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d.newsome@strategen.com.au

CPS 2017/7872

Prime Eglinton Pty Ltd/Residential Development/19 (Lot 6) Taronga Place, Eglinton/Western Australia/Residential and commercial development on part 19 (Lot 6) Taronga Place, Eglinton, WA

This proposal is a controlled action due to threats to listed threatened species and communities (sections 18 and 18A).

The threatened species and communities on which the Urban Bushland Council will comment are Banksia Woodlands of the Swan Coastal Plain, Tuart Forest, Carnaby's Cockatoo and Forest Red-tailed Black Cockatoo.

The Urban Bushland Council WA opposes this development proposal for the following reasons;

1.) Loss of further Banksia Woodlands of the Swan Coastal Plain

- Banksia Woodlands of the Swan Coastal Plain were listed as in danger of extinction. This effectively means no more clearing of Banksia woodlands. This proposal by Urban Quarter for residential and commercial land uses proposes 'the clearing of up to 120 ha of native vegetation, as well as the retention of no less than 8ha of native vegetation.'
- Up to 42 ha of Banksia Woodland TEC is proposed to be cleared.
- The proponent's consultant Strategen, states that 'a significant portion of this 120 ha is regrowth' and the argument put is that as the average species richness (ASR) was 24.0 as opposed to the ASR of FCT 24, with a species richness of 38.9, 'the majority of the vegetation of the site is therefore not a high quality representation of the FCT.' (p7 Referral) This however is in contrast with the information in Table 5 (p8 Referral), where under 'Condition' the consultant states;

Vegetation condition of patches ranged from Good to Very Good - Excellent (Keighery 1994)..... The Banksia woodlands within the proposed action area are in a Very Good - Excellent (26.54 ha), Very Good (10.59 ha) and Good to Very Good (12.16 ha) condition,. comprising a total of 49.29 ha.

- The argument that 'surrounding vegetation and conservation reserves that contain more intact Banksia woodland in better condition' and therefore the loss of Banksia Woodlands on the site will not impact on the overall conservation status of the community types, is flawed. (p 10). This approach is part of the reason that Banksia Woodlands of the Swan Coastal Plain are endangered. Clearing is of course the main factor in our Banksia Woodlands being in danger of extinction.

2.) Carnaby's Cockatoo

The proposed area 'includes 18.96 ha of Excellent foraging habitat, 19.19 ha of Good to Excellent quality foraging habitat, 48.41 ha of Good foraging habitat 20.19 ha of Poor quality foraging habitat and 25.88 ha of very Poor to nil quality habitat for Carnaby's Black Cockatoo.' (p 12)

Also: '*Approximately 132.64 ha of Carnaby's Black Cockatoos habitat occurs within the proposed action area, of which 87.86 ha is considered good to excellent quality foraging habitat and 44.78 ha is considered of limited quality*' (p 13).

The Referral also gives the extent of clearing of Good quality habitat (66 ha), Moderate to Good (19.19 ha) and Moderate quality habitat (48.41ha, that is 79 ha in total of quality foraging habitat. This advice is put against the Referral Trigger of 'Clearing or degradation of more than 1ha of quality foraging habitat'.

From results of the 2017 Great Cocky Count Report 'there is strong consistent evidence that the population of Carnaby's Black Cockatoo inhabiting the Perth-Peel Coastal Plain is experiencing an ongoing decline.'

Clearing of Carnaby's habitat is one of the main reasons for the decline and this proposal is an example of what is happening all over the Swan Coastal Plain. Carnaby's Cockatoos around the northern areas of the Plain are also having to contend with the harvesting of pine trees at the Gnangara Pine Plantation at the rate of 1,000 ha per year. Within seven years at the rate of clearing pines, all that habitat will have been destroyed without revegetation having occurred. Protection of native bushland sites such as the Eglinton site and other bushlands is really critical to arrest the decline.

The community is captivated by these iconic birds and want more than extinction of the species.

3.) Forest Red-tailed Black Cockatoo (FRTBC)

The consultant notes that *Allocasuarina fraseriana* is a food plant of FRTBC (p 13) and certainly FRTBCs are now enthusiastically eating the seeds of this tree in Kings Park and in Underwood Avenue Bushland. This species is listed as occurring on the site in vegetation type EdBa. FRTBC also feed on introduced Eucalypts, *Euc decipiens* and *Eucalyptus gomphocephala* (Tuart) (personal observations in Underwood Avenue Bushland), and considering the spread of FRTBC onto and over the Swan Coastal Plain, the UBC considers that FRTBC could feed in the area. The precautionary approach is recommended.

4.) Tuart Woodlands

Tuart Woodlands are proposed to be listed as critically endangered and are currently being considered. A 'patch' of tuart may be a few mature trees or a slightly larger patch of non-mature tuart trees. Tuart trees are listed as being present on the site and must be respected and retained.

Conclusion

The proposal is a controlled action due to threats to listed threatened species and communities. The UBC considers that proposals such as this one, contribute to the loss and potential extinction of our precious species and communities. Urban sprawl is not a necessity and must

not be at the expense of valued species and communities. We must stop proposals that contribute to extinction by saying no to such proposals.

Yours sincerely,

Secretary

President

Urban Bushland Council WA Inc.
PO Box 326
West Perth WA 6872

cc epbc.referrals@environment.gov.au

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