



30 December 2018

Department of Water and Environmental Regulation
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Dear Sir/Madam

Clearing Permit Application 8271/1 for 0.116 ha in Road Reserve between 171 West Coast Highway (Lot 91) and Crown Allotment Lot 21 on 221021 Reserve no. 46248.
The site is within the City of Stirling

The Urban Bushland Council (UBC) objects to the granting of a Permit in any form. Notably this area of land is in Bush Forever site 308 which means it is an ESA, and on these grounds alone should not be issued with a Clearing Permit.

Further it is unacceptable for Norup Wilson to be seeking approval for an unnecessary firebreak in the Esplanade Road Reserve with clearing and modification of a natural dune swale in this land adjacent to their property in order to justify future building under bushfire risk guidelines. The low native plant cover is of low flammability. The dune swale is an integral part of the natural dune formation at north Scarborough and should be protected as such with no alteration.

Please note that the Esplanade Road Reserve - part of which is the subject of this Clearing Permit Application - is now in the process of being transferred to the adjacent 'A' Class Reserve number 46248 - which is consistent with its status as part of Bush Forever site 308. Indeed, comments on this transfer of the road reserve is due on the same date (2nd January 2018).

Our comments under the Clearing Principles are as follows.

'Native vegetation should not be cleared if –

(a) It comprises a high level of biological diversity

The area proposed for clearing comprises a complex dune ecosystem of varying levels possessing a transition of native flora with dune elevation and position. This coastal geomorphology is complex and thus diverse. The detail of this complexity is described in the attached document:

'Assessment of the coastal dunes between Scarborough Beach and Trigg Island'.

The proposal is to clear 4 metres into the developer's land and up to 25 metres into the Reserve. Notably this would disturb significantly further into the Bush Forever site due to edge effects and changes to the dune profile.

This coastal dune vegetation type is already under-represented in conservation tenure, thus no further loss or degradation should be permitted.

The proposal is thus at variance to Clearing Principle (a) and the permit application should be refused.

(b) it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia

The area provides very important habitat for seasonal movement of fauna, such as small insectivorous birds, along the coast. It is also habitat for resident small lizards, reptiles etc that inhabit the coastal dune ecosystem. Clearing and disturbance will remove and degrade part of this

fauna habitat and also reduce its connectivity across the landscape.
Thus the proposal is at variance to Principle (b).

(e) it is significant as a remnant of native vegetation in an area that has been extensively cleared

There is very little coastal dune vegetation remaining in the region and thus there should not be any further incursions into it. The proposal would have an impact significantly further into the Bush Forever site due to edge effects and the proposed changes to the dune profile. Therefore the proposal is seriously at variance to Clearing Principle (e) and thus a clearing permit should be refused.

(f) it is growing in, or in association with, an environment associated with a watercourse or wetland

The proposal site is in association with the ocean which is a wetland. While there may not be a significant impact on the ocean, the interaction between the ocean and the coastal dunes may be very significant. Loss of dune vegetation weakens the dunes resistance to changes and erosion from storm surges and strong wind events. The west coast is well known to be a very active coastline. Thus all remaining dune vegetation should be retained and protected.

The proposal is at variance to Clearing Principle (f)

(g) the clearing of the vegetation is likely to cause appreciable land degradation

It is critically important that all remaining coastal dune vegetation is retained without change so that it protects the coast from erosion and degradation. Any removal of dune vegetation, levelling and other changes will alter and accelerate the pattern of wind erosion along the coast. It is a highly active coastline and even small disturbances will have a significant impact in the area and in down wind areas.

Thus the proposal is seriously at variance to this principle and a Clearing Permit should be refused on these grounds alone.

(h) the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area

The area itself is part of a Bush Forever site. The clearing and edge effects would have a very significant impact on this conservation area which is indeed a Bush Forever Area.

It is totally unacceptable for a Local Government Authority or landholder to be seeking to clear and degrade part of a publicly owned Bush Forever Area. Any adjacent developments on cleared land should be set back from that adjacent native vegetation to provide necessary buffer zone as required to reduce fire risk. Any clearing, partial clearing or clearing of understorey or levelling will have a significant impact on this conservation area of a Bush Forever site.

Notably the coastal native dune vegetation is not an extreme fire risk area, and should not be burnt or pruned or disturbed. It has not burned in living memory according to local residents. There is no requirement under Bushfire risk for clearing this area and this approach cannot be used to justify clearing.

Thus the proposal is seriously at variance to Clearing Principle (h) and should not be granted in any form.

Conclusion

The proposal is at variance to 6 of the Clearing Principles, is in an ESA, and therefore it is strongly recommended that no Clearing Permit be granted.

We submit that using bushfire risk to attempt to justify clearing *on a neighbouring property* is not applicable and is totally unacceptable.

Chairperson, Urban Bushland Council WA Inc.

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