



14 April 2016
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Submission on Shenton Park Draft Improvement Plan

SUMMARY

1. The Urban Bushland Council WA and the Friends of Underwood Avenue Bushland strongly recommend that the DOP and WAPC reject the Shenton Park Draft Improvement Plan in its current form, and further that WAPC advises Landcorp to significantly modify the Plan so that the whole of the regionally significant ecological linkage of 3.4ha native vegetation is retained and restored, and also that the current car park area (within the linkage) is re-vegetated with local species.
2. We strongly recommend that the WAPC rejects all clearing and development in the 3.4 ha area of bushland on the western side of the RPH development site. Retention of the bushland linkage is part of Bush Forever policy (see details below) and is consistent with SPP 2.8.
3. In our submission to the Secretary WAPC on the MRS Amendment 1293/57, we argued that the zoning of 'urban' over the mainly cleared site to the east of the bushland is appropriate to facilitate development. However we argued that the 3.4 hectares of bushland on the western side must be zoned Parks and Recreation, because Landcorp has no intention whatsoever of protecting it. The outcome from submissions on the MRS rezoning do not yet appear to be available. Again we recommend that the 3.4ha bushland strip on the west side of the site be rezoned for P&R.

SPECIFIC COMMENTS

There is a whole series of government policies, advice by the EPA, expert and community advice and recommendations which have been ignored in a serious abuse of process by Landcorp. These are detailed here.

In support of retention of the 3.4 hectare bushland part on the west of the site:

1.) **Minister Redman stated:**

*'There is also recognition of the key biodiversity corridor, the bushland vegetation in the western boundary of the site, which will be **largely retained** as part of the development.'* (our emphasis) (media release 23 May 2014). However it is not clear what 'largely retained' means.

The essence of this 'recognition' and commitment has been ignored by Landcorp.

2.) **The EPA stated:**

'The EPA notes that there is Banksia woodland in 'Very Good' condition located on the western side of the subject site. This woodland provides a vegetated linkage between Shenton Bushland and Underwood Avenue Bushland (both Bush Forever Sites).

The EPA supports the proposal to retain the Banksia woodland in Public Open Space and to also retain as much remnant vegetation as possible. The EPA expects that this advice will be implemented as part of the local planning scheme and subsequent subdivision and development applications. (25 May 2015 Advice under Section 48A (1) (a) EP Act 1986) **This advice has been ignored by Landcorp.**

3.) The Office of the EPA stated:

'The woodland is in very good condition and provides an important linkage between Shenton Bushland and Underwood Avenue Bushland (both Bush Forever sites). Therefore, the retention of this vegetation in public open space areas on the site is supported.'

This advice has been ignored by Landcorp and the draft Plan is contrary to the EPA advice.

4.) The Mayor of the City of Nedlands stated:

'There should be no buildings permitted in the area between the north-south road from Lemnos Street and the western boundary of the site. All of this land should be allocated for retention of existing natural bushland, with degraded areas rehabilitated.' This view is supported by the City of Nedlands.

'The public interest is best served if land west of the north-south road is retained for environment protection and biodiversity conservation and all native trees on the site are protected with tree preservation orders, to aid the survival of the Black Cockatoos.

The Department of the Environment should intervene to ensure this outcome.'

This advice has been ignored by Landcorp.

5.) Of the people's consultation Landcorp stated:

'Saving mature trees and flora and fauna' was the biggest response from a community survey with 91.6% of respondents citing this as most important'. Landcorp manipulated this response by stating that the word 'bushland' was only mentioned by 32.8% of the respondents, so 'bushland' came second. 'Bushland' was considered by Landcorp to be different from 'Saving mature trees and flora and fauna.'

This is a dishonest representation of community views and is totally unacceptable. It is an abuse of process. The community survey overwhelmingly (>90%) called for retention of remnant native vegetation. Landcorp has ignored this community request.

6.) Submissions to DOE

We are advised that some 80 submissions were received by the federal Department of Environment and we suggest that almost all wanted the bushland protected for its value as a linkage, for species reliant on it, as a protection from climate change and for the benefits to the community. The DOE stated that there was 'significant interest in this proposal'.

OTHER DOCUMENTS SUPPORTING RETENTION OF THE LINKAGE

- **'Ecological Linkages and Urban Fauna at Risk on the Swan Coastal Plain Perth WA'** by Dr Robert Davis and Lesley Brooker, Dec. 2008
'More than 80% of Perth's native birds face extinction if land clearing continues at current rates'.
- **Directions 2031**
'We should grow within the constraints placed on us by the environment we live in'.

- **Great Cocky Count 2014 report by Birdlife and DPAW**
'Such a rapid decline [15% decrease per year for the last five years for Carnaby's cockatoo] may manifest in the loss of flocks associated with particular roosts and, if this trend continues, it is of serious concern for Carnaby's Black-Cockatoos in the Perth-Peel Coastal Plain'.(p 28)

Forest Red-tailed Black-cockatoo

'Significant FRTBC roosts occurred at Murdoch University (n = 199 birds roosting), Floreat (n = 109), Kensington (n = 94), Munster (n = 92), and Yokine (n = 47).'

- **Carnaby's Cockatoo Recovery Plan August 2012 – 2022, DPAW**
'The long-term survival of a robust population of Carnaby's cockatoos depends on the availability of suitable woodland breeding habitat and tree hollows, and foraging habitat capable of providing enough food to sustain the population'. (p 12)
- **Forest Red-tailed Black Cockatoo Recovery Plan, DPAW**
'Habitat critical to survival and important populations of Forest Black Cockatoos comprises areas: currently occupied by the cockatoos; not currently occupied by the cockatoos due to recent fire but capable of supporting cockatoo populations when sufficiently recovered; of natural vegetation in which the cockatoos nest, feed and roost; of natural vegetation through which the cockatoos can move from one occupied area to another';

2012 Recovery Plan – 4 main performance criteria:

*'1. Area of occupancy doesn't decline
4. Maintain the extent of nesting, breeding and roosting habitat throughout range'*

- **Recovery teams - DPW, Birds Australia, WA Museum, Perth Zoo, ECU, UWA, Murdoch, Landholders, guests**
*'Common objective:
To stop any further decline in the breeding populations and to ensure their persistence throughout their respective ranges in the south-west of Western Australia.'*
- **Bush Forever Volume 1, the site is part of Greenways 19**
Where possible, greenway concepts should be incorporated into future planning proposals as part of the development of best practice planning and design solutions. (p39)
Bush Forever includes a map of greenways linkages which includes the RPH site (Bush Forever Volume 1 p 99). The linkage is Greenways 19.
- **Bush Forever Volume 2 states**
'Underwood Avenue Bushland; Linkage: adjacent bushland/canopy to the south; part of greenways 19: part of a regionally significant potential bushland/wetland linkage'.
- **EPBC Referral Guidelines for three threatened black cockatoo species October 2012**
'...large areas of foraging habitat are required to support black cockatoo populations'. (p 12)
High risk of significant impact:
'clearing of more than 1ha of quality foraging habitat' (p 2)
- **Perth and Peel @ 3.5 million, Environmental impacts, risks and remedies: EPA interim advice**

to the Minister for Environment, July 2015

'The EPA considers that efficient use of existing cleared land, and smart urban infill that is mindful of potential amenity impacts and a changing climate, will deliver a city that is more liveable and sustainable.'
(page 5)

- **Strategic Assessment of the Perth and Peel Regions**

'As described in SEWPaC (2012) and Parks and Wildlife (2013) 'the main identified threats to Carnaby's cockatoo include:

- *Habitat loss and degradation, including the following:
...the removal of native vegetation corridors that connect breeding and feeding sites,
...Loss, degradation and isolation of night roost sites and surrounding feeding or watering habitat'. (15.9.6)*

COMMENTS ON THE DRAFT IMPROVEMENT PLAN

Our comments on the Draft Improvement Plan will be made under the headings listed on the Commission's website: '59 Matters to be considered by the Commission' where these matters are appropriate to this proposal.

A: '59. Matters to be considered by Commission

(1) In considering an application for development approval the Commission is to have due regard to the following matters to the extent that, in the opinion of the Commission, those matters are relevant to the development the subject of the application —'

3. *(c) any approved State planning policy;*

Five relevant policies/frameworks/plans/bulletins are noted and each discussed.

1. State Planning Policy 2.8
2. Bush Forever policy
3. Framework for Perth Peel @ 3.5 million
4. Wesroc Greening Plan
5. Environmental Protection Bulletin No 8: South West Region Ecological Linkages

1.) STATE PLANNING POLICY 2.8

The Commission must take into consideration State Planning Policy 2.8 which states that *'Proposals or decision making should —*

(v) Proactively seek to safeguard, enhance and establish ecological linkages between Bush Forever areas...' (section 5.2 Local Bushland).

The RPH Shenton Park bushland links two Bush Forever sites, Underwood Avenue Bushland (Bush Forever site 119) and Shenton Bushland (Bush Forever site 218)

This SPP 2.8 is a WA State Government high-level strategic planning document applicable to the Improvement Plan and Scheme process that Landcorp has chosen as the controlling planning mechanism for this site. SPPs apply to Improvement Schemes via s 77 of the Planning and Development Act WA which requires the Western Australian Planning Commission, the planning decision maker for Improvement

Schemes, to have **due regard** to an SPP when considering any such scheme. This policy is one which is entirely 'relevant to the development the subject of the application.'

The Landcorp Draft Improvement Plan does not 'safeguard, enhance or establish an ecological linkage'. **Indeed the proposal is completely at variance to s 5.2 of SPP 2.8.** Bushland is not 'enhanced' by being mostly cleared and becoming 'managed parkland'. Nor is it 'safeguarded' or 'enhanced' or 'established' by being completely cleared as Landcorp proposed in its application to the Federal Department of Environment under the EPBC Act. Landcorp claimed that this complete clearing is put forward because of the precautionary principle, a bizarre and entirely misused and erroneous claim indicating a lack of understanding of the meaning of the precautionary principle.

Landcorp has been advised that both Carnaby's Cockatoo and the Forest Red-tailed Black Cockatoo use the dead stag trees in the bushland strip as from those high points they can see across areas. **Landcorp's response ignored this advice** and has stated that dead trees will be removed. (see following page)



Photo: Carnaby's cockatoo - a flock of 180 in RPH Shenton Park bushland on the west side of the Site: 27 February 2016. This flock was counted flying in to the roost site at Hollywood the previous night.

2.) BUSH FOREVER POLICY PERTAINING TO LINKAGES

This linkage is part of Greenways 19, Bush Forever, which is about 'Keeping the Bush in the City'.
'Where possible, greenway concepts should be incorporated into future planning proposals as part of the development of best practice planning and design solutions.' (Bush Forever Vol 1 p 39)

This whole of government policy on linkages has been ignored by Landcorp and must be fully addressed by removing all developments from the bushland linkage.

3.) FRAMEWORK FOR PERTH PEEL @3.5MILLION

The framework aims to

- *Protect areas with regional conservation and landscape values*
- *Encourage and guide increased connectivity between open space or conservation through an integrated green network*

Protection of this connectivity as we recommend complies with the Framework's aims for Perth and Peel @ 3.5 million. **Landcorp should be required to change their proposed Plan to comply with this Framework.**

4.) WESROC GREENING PLAN

'The plan is a strategic planning document that provides future direction for the comprising local governments to integrate the natural environment into the western suburbs.....The plan identified and mapped greenways and regional linkage areas required to connect remnant vegetation, coastal and riverine habitats and wetlands in a cohesive network. The plan prioritises linkages based on those that connect with significant bushland areas, have good potential for greenway establishment or bushland regeneration. (City of Subiaco WESROC projects)

Although the housing and development proposal was developed under an Improvement Scheme, and this Scheme prevails over the MRS and local planning schemes, it would be expected that Local Government plans would be at least given due regard. In particular the City of Nedlands requested that the bushland linkage be protected, revegetated and enhanced.

Landcorp has ignored this advice and should be required to change their Plan to respect this advice.

5.) ENVIRONMENTAL PROTECTION BULLETIN NO 8: SOUTH WEST REGIONAL ECOLOGICAL LINKAGES

This Bulletin was based on the '*South West Ecological Linkages Technical Report*' by WALGA's South West Biodiversity Project and DEC's Swan Bioplan, September 2009. The Environmental Protection Bulletin No 8 briefly considers the Swan Coastal Plain:

'However, elsewhere on the Swan Coastal Plain native vegetation is highly fragmented. Therefore the maintenance of conservation reserves and all existing bushland patches, and the strategic restoration of ecological linkage function between them is a priority.'

Landcorp should be required to revise its Plan to comply with Environmental Protection Bulletin No. 8

B: '59. Matters to be considered by Commission

12. (l) the compatibility of the development with its setting including the relationship of the development to development on adjoining land or on other land in the locality including, but not limited to, the likely effect of the height, bulk, scale, orientation and appearance of the development;

We accept the position of the state government with regard to residential infill and the need to create more residences through planning for and construction of high-rise buildings.

Former EPA Chairman Dr. Paul Vogel, said the city of Perth ‘*could grow without compromising biodiversity, water availability and quality, air purity and amenity – provided proactive strategies were put in place.*

We are at the cross roads. With most of the State’s population living in the Perth-Peel region - in one of the world’s 34 biodiversity hotspots - we must ask ourselves how we want our city to develop and what quality of life we want for our population.’

From our first meeting with Landcorp, we and other community members enthusiastically endorsed the planning promised by Landcorp which included protecting heritage buildings, developing on the cleared area of the site to the east of the bushland and protecting the bushland corridor. The Minister for Lands the Hon Terry Redman’s media release (23 May 2014) stated:

‘There is also recognition of the key biodiversity corridor, the bushland vegetation in the western boundary of the site, which will be largely retained as part of the development.’

The proposed development of the bushland strip by Landcorp with 5 multi-storied buildings within the strip and with the ‘good’ and ‘very good’ condition undergrowth reduced to cells, or completely cleared, completely contradicts this promised commitment and is totally unacceptable.

Landcorp and the state government are not concerned with ‘the compatibility of the development with its setting’ but with putting units in the bushland on the highest part of the site where good views are available’.

C: ‘59. Matters to be considered by Commission

14 (m) the amenity of the locality including the following —

i) environmental impacts of the development;

The Office of the EPA stated:

‘The woodland is in very good condition and provides an important linkage between Shenton Bushland and Underwood Avenue Bushland (both Bush Forever sites)’.

The OEPA advise that there is an area of approximately 2.5 ha of Banksia woodland located in the south west corner of the site. The woodland is in very good condition and provides an important linkage between Shenton Bushland and Underwood Avenue Bushland (both Bush Forever sites). Therefore, the retention of this vegetation in public open space areas on the site is supported.

The OEPA also notes that the proposal may result in the loss of habitat for Carnaby’s Cockatoo and the Forest Red-tailed Black Cockatoo. Planning for the site should therefore seek to retain as much cockatoo habitat as possible and consider offsets to mitigate any residual impact on the species. (WAPC MRS minor amendment 1293/57 July 2015.)

The setting of this development is a rare opportunity to build a large number of residences on the cleared part of the site that ‘*reflect the culture, history and existing landscape of the site....*’ (Media statement Hon Terry Redman 19/1/2016). The existing landscape includes the bushland on the west part of the site, our natural heritage. As to the effect of the height, bulk and scale, proposing four or five multi-storied buildings in the bushland is fiercely opposed. The UBC supports height increases on parts of the site other than the bushland area.

The purpose of protecting green corridors is for flora, fauna including invertebrates and fungi to maintain a genetic variability and to have a corridor to areas beyond. Corridors act as escape routes in times of

threat and for restoration after catastrophic events (fire, storms). Fairy Wrens, often observed on the site, need dense shelter as well as a breeding area of around 6 hectares. They 'seldom stray out into the open.' (Australian Museum.)

Both Carnaby's Cockatoo and Forest Red-tailed Black Cockatoo use the bushland for feeding and as a route from their roost sites in the morning and to return in the evenings. The Banksia, Jarrah, Tuart, Allocasuarina bushland including planted species such as Eucalyptus caesia, provides food for Carnaby's Cockatoo listed as 'endangered' and for Forest Red-tailed Black Cockatoo, listed as 'vulnerable'.

Both black cockatoo species roost around 1.4 kilometres from the RPH Landcorp site. Thus the RPH 3.4ha of bushland lies within 'critical habitat' of these roost sites and on these grounds alone must be retained as required under their respective Recovery Plans and under the EPBC Act as 'critical habitat'. The Carnaby's Cockatoo site is a major site (over 150 cockatoos roosting) and in 2015 over 400 Carnaby's roosted at that site at the peak. The highest number roosting was 445 on 8 April 2015 and the average number for April 2015 was just under 300 birds.

The Forest Red-tailed Black Cockatoo roost site at UWA Sports Park, Brockway Road, is the second largest site as described in the 2014 Great Cocky Count: second to Murdoch. 106 were counted in the 2014 Great Cocky Count.

DPAW's guidelines for Carnaby's Cockatoos in relation to major roost sites are that trees within 1 kilometre of the roost site are used as roosting habitat and feed trees within 6 kilometres of a roost site are feeding habitat.

Both species of black cockatoo have been seen mating within 2 kilometres of the RPH Landcorp site.

We have seen the effect on Carnaby's Cockatoo in the nearby Perry Lakes development. Rather than having a direct route from their evening drinking place at the Perry lakes East Lake to their roost site, multi storied units interrupt their flight path and they either have to fly north to go around the buildings or fly south to get to the roost site.

In his paper '*Additional counts and records of flock composition of Carnaby's cockatoo (Calyptorhynchus latirostris) at two overnight roosting sites in metropolitan Perth*' (PF Berry and M. Owen: Vol 27 no 1 The Western Australian Naturalist, December 2009), PF Berry concludes:

'The present indications are that the rate of clearing of native vegetation on the Swan Coastal Plain is adversely impacting survival of Carnaby's Cockatoo by depriving it of food resources. This effect could be compounded if recent proposals for large scale clearing of pine plantations, a major alternative food source, are implemented. The sub-population in the western suburbs is also facing continuous diminution of the remnant bushland on which it depends.'

This loss of habitat has continued to this day. The RPH Shenton Park site not only provides food for the two species of black cockatoo, but it allows them to progress through the bushland to other important feeding areas, such as Shenton Bushland and Kings Park to the south and south-east, and Underwood Bushland, Bold Park, Lake Claremont and coastal feeding grounds.

Lack of quality of environmental reports

We wish to object to the poor quality of the environmental reports done for Landcorp. A Landcorp officer stated that 'There are no animals other than birds at the site.' This is nonsense.

Advice from Research Associate Prof Ric How, WA Museum (pers. com. 12 February 2015)

I know the Cockatoos are the iconic taxon on which so much of the argument runs but natural areas are also critically important for providing so many of the ecosystem services that we rely on - but take for granted - as cloistered urban dwellers. In this vein, the whole biota, particularly the natural soil organisms and fungi, are so essential and to lose more areas to urban expansion instead of in-fill is a huge environmental concern.

Professor How also commented on the 3 species of reptile Landcorp's Environmental Consultant reported are 'possible' on the site: *Lerista elegans*, *Moretha obscura* and *Menetia greyii*. Another list had the Black Striped Snake and the Carpet Python as 'possible' (The Landcorp officer was not willing to give the name/s of the consultant/s).

Professor How's comment:

As for the reptiles, I believe that the list of three species provided to you is far from accurate. Any other area that size in an urban bushland should contain between 6 and 8 species of lizard, alone. However, it would be highly unlikely to retain either of the two snake species mentioned, although the Dugite and Jan's banded snake could possibly survive.

A trapdoor spider was listed as possible but it is 'confined to the Hills area'. However various other species of trapdoor spiders probably survive there' (Prof Ric How pers. comm.) In Underwood Avenue Bushland there are around 200 trapdoor spider burrows of possibly 5 species.

Emeritus Professor Don Bradshaw also commented:

'I have been approached by members of the Urban Bushland Council (UBC) regarding Landcorp's plans for the development of bushland between UWA's Underwood Avenue land and the recently-vacated RPH hospital site. Natural bushland in urban areas is critical not only for the preservation of native faunal, floral and fungal biodiversity, but it is also important for community health. It provides essential assistance to water filtration, groundwater recharge, nutrient decomposition and recycling, soil enrichment as well as carbon sequestration. These are environmental services on which urbanised peoples depend for their health and wellbeing. Their preservation and management is critical for the education of the next generation that is becoming increasingly detached from the natural environment and its significance.'

The PVG consultant stated:

During the site visit no evidence of Black Cockatoos having foraged on the site was observed.' (p 9 the Referral, point 2.6). **This is nonsense.** There are easily seen chewed off Banksia cones and seeds bitten out of Banksia cones in many places and these cones are newly attacked but also old ones are present. We have earlier and recent photographic evidence of both Carnaby's Cockatoos and Forest Red-tailed Black Cockatoos foraging in the bushland and both species have been observed foraging in the bushland on multiple occasions. From 2011 until the present day, the Red-tails have roosted around 1 kilometre from the site.

It is accepted by scientists, that Carnaby's Cockatoos utilise all available foraging habitat in the area of the Swan Coastal Plain.

Small bushland reliant birds

The bushland linkage is valuable for other species such as small birds, including Variegated Fairy Wren, and species which are disappearing from urban areas.

WA Parks and Wildlife recognises the need for greater protection of a number of small scrub

passerine species. These small birds are disappearing from urban areas. Some are solely dependent on bushland and the vegetation linkages between Bush Forever sites is critical to their survival and thus must be retained. (DPaW March 2015)

D: 59. Matters to be considered by Commission

18 (o) *whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved;*

As stated, Landcorp intends removing dead trees which are used for perching by Carnaby's Cockatoo and Forest Red-tailed Black Cockatoo and as a sighting point to other areas.

Landcorp advises that it will try to protect mature trees 'where possible.' This offers no guarantee that planning will avoid trees. Indeed the referral to the federal government's Department of Environment put forward the 'worst-case scenario' that the whole site will be cleared.

An example of Landcorp's lack of respect for existing trees, please refer to the Nursery site in Salvado Road, adjacent to the State Netball Centre, which is a moonscape.

We note that Landcorp had its hands tied in regards to the avenue of Queensland Box Trees because of the heritage listing of those trees. Heritage listing protects buildings and the box tree avenue, but our natural heritage, evolved over millions of years, is not protected. This is unacceptable.

A 50 million year old Banksia fossil has been found which does not differ from modern day *Banksia attenuata* flowering cones. We should be proud of our ancient trees and bushland and design around these assets.

E: 59. Matters to be considered by Commission

18 (p) *the suitability of the land for the development taking into account the possible risk of flooding, subsidence, landslip, bush fire, soil erosion, land degradation or any other risk;*

19 (q) *the adequacy of any proposed bushfire management measures;*

In 'Bushfire Management' (7.11 p 41 Draft Scheme Report), the bushland is designated 'Managed Parkland.'

Managed Parkland is not native bushland. Actions undertaken for the bushland to become Managed Parkland would include

- 'the understory reduced such that fuel load becomes low, less than 5 tph and
- Open spaces introduced' (p17 Bushfire Management Plan)

Were building to occur on the Site to the east of the bushland, and heights of buildings increased, there would be no need to destroy the bushland due to bushfire regulations. In Underwood Avenue Bushland to the north, the distance between proposed homes is the width of the 14m wide road with a further setback of 3 metres. Some of the homes directly fronting the bushland would have to have individual assessments to ensure 'a BAL-29 rating is achieved.' 'Where the road reserve is 16m wide, only 1 metre

setback on the frontage is required'. (p 25 Fire management plan – Lot 4 Underwood Avenue, Shenton Park.)

So if the same assessment were to be applied, and the bushland Site protected, a 17metre wide area between the bushland and the rest of the site would be appropriate. This 17 m could accommodate appropriate design features such as road, tennis courts etc.

F: 59. Matters to be considered by Commission

23 (u) the potential loss of any community service or benefit resulting from the development other than potential loss that may result from economic competition between new and existing businesses;

The bushland provides a community service or benefit in protecting the feeding habitat of endangered/threatened species to enable their survival into the future and to protect the continued use of the roost sites within 1.4km from the bushland site. It enables bushland resilience in the face of drying climate due to climate change and enables species and pollen to move through the landscape. Areas buffered by trees are cooler by many degrees.

Many Australian towns and cities still retain patches of bushland, often in narrow strips along creek lines, or in areas that have been set aside for non-residential purposes. Remnant bushland, even when degraded by weeds, disturbed by changed hydrology or previously cleared of large trees, provides vital habitat for a diversity of bush birds and native invertebrates and pollinators.

Increasingly citizens are becoming aware that having access to nature is good for our physical and mental health. With such an increase in population in the area due to this and nearby developments, it is so important to protect the areas of natural vegetation for both humans and species dependent on it.

'We are the last generation that can fight climate change. We have a duty to act.' (Ban Ki Moon, Secretary General of the United Nations)

CONCLUSION

1. The advice of many experts, state government planning and Bush Forever policies, and EPA advice, has been ignored by Landcorp in their Shenton Park draft Improvement Plan.
2. Clearing and development in any of the 3.4ha of the bushland linkage is unacceptable and should not be permitted as it is contrary to Bush Forever and to SPP 2.8 and to WAPC matters to be considered.
3. Landcorp should be directed by the WAPC to review and change their plans so that the retention, protection and enhancement of the whole 3.4ha bushland ecological linkage is incorporated into their Plan. It should also be featured as a community asset.
4. The advice of our community representatives and local residents given in good faith and in multiple sessions and processes during Landcorp's community consultation process concerning retention of the bushland linkage has been ignored by Landcorp. Landcorp has abused the

community consultation process and this is totally unacceptable. It is a failure in good governance.

5. Representatives of the Urban Bushland Council and the Friends of Underwood Avenue Bushland request the opportunity to meet with the WAPC and DOP officers to discuss these important matters of public interest. We may be contacted directly by phone at our office 9420 7207 or 9381 1287.

Yours sincerely

President
Urban Bushland Council WA Inc.

Convenor
Friends of Underwood Avenue Bushland

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