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20 August 2018

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Shire of Serpentine/Jarradale

**Byford Local Development Strategy (Draft District Structure Plan) Discussion Paper  
- Hames Sharley. May 2018.**

The Urban Bushland Council WA is the peak community organisation for urban bushland recognition and protection.

The Urban Bushland Council is aware that the time limit for comment on the Byford Local Development Strategy (Draft District Structure Plan) Discussion Paper has lapsed but request that the Shire considers this letter.

The UBC's concern is that Bush Forever sites, all environmentally sensitive areas, are protected and that further incursions into these sites is not considered. Bush Forever is a comprehensive, world class plan for the protection of our state's unique biodiversity on the Swan Coastal Plain – including the eastern side of the Plain. The implementation of Bush Forever is incomplete and some of our irreplaceable natural assets of flora, fauna and vegetation systems are at risk. We look to local governments protecting the scarce natural areas that remain.

The UBC has concerns about some aspects of the Byford Local Development Strategy (Draft District Structure Plan Discussion Paper) regarding the Bush Forever sites in the Shire of Serpentine Jarrahdale. Page 33 of the Draft Byford Local Development Strategy states that:

*'Within the BDSP there are large amounts of area classed as Bush Forever, State Forest or native vegetation. Due to this, consideration has been given to the impact development within the BDSP may have on these bushland areas, especially Bush Forever areas. More detailed negotiation on any areas to be retained or removed will occur during the rezoning and local structure planning stages.'*

It is our view that the landscape and natural areas must be respected in the first instance when developing District Structure Plans, and for that matter, in the wider arena in planning for the Perth and Peel areas.

**Eastern side of the SCP**

*'Brickwood Reserve lies on the eastern side of the Swan Coastal Plain in a region that has been extensively cleared. Over 96 percent of the Ridge Hill Shelf (Foothills) and Pinjarra Plain soils in*

*the Shire have been cleared, and little of the remaining vegetation is in good condition'. (Statement in '4.7 Biodiversity')*

Advice from the EPA, July 2015, is that 'Foothill (Ridge Hill Shelf) has only 1% of this complex secure for conservation. ('EPA Interim strategic advice of the EPA to the Minister for Environment under section 16(e) of the EPAct 1986.')

The draft District Strategic Plan states that the vegetation condition of most of Brickwood Reserve is 'in very good or excellent condition' so this site, the other Bush Forever sites in the Shire, and the local reserves as well as the Conservation Category Wetlands must be held in the highest regard and given protection.

The Draft Report continues:

*'A study by Keighery and Trudgen (1992) concluded that too little of the vegetation of this section of the plain remained to adequately conserve representative types' (page 22)*

This does not mean that this remaining vegetation complex is now so small that it is not worth protecting.

Rather as stated in the document 'A Floristic Survey of the Southern Swan Coastal Plain' by Gibson N, Keighery B, Keighery G, Burbidge A and Lyons M, 1994, one of the recommendations is:

*'As a consequence of the small amount of remnant vegetation on the eastern side of the plain, all such remnants in the study area with the basic vegetation intact or able to be regenerated are of high conservation value.'* (p ix)

The Bush Forever sites and natural areas held by the Shire of Serpentine/Jarrahdale are areas to be proud of and the UBC encourages the Shire to not make any incursions onto them that will compromise their persistence into the future.

Thankyou

Secretary  
Urban Bushland Council WA Inc.

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