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To whom it may concern,

**Submission re Application for a Clearing Permit Advertised in *The West Australian* 29<sup>th</sup> June, 2009, namely:**

**Main Roads Western Australia, Area Permit, Lot 56 on Plan 6941 and Lot 47 on Plan 3217, Welshpool, City of Canning, Extension of Transport Depot, 2.2 ha (CPS3181/1)**

The Urban Bushland Council hereby presents a submission regarding the Application for a Clearing Permit described above.

The Urban Bushland Council had an interest in the larger 5-6 hectare block of remnant bushland of which the area described above was a part for many years. We have been dismayed to find that the larger portion of the bushland remnant lying directly to the west of the area described above has recently been cleared of all vegetation and that the 2.2 hectare area described above is all that remains of the larger block. The recently cleared block was rectangular in shape, of around 3-4 hectares in size, and its native vegetation was in very good condition.

The Urban Bushland Council has every reason to view any purported environmental assessment or review process relating to the protection of remnant vegetation in the Welshpool area with enormous scepticism. We will provide some context to this expression of dissatisfaction in this submission.

The UBC nominated the larger 5-6 hectare block of remnant vegetation, of which the area subject to the current clearing application was merely a portion, for inclusion in the Bush Forever initiative but our submission did not result in its formal recognition as a Bush Forever site. We saw no justification for this omission and still took the view that the site was important and that it should be protected.

The Welshpool/Kewdale industrial area has been very poorly served in terms of native vegetation retention and the UBC is very unhappy with the State Government's failure to recognise the environmental significance of numerous remnant areas in the district – most of which have now been destroyed. For example, the UBC was appalled when the Public Transport Authority was given permission to clear a magnificent wetland remnant within the Kewdale Freight Terminal and lying between Abernethy Road and the main freight line to Cockburn. This wetland of silty alluvial soil in an otherwise sandy context lay only a few hundred metres to the

north of the area subject to present Clearing Application and it too has been destroyed in the past 18 months. The UBC objected strongly to the process that lead up to the clearing of this remarkable site and only failed to lodge an Appeal against the granting of a Clearing Permit because of a very unfortunate confusion of E-mail addresses. We maintain that the Kewdale Freight Terminal site was not subject to a satisfactory level of assessment and consider the whole affair to be something of a disgrace. Our representatives knew this area very well and the vegetation on this site was not only in excellent condition but also of a very distinct floristic structure that is typically found on the eastern side of the Swan Coastal Plain and which is generally regarded as having special conservation significance.

More than a year ago the UBC also objected to the clearing of a block of several hectares of native vegetation lying on the corner of Sheffield and Dampier Roads in Welshpool. We were advised at the time that no Application for a Clearing Permit had been received but we have received no further information. This site also had a considerable quantity of Aboriginal artefacts – as did some of the other sites in the area that have been cleared and filled.

Furthermore, some years ago, Main Roads Western Australia was given permission to construct an on-ramp between Abernethy Road and Tonkin Highway through one of the most intact wetlands at Perth Airport. This was despite the EPA recommending that the project not proceed. Within a relatively small portion of the Welshpool/Kewdale/Forrestfield area therefore, the State Government has failed to protect a single site among a number of sites the Urban Bushland Council has tried to have conserved over a period of some years. The UBC also made its views on the protection of these blocks known through submissions on such initiatives as the Kewdale-Hazelmere integrated Masterplan and the Draft Environmental Protection (Swan Coastal Plain Wetlands) Policy and Regulations 2004.

Given this background, the Urban Bushland Council has no real confidence that that the protection of significant remnant of native vegetation in this area has any priority at all with the State Government and takes the view that commercial, industrial and transport interests have totally dominated their considerations. This is an exceedingly regrettable state of affairs as the extensive bushland areas that provided habitat for a very impressive array of native fauna in the area right up to the early 1990's have been reduced to almost nothing. This is not development in any civilised sense of the term and our members who have known these areas for decades know how important they were for native birds and other fauna that are seldom seen in parks or gardens in the suburbs and which will now simply vanish from memory because they will not have the refuges and stopovers and feeding and nesting areas that they needed to survive. If destroying the city's natural and indigenous heritage were a laudable goal the State Government and its bureaucrats could use the Welshpool/Kewdale area as a showcase.

Although the area subject to the current Clearing Application is not large the UBC still objects strongly to the clearing of native vegetation and habitat in this area. This bushland would probably have had more conservation significance had the much larger contiguous area of bushland not been cleared in recent months but there is an argument that some bushland and habitat is better than none at all. Our members, who do not require a government grant or a pay cheque to visit these sites, have a strong appreciation of their special significance in providing habitat for native birds and other fauna in a sea of urban development. The bushland provides habitat for such fauna species as the Southern Brown Bandicoot and the Western Heath Dragon, although the recent clearing has made the maintenance of viable populations of such species more problematic.

It is our strong impression that the State Government planning authorities have no grasp of, or interest in, the importance of retaining wildlife habitat linkages and corridors in metropolitan Perth and the Welshpool experience conforms perfectly to this pattern. There are reasonably substantial bushland/wetland remnants at Perth Airport (BF Site 386), Dundas Road (BF Site 319), Hartfield Park (BF Site 320), Yule Brook (BF Site 387) and even to the west in Maniana (BF Site 283) but these sites are becoming more isolated and are rapidly losing all the smaller pockets and strips of bridging habitat that can facilitate natural genetic exchange between flora and fauna species and even basic access to these larger blocks for many species of fauna. Wildlife corridors with adjacent habitat remnants could have been established along open drains, sumps, and the railway reserves in this district but nothing has been done. There is some planted and remnant vegetation along such major roads as Tonkin and Roe Highways but of all the possible wildlife corridors main roads are among the least appropriate with problems associated with weeds, plant disease, litter, fires, and noise adding to the very basic issue of the mortal hazard posed by the fast-moving traffic itself.

If there is no alternative, road reserves are preferable to nothing in the way of providing linking habitat but the major Bush Forever sites are being ecologically marooned in suburban Perth and this is defeating their real purpose of protecting irreplaceable elements of the Swan Coastal Plain's natural heritage as the expansion of the built up environment proceeds. The false distinction set up between blocks of "regional" as opposed to "local" significance is providing the green light for the destruction of smaller bushland remnants throughout Perth but it will have disastrous ecological consequences that are way out of step with the expectations of the community. Many native bird species are declining on the Swan Coastal Plain and this is almost certainly due to habitat loss and urban encroachment. And the setting aside of isolated patches of bushland, even if they are relatively large, will not save such species if they cannot readily traverse the intervening spaces. Many native bird species are extremely reluctant to enter developed areas of the city and would only be preyed upon or starve if they did. Habitat corridors along drains or railways can facilitate their movement between larger blocks if there are also pockets of bushland available within which they can temporarily shelter, rest or feed along the way.

This is the ecological function that we see being realised in remnants of the type subject to the Application for a Clearing Permit addressed here. This patch, including some banksia woodland transitioning to dampland heath with emergent paperbarks, can provide habitat for fauna moving along the railway and drain reserves nearby to bushland areas further afield. We would make the observation that virtually all of the remnant banksia woodland areas around this district, regardless of their size, are visited regularly and repeatedly in the winter months by Carnaby's Black Cockatoo for the purposes of feeding. This Endangered Species is progressively being robbed of its feeding areas on the Swan Coastal Plain and anybody with any observational skills at all would know the bird makes use of every patch of remaining woodland it can find during the cooler months. We are fed the line that the real problem this magnificent bird faces relates only to the availability of suitable breeding sites but with proposals to clear the Gnangara Pine plantation areas being seriously considered it is difficult to see how there will be sufficient food to sustain even declining flocks in the medium term. From our observation, even small suburban remnants of woodland appear to be significant for sustaining the existing flocks of Carnaby's Cockatoo and the UBC deplores the continued destruction of this Endangered species' habitat.

The UBC opposes the granting of a Clearing Permit for the 2.2 hectare block subject to the Application referred to in this submission and expresses its extreme disappointment at the recent clearing of the bushland of which it was once part lying directly to its west. There is a very unsatisfactory pattern of habitat destruction in this area and it has gone from being a stronghold for such species as the Southern Brown Bandicoot and an area extensive enough to support the

Black Gloved Wallaby to an area with extensive industrial development and almost no natural habitat remaining in less than two decades. This is poor planning and we support the protection of representative natural heritage areas in balance with some development rather than the total annihilation of the former. Small habitat remnants of the type subject to the Clearing Permit Application are important in their own right and for maintaining ecological links with larger habitat areas in the district and across the Swan Coastal Plain.

Yours faithfully

C Mary Gray  
President  
Urban Bushland Council