



9 May, 2012

Native Vegetation Conservation Branch,
Locked Bag 104,
Bentley Delivery Centre,
Bentley WA 6983
nvp@dec.wa.gov.au

Submission – Re Application for a Clearing Permit (CPS 4982/1) advertised in *The West Australian* of 23/4/2012

Fire and Emergency Services Authority of Western Australia, Area Permit, Lot 10261 on Deposited Plan 215367-Reserve 37260, Forrestfield, **Shire of Kalamunda**, training facilities expansion, 0.199ha, (CPS 4981/1).

To whom it may concern,

The Urban Bushland Council presents the following submission with regard to the advertised Clearing Permit Application referred to above.

The Urban Bushland Council takes a close interest in Clearing Permit Applications potentially affecting bushland remnants in the Perth Metropolitan Area and has a special interest in natural remnants lying on the eastern side of the Swan Coastal Plain. The eastern side of the Swan Coastal Plain has been particularly heavily cleared, and in a natural state it exhibits a particularly rich biodiversity. Much of the remaining bushland on the eastern side of the Coastal Plain currently exists as relatively small fragments and as a consequence the UBC is concerned that these easily-overlooked blocks are not gradually lost over time leaving very little of this important ecological remnant as a whole.

The area to which this Clearing Permit Application refers is relatively small – approximately 0.2 hectares – but it is our view that its proximity to Bush Forever Site 319 (Dundas Road Bushland, Forrestfield) gives it a special significance. Here we are assuming the 0.199ha referred to in the Clearing Application is not quite within the boundary of Bush Forever Site 319 but if it is not within the boundary it is certainly very close to it. The UBC has not surveyed the site as it is our understanding from the aerial image supplied by the DEC on request that it lies within FESA's training facility.

It is our impression from the aerial image that at least some native understorey remains under the larger trees and shrubs and it is our strong view that reasonably intact bushland in such an environmentally significant area should not be cleared. Before Bush Forever Site 319 was so classified it was known under the System 6 regime as M53. The UBC has been pushing for the protection of Bush Forever Site 319 (formerly known as M53) for at least fifteen years and it still remains an area under threat from development proposals. We have members who knew this area very well before Tonkin Highway and Roe Highway was put through and before some of the light industrial and commercial developments that have diminished its environmental value were ever

established. It has always been a superb natural area but it has not been appropriately protected at all. It is our very strong view that the bushland in and around Bush Forever Site 319 has been chiselled away enough – way too much in fact – and the relatively small parcel of land subject to the Clearing Application, being directly adjacent to Site 319, should not be cleared.

The extensive list of environmental values attributed to Bush Forever Site 319 in Volume 2 of the Bush Forever Document *Directory of Bush Forever Sites (2000)* could be said to apply to the remnant subject to the Clearing Permit Application in that the latter is effectively just a subset of the former. It may or may not include the rare and endangered species but in biological terms it is inseparable from the larger block.

It is our view that clearing the 0.99ha parcel of land would contravene the following principles:

(a) Native vegetation should not be cleared if it comprises high level of biodiversity - refer to Bush Forever 319 *Directory of Bush Forever Sites (2000)*. This Bush Forever Site exhibits particularly high floral diversity and we see the area subject to the Clearing Permit as being effectively part of the larger block.

Therefore the proposal is at variance with Principle (a).

(b) Native vegetation should not be cleared if it comprises the whole or part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia – the block would in all likelihood provide habitat for the Quenda. Bush Forever Site 319 is well-populated with this marsupial.

Therefore the proposal is considered at variance with Principle (b).

(c) Native Vegetation should not be cleared if it includes or is necessary for the continued existence of, rare flora. We do not know if such rare species as *Conospermum undulatum* and *Macarthuria keigheryi* occur in the block subject to the Clearing Permit Application but these and numerous *Priority species* do occur in Bush Forever Site 319.

Therefore the proposal is potentially at variance with Principle (c).

(d) Native vegetation should not be cleared if it comprises the whole or part of, or is necessary for the maintenance of a threatened ecological community. Bush Forever Site 319 contains the Critically Endangered Floristic Community type 3a and the Endangered Floristic Community types 2 and 20a. It is quite possible that the block subject the Clearing Permit Application forms part of one of these Floristic communities.

Therefore the proposal is possibly at variance with Principle (d) and this should be assessed on site by a DEC botanist before this proposal is considered for a clearing permit

(e) Native Vegetation should not be cleared if it is a significant remnant of native vegetation in an area that has been extensively cleared. There is no doubt that Bush Forever Site 319 is a remnant of native vegetation that has been extensively cleared and that the block subject to the Clearing Permit Application is effectively a subset of Bush Forever Site 319. It makes no sense to divide such high conservation value remnants into component parts for the purpose of deciding which bits are expendable as it simply detracts from the value of the whole. Notably it is Bush Forever policy that there is a presumption against clearing on the eastern side of the Swan Coastal Plain and this should be applied in this case.

The proposal is seriously at variance with Principle (e).

(g) 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. If the block subject to the Clearing Permit Application is not part of Bush Forever Site 319, it does serve as an addition to what is a regrettably small reserve. Being slightly separate from the Bush Forever Site it might serve as a small but valuable fire refuge if the larger remnant were to be burned out. Thus loss of this area will have an impact on Bush Forever site 319.

Therefore the proposal is at variance with Principle (g).

The proposal is in our view at variance with six Clearing Principles and should therefore be totally rejected.

In summary, it is the view of the UBC that the block subject to the Clearing Permit Application should not be cleared and that FESA should take some responsibility for protecting and improving its environmental values. We would expect the DEC to investigate the values of the block in some detail before making any decision with regard to the Clearing Permit Application.

Yours faithfully

Urban Bushland Council WA
ubc@bushlandperth.org.au
PO Box 326, West Perth WA 6872

COPY