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**CPS 8448/1 North Walpole Road Reserve Shire of Manjimup  
Proposal to clear no more than 50 trees and 1 ha (reduced from 10 ha)  
Road widening by 1 metre on both sides of the road for 4.6 kms ‘for road safety and upgrade’.**

The Urban Bushland Council WA Inc. submits the following Appeal against the above proposal.

The assessor determined that the proposed clearing is

- at variance to Principle (f) (watercourse)
- may be at variance to Principle (h) (impact on environmental values of any nature reserve) and
- is not or not likely to be at variance to the remaining principles. (a), (b), (c), (d), (e), (f), (g), and (i).

<b>Principles</b>	<b>Clearing permit decision</b>	<b>UBC position</b>
(a) Diversity	Not likely	
(b) Fauna	Not likely	At variance
(c) Threatened flora	Not likely	
(d) TEC	Not likely	
(e) Area extensively cleared	Not likely	At variance
(f) Water course or wetland	At variance	At variance
(g) Land degradation	Not likely	
(h) Nearby conservation area	May be at variance	At variance
(i) Surface or underground water	Not likely	
(j) Flooding	Not likely	

**Grounds of appeal**

**1.) There are alternatives to making the road safer for the driving community, other than the proposed clearing.**

This application for clearing up to 50 trees along and on both sides of the North Walpole road is another example of the sacrifice of wonderful trees that are of benefit to the community and to wildlife. We emphasise that it is the driver of each vehicle who is responsible for driving safely. Dangerous driving is the risk. It is not the trees which are responsible.

The UBC notes that eight of the twelve submissions received when the proposal was first advertised on the DWER website, support the application stating that ‘*the road is dangerous and requires*

widening to ensure the safety of both local users that include trucks and school buses and tourists who visit Walpole.’ Of the four other submissions, the UBC believes that even if the Karri are not old growth trees, they are significant trees that provide benefits to the community, apart from significance in their own right. The roadside trees generally, are a tourist attraction, as stated. (‘Planning Instruments and other relevant matters’ page 7)

The UBC very strongly supports the ‘numerous alternative safety measures proposed’ by one submitter.

In the Interim Report ‘Inquiry into VicRoads’ management of country roads’ July 2018 (page 22) one of the contributors wrote:

*Ecological degradation is occurring under VicRoads through the removal of old and very old trees. In most cases in the country, this removal causes devastation of landscape, and death of animals reliant on these trees. Such removals cannot be replaced by planting. Old trees provide vast quantities of nectar and pollen for nectar feeding birds, mammals and insects.*

The UBC understands that roads in Victoria are different from those in Western Australia but we do urge the proponent and the assessor to put a value on roadside vegetation, not at the expense of road safety, but from the perspective of what can be done to make roads safer, without large-scale clearing.

The UBC is lacking confidence that the proponent would take the advice given on page 7: viz: ‘An avoid and minimise clearing condition will be placed on the Permit to ensure clearing of native vegetation is only undertaken once other alternatives have been considered’. This does not justify the clearing in this over-cleared landscape.

The applicant advises that ‘clearing of large trees will be restricted to those that only are deemed a risk to road user safety.’ We urge the applicant to first look at means whereby the road can be improved for safety without tree removal, and then to protect trees so that tree removal officers do not remove all trees along the line. As above, it is each driver who is responsible for safety on the roads, not the trees. Reduced speed limits could be applied.

The trees to be cleared are Karri, Jarrah, Tuart and Peppermint with ‘A high proportion of younger trees [occur] throughout the majority of the application area’. This does not lessen their biodiversity and landscape value and is not justification for their clearing.

The terminology in the following sentence from the Clearing Permit (DWER p4) could be better expressed: ‘...large mature growth trees were littered throughout the application area comprising of largely *Eucalyptus diversicolor* species with a few isolated *Eucalyptus marginata* and *Corymbia calophylla*. ‘Littered’ usually means rubbishy, untidiness. The word scattered is more appropriate.

2.) **(b) Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna.**

The Assessor states that the proposed clearing is not likely to be at variance to this Principle. The UBC does not agree with this assessment. Principle (b) includes the words ‘**or a part of**’ (significant habitat for fauna.) and we maintain that up to 50 trees and understory in part, are significant habitat for insects, reptiles and birds.

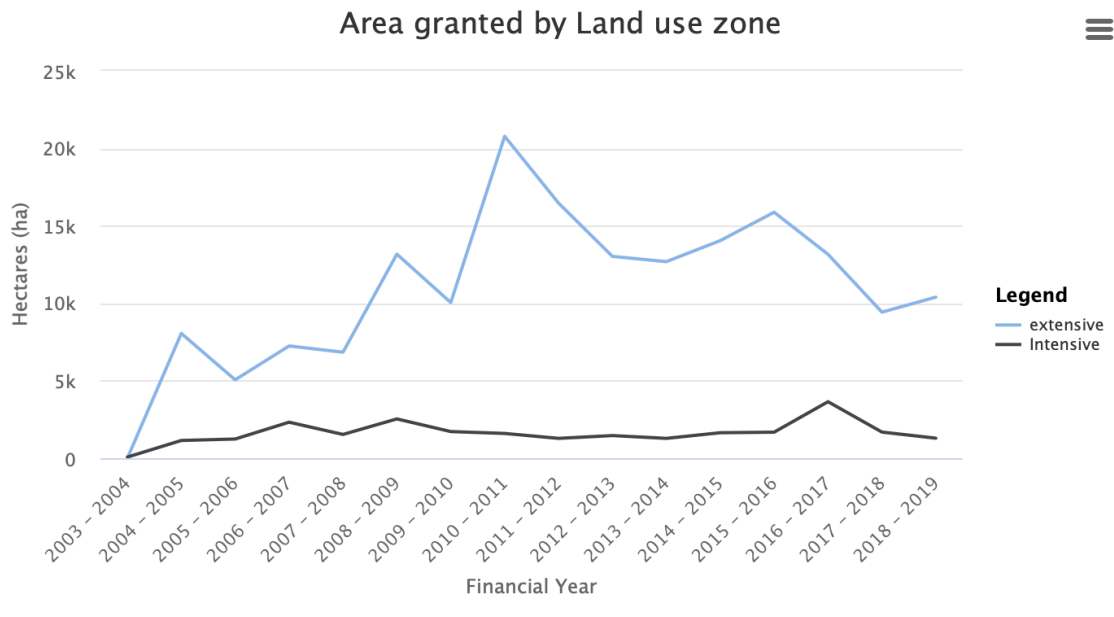
3.) **(e) Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.**

The assessor states that the proposed clearing is not at variance to this principle

The UBC does not agree with this assessment. The SW of Western Australia has been extensively cleared. *'The intensive land use zone is broadly defined as the south-west of the state which has experienced higher levels of historical clearing'* (Graph 4 DWER Clearing Statistics, see below)

#### 4. Areas approved for clearing - by land use zone

This chart shows the number of hectares approved for clearing within the intensive and extensive land use zones of Western Australia. The intensive land use zone is broadly defined as the south-west of the state which has experienced higher levels of historical clearing.



The UBC also notes that rural roadside trees and vegetation are being cleared piece by piece, with all the clearing adding to the cumulative effect. The fact remains that the south west is already over-cleared and as principle (e) states native vegetation should not be cleared in this case. We insist that this principle must be respected in the decision so that the clearing is not permitted.

#### The UBC agrees with the assessment regarding Principles (f) and (h)

##### Principle (f) UBC agrees with the assessment

The UBC agrees with the assessor and appreciates that as some (0.022 has) riparian vegetation is proposed for clearing, the proposed clearing is at variance to Principle (f). Therefore the clearing should not be permitted.

##### Principle (h), the proposed clearing may be at variance to this principle. The UBC agrees.

The assessor notes that in relation to Principle (h), the proposed clearing may be at variance to this principle. This is because 200m of the 4.5 km length is adjacent to the Mount Frankland South National Park. The UBC endorses this assessment.

## CONCLUSION

This proposal is one of numerous and continuing proposals for roadside clearing and the cumulative effect is a threatening process to native vegetation and species. We strongly reiterate that alternative solutions to roadside mass tree clearing be applied, particularly in the face of climate change, where our planet and the south west region is threatened.

Other states such as NSW and other countries in the world are able to protect roadside trees. We should too.

The UBC submits that our Appeal on three grounds against CPS 8448/1 be upheld by the Minister and that the Clearing Permit be refused.

Again, the UBC draws your attention to the article just published in the September 2019 issue of Kwongan Matters <http://www.plants.uwa.edu.au/alumni/kwongan> entitled 'Conservation Values of Road Reserves' by Graham Zemunik.

We would like the opportunity to meet with you to further discuss this appeal.

Yours sincerely

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