by and large residential development is likely to bring more challenges than improvements.

The matter of retention of existing trees and revegetation with native species is of particular interest to the UBC as we are all too accustomed to seeing bush blocks cleared in their entirety. We note that:

> 'The proposed action involves the clearing of approximately 50 ha of potential Black-Cockatoo foraging and breeding habitat within the Development Area. However, not all vegetation in the urban areas will be removed. Indicative urban design for both of the urban infill cells indicates that approximately 23 trees with hollows and 2.5 ha of significant tree canopy area is expected to be retained. This is consistent with the understanding that the Black Cockatoos are known to inhabit urban areas and to forage on both introduced species of plant as well as eucalypts and Banksia trees that remain in the urban fabric. Introduced landscape trees will also expand these foraging areas.' (p.8).

The UBC has concerns regarding the reference to "introduced landscape species" being utilised in the urban cells. While the Black Cockatoo species will feed on various exotic trees and trees not

necessarily native to Western Australia or the local area, it is our view that trees utilised in community or public landscaping should be local native habitat trees – such as the Marri, Jarrah and Banksia species. Exotic trees are currently more horticulturally fashionable but these developments should be adding only suitable habitat trees wherever possible to compensate for the very considerable losses that are anticipated.

Threatened Fauna

The UBC is surprised at the indication that the EPBC Act listed *Conospermum undulatum* would be "unlikely" (p.13) to occur on Lot 911 as it would appear to us to be very much within the geographic range where this species could be expected to occur.

We are also surprised that the Chuditch (*Dasyurus geoffroii*) is described as being "unlikely" (p.16) to occur on the site as it does occur on the Darling Scarp – with which the site is contiguous. It is our understanding this species has even been observed at some sites on the eastern side of the Coastal Plain not far from Lot 911. Its occurrence might be notable but not "unlikely" in our view.

The description of the amount of "Black-Cockatoo" habitat that is available in the vicinity of the site is in serious need of refinement. First of all, in a document of this type, it is not appropriate to bundle all the "Black Cockatoo" species together as if they had identical habitat needs.

The Forest Red-tailed Black Cockatoo (*Calyptorhynchus banksii naso*) is a species that is more likely to feed in Eucalypts like Jarrah and Marri (*Eucalyptus marginata* and *Corymbia calophylla* respectively) than Carnaby's Black Cockatoo (*Calyptorhynchus latirostris*), which is more likely to feed in the proteaceous species in Banksia woodland. However, both species will tend to nest in large Eucalypt species. The Referral makes the following claim:

> Extensive areas of Black-Cockatoo habitat are located in the vicinity of Lot 911 within protected areas such as local reserves, Bush Forever Sites and Parks and Wildlife managed estates (Figure8; Table 7). Within 15 km of Lot 911, approximately 22,000 ha of protected Black Cockatoo habitat is available (p. 18).

Figure 8 is apparently intended to illustrate the amount of "Potential Black Cockatoo Habitat" there is available in the vicinity of the site. But the Figure is misleading. Carnaby's Cockatoo foraging habitat around Perth is generally understood to be on the Swan Coastal Plain – and particularly in the Banksia woodlands. The Forest Red-tailed Black Cockatoo generally does not feed on Banksias but will visit scattered Eucalypts on the Coastal Plain.

So, for a start, the "Black Cockatoo" is not a single species and the two main Black Cockatoo species generally have somewhat different foraging requirements. It would be fair to say there is considerably less secure Carnaby's Cockatoo foraging habitat in the vicinity of Lot 911 than there is secure foraging habitat most suited to the Forest Red-tailed Black Cockatoo. But this is not apparent from Figure 8.

There is another problem with Figure 8 and the linked reference to Bush Forever sites on page 18. Bush Forever sites are not necessarily reserves and they are not necessarily reserved. In some instances, being included in Bush Forever confers no additional conservation status on the land whatsoever. A very good example is Perth Airport. In Figure 8, the extensive remnant bushland area at Perth Airport is shown as potential Black Cockatoo Habitat and as a Bush Forever site. Perth Airport is the largest bushland area on the Coastal Plain within 10 km of Lot 911. It does contain extensive areas of very good quality habitat for Carnaby's Black Cockatoo, in particular, and it is

indeed a Bush Forever site. Unfortunately, the Commonwealth does not recognise Bush Forever and accords land so classified no particular conservation status.

Perth Airport is on Commonwealth land and Bush Forever is a WA State Government initiative. Given that the State Government has not protected all Bush Forever sites under its own jurisdiction, it is, perhaps, not surprising that the Commonwealth accords such sites no particular conservation status. Furthermore, the Commonwealth recently allowed the Perth Airport leaseholder to remove the only two Conservation Precincts on the site (amounting to 310 hectares in total) from the *Perth Airport Master Plan 2014.* The consequence of this action is that the remnant Black Cockatoo habitat at Perth Airport now has no protection other than that afforded by the EPBC Act - which is none whatsoever.

In short, Perth Airport should not appear in Figure 8 as if it were a "protected area" of potential Black Cockatoo Habitat. Neither should the banks of the Swan River estuary be shown as potential Black Cockatoo Habitat. There are some reserves along parts of the river but to show the whole length of both banks – including the foreshore in central Perth – as Potential Black Cockatoo Habitat is ridiculous and incorrect. Herdsman Lake and Lake Monger, about 20 kilometres from Lot 911, would not appear to us to be potential habitat for Black Cockatoos given that there are mostly either water or reeds and they are not in a particularly natural state.

Our overall point is that protected foraging and breeding habitat for Black Cockatoos – particularly Carnaby's Black Cockatoo – is in short supply. This is particularly the case on the Swan Coastal Plain. The UBC welcomes the proposed protection of the native vegetation and habitat on Lot 911 and supports the retention of as many trees as possible in the Development Areas but this is only one site of many that need protection if Carnaby's Cockatoo – and potentially the Forest Red-tailed Black Cockatoo - are not to slide into extinction.

Significant Impact Criterion (Assessment of potential impacts to Black Cockatoo species) (p.19).

Will the action lead to a long-term decrease in the size of a population?

As these species are not studied to the extent that it would be likely to be possible to identify individual "populations" visiting Lot 911 within the larger populations that are of concern with any great certainty, we refer here to the "populations" of the species in general.

The UBC notes that the proposal will "result in the removal of approximately 50 ha of potential foraging habitat and potential breeding habitat for Black-Cockatoos" (p.19). Given that Carnaby's Black-Cockatoo is in serious decline the UBC takes the view that any significant clearing of its habitat – and this is significant habitat – will contribute to an eventual reduction in Black Cockatoo populations. The Referral claims "the proposed clearing will not lead to a long-term decrease in the size of the Black Cockatoo populations" (p.19) but we disagree.

It is obvious that habitat loss leading to decline in Black Cockatoo populations has been, and is continuing to be, a cumulative process. In the historically early stages of the removal of habitat suitable for Black Cockatoos more than 150 years ago, no single project could have been identified as leading to the long term decline of the species concerned. And given the highly fragmented state of its remaining suitable habitat on the Swan Coastal Plain caused by clearing - and in the forested areas by the removal of older and larger trees - it may still largely be the case that individual clearing – or logging/mining – projects could not be specifically identified as causing overall population declines. The damage is done piece by piece and the pieces become more and more vital as the

process continues. But the majority of proponents can claim that their individual proposals involving habitat loss will not lead to a measurable decline in populations attributable to their particular projects. So the species are declining, they are losing their habitat, and nobody is responsible. It is an absurd situation and it has reached the point where Governments should act responsibly and bring the process of habitat destruction to an end.

The UBC welcomes the commitment – and we presume it is a commitment – by the proponent to undertake "the strategic retention of a number of large trees within the development area" (p.19). We would like to see a clearer commitment to the retention of a large number of trees, including large trees, but the concept of retaining trees is one we support strongly.

Another argument evinced by the proponent as to why the proposal will not lead to a long term decline in Black Cockatoo populations refers to:

> Extensive areas of habitat available outside of Lot 19 within protected areas such as local reserves, Bush Forever Sites and Parks and Wildlife managed estates (p.19).

This is the standard explanation familiar to anyone who reads environmental assessment documents pertaining to habitat loss issues generally and to Black Cockatoo habitat loss in particular. It is our clear understanding, and the UBC even ran a large seminar on the predicament of Black Cockatoo species in the south west of Western Australia several years ago, that species such as Carnaby's Black Cockatoo are already facing a foraging and breeding habitat deficit. That is to say, there is probably insufficient available habit in existence to sustain their present population – hence their declining numbers. Nobody with any knowledge of the subject thinks they are increasing in numbers and the UBC has any number of members with a long history on interest in natural history who can vouch for the fact that Carnaby's Cockatoo numbers have declined substantially over the decades. It is this situation which fuels our disgust with the process of *"environmental offsetting"* whereby clearing of habitat is permitted if ostensibly equivalent habitat is purchased elsewhere. The problem is net loss of habitat and Government has failed miserably in its responsibility to protect our much-loved and iconic species.

The commitment involving the "revegetation of 38.3 ha. of Black-Cockatoo habitat within the Conservation Area with species suitable for foraging and breeding" (p. 19) is interesting but we would like to know how this would be achieved. It is certainly a worthwhile objective but rehabilitation and regeneration of degraded sites – especially dryland ones – on the Swan Coastal Plain poses many challenges. While the proponent is proposing to revegetate with *"species suitable for foraging and breeding"* (p. 19) it is not clear whether these species are intended to be species native to the local area or simply species that the birds are known to feed on. There are many shrub and tree species that are not local to the local area that could be used for foraging habitat but the UBC would much prefer to see local native species used as part of a natural area rehabilitation process rather than see merely "native" species being employed to create a foraging "garden" or plantation. Rehabilitation and regeneration with local species is difficult but it is a more satisfactory long-term environmental objective than simply establishing a foraging plantation. The reference to revegetating to produce breeding habitat is somewhat fanciful as anyone alive today would probably be deceased before any such breeding tree habitat would become useable.

We do not accept the argument that suggests that the proposal "will not lead to a long-term decrease in the size of the Black Cockatoo populations due to the nature of Black Cockatoo populations, which are highly mobile with extensive ranges" (p.19). It is the argument of every proponent that the birds can go somewhere else but is the lot of the birds to find they are running out of suitable alternatives. Carnaby's Black Cockatoo, for example, visits virtually every patch of

woodland, no matter how small, on the Swan Coastal Plain around Perth, every autumn and winter. But because of continued clearing, these remnant patches are becoming smaller, and fewer, and further between. Consequently, flocks are smaller and the birds consume more energy moving between smaller blocks offering meagre food resources. Carnaby's Cockatoo has an extensive range but Perth sprawls over an enormous area relative to its population and urban development – combined with agriculture – has greatly reduced Carnaby's Black Cockatoo's habitat over a vast area of the Swan Coastal Plain. The species is mobile but it cannot keep flying longer distances to smaller and fewer habitat remnants indefinitely. The fact is that every instance and element of habitat loss is now contributing to the pressure on the species' survival prospects. The Urban Bushland Council vehemently objects to the Commonwealth's continuing to grant approvals to projects likely to be contributing to the extinction of Black Cockatoo species. And, alarmingly, many of these projects are considerably more environmentally harmful than the one under consideration here.

Will the action reduce the area of occupancy of the species? **(p.19)**

It is difficult to see how the proposed residential developments *"will not lead to a reduction in the area of occupancy of the species"* (p.19). There is clearly a net loss of habitat trees in Lot 911 and breeding trees take so long to replace it is virtually meaningless to claim to be replacing them. What is also concerning is the claim that "introduced landscape species will also expand these urban foraging areas" (p.19). In general, "introduced landscape species" – by which we presume is meant trees that are not only not native to the local area but not native to Australia – are not going to provide much foraging habitat for Black Cockatoo species.

The Forest Red-tailed Black Cockatoo has a well-known predilection for seeds of the exotic Cape Lilac tree (*Melia azedarach*) but this is an unlikely choice for landscaping given its production of poisonous berries, the profusion of berries it drops on the ground, and its susceptibility to a moth species whose caterpillars invade homes pestilently. Carnaby's Cockatoo feeds on exotic nut trees but these too are unlikely landscaping selections. If they were to feed on such trees in private gardens they probably be deterred by homeowners. It is our view that local native trees would be the best choice for landscaping but other native trees and shrubs could also be utilised. Issues such as attracting birds close to roads and road hazards might need to be considered. It is also the case that these species can be very wary of human or animal activity nearby and they will move off if alarmed. It is our view then that there would still be a diminution in the number of suitable habitat trees available overall and there would therefore be likely to be a reduced occupancy of the Black Cockatoo species on Lot 911.

Will the action adversely affect habitat critical to the survival of a species? **(p.19).**

We have already provided comments on the cumulative effects of individual instances of clearing on Black Cockatoo populations and it is our view that all remaining Black Cockatoo habitat should be regarded as "habitat critical to the survival of the species."

Will the action modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline? **(p.20).**

The Referral states that "the proposed action is not expected to interfere with the recovery of Black Cockatoo species as suitable habitat is retained in a number of existing reserves in close proximity

(Table 7)" (p.20). Table 7 purports to give areas of Black Cockatoo habitat "within secure reserves" (p.20) within certain radii of the proposed action. The UBC has some doubts about the compilation of these figures in so much as in Figure 8 – showing "Potential Black Cockatoo Habitat Surrounding Bushmead" - Bush Forever sites are shown along with Local Reserves and DPaW Managed Estates – suggesting that Bush Forever sites are in fact reserves. Regrettably, they are not necessarily reserves and they are not necessarily protected from development.

Table 7 refers to 289.37 hectares of Southern River Vegetation Complex being in "Secure Reserves" within 5 kilometres of the proposed action. The only substantial area of "Southern River" vegetation complex we know of within 5 kilometres of the proposed action is at Perth Airport. The Commonwealth should be well aware that none of the remnant vegetation at Perth Airport is in a "secure reserve," despite its inclusion in Bush Forever. Furthermore, the figures of most relevance to Carnaby's Cockatoo where foraging habitat is concerned would be those relating to the Swan Coastal Plain. It is on the Plain that the figures are most concerning – not on the scarp or in the hills.

It is the UBC's view that any loss of foraging and breeding habitat for Black Cockatoo species is likely to accelerate their decline because loss of habitat is the most obvious cause of their continuing decline. This process of decline has been apparent for decades. If a person is suffocating it doesn't make sense to claim removing oxygen will do no further harm.

***Will the action interfere with the recovery of the species?* (p. 20)**

Any reduction in the available foraging and breeding habitat for Black Cockatoos is likely to interfere with the recovery of the species. We are not actually aware any of the Black Cockatoo species are "in recovery" in reality and we are yet to see any initiative from the State or Commonwealth that is likely to achieve any significant recovery. Unless there is a total ban on the clearing of their existing habitat the State and Commonwealth are simply allowing our Black Cockatoo species to die out.

Measures to avoid or reduce impacts (p.29).

The measures proposed to avoid or reduce impacts are generally supported, but the UBC is of the strong view that there should be wider undeveloped linkages between the proposed conservation areas within Lot 911. This would mean sacrificing some residential land but it would improve opportunities for fauna to move between these areas and also create more opportunities for revegetation. Revegetation of the Conservation area is highly desirable and we insist that this should be carried out using local species. This is a very challenging task and the difficulty should not be underestimated. Even the problem of obtaining sufficient local seed has led proponents working on other projects to renege on verbal assurances that such work would be undertaken. We expect the Commonwealth to make sure the proponent undertakes the work set out in the Referral in the manner described – should the proposal be approved.

Fire Management Plan (p.31)

When it comes to fire, there are obvious risks in integrating residential developments with conservation reserves. It is the UBC's hope that the residential development takes the brunt of the modifications required to maximise community safety. The residential areas may need extra hydrants, more detailed fire plans, and close liaison with the local fire and emergency services.

Prospective residents would have to be made aware that their residences would face a bushfire risk and that that risk could be reduced but not eliminated. It would be regrettable if major additional clearing for fire breaks were to be undertaken for the purposes of fire hazard reduction adjacent to housing and the proponent should be factoring such a possibility into the provision of land for conservation. A significant environmental impact on the retained bushland caused by residential development may come from requirements for fuel load reduction burning in the conservation areas. The issue of controlled burning is controversial and the UBC generally does not favour programmed burning for fuel load reduction on the Swan Coastal Plain. Burning has a tendency to encourage grassy weed species which become fire hazards in themselves.

CONCLUSION

The UBC is opposed to the clearing of habitat areas that are utilised or that may be utilised by Black Cockatoo species for foraging, breeding, or roosting. This proposal involves the clearing of good quality Black Cockatoo habitat and, to that extent, we oppose it.

However, thanks to the work of various individuals over a very long period of time, the conservation values of the site have been well documented and recognised. Accordingly the proponent has made provision for the conservation of a substantial area of bushland adjacent to the project area. This is a considerable improvement on most of the proposals that come to the UBC's attention. The UBC generally objects to environmental offsetting being used to attempt to justify the clearing of important native vegetation and habitat but if it is to be employed, then it is greatly preferable that the offsetting occur in close proximity to the area where the native vegetation and habitat is being destroyed and that it primarily involves the permanent reservation of related or equivalent native vegetation and habitat.

We have expressed some reservations about aspects of the information supplied in the Referral and disagreed with some of its conclusions. We have also put the strong view that it would be preferable to have more substantial undeveloped linkages between the main conservation cells to improve habitat connectivity for fauna and to increase revegetation opportunities.

We appreciate the opportunity to provide comments.

Yours faithfully

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