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Appeals Convenor
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**CPS 8150/1 Stratherne Road reserve, PIN 11542346, Shire of Cuballing
20 trees**

Dear Appeals Convenor

The Urban Bushland Council WA Inc wishes to appeal against the decision granting clearing permit, CPS 8150/1, Stratherne Road reserve, Cuballing.

The assessor determined that *'the proposed clearing is at variance to principles (e) and (f) and is not likely to be at variance to the remaining Principles.'*

The UBC submits that the proposal is seriously at variance to principles (b), (e), (f) and (i) and at variance to Principle (c) and therefore that the clearing permit should be rescinded. Apart from addressing our comments specifically on Principles (b), (c), (f) and (i), we make some further comments after statements on the Principles. We are very disappointed that the proponent is applying for continuing clearing permits when the Shire of Cuballing and Main Roads have been advised of methods available that will provide a public benefit including road safety, without the removal of trees.

CLEARING PRINCIPLES

(b) Native vegetation should not be cleared if it comprises the whole of 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 Principal. The UBC states that the proposed clearing is seriously at variance to this Principle.

Ecoscope notes that *'the application area comprises of suitable foraging habitat for black cockatoos.'*

Then Ecoscope notes that *'the extent is small and there is no evidence of foraging found' therefore 'the proposed clearing is unlikely to have a significant impact on black cockatoo foraging'. This fails to account for the cumulative effect of clearing piece by piece. Black cockatoos drink the nectar of flowering Eucalypts and eat the seeds of Allocasuarina spp. There may well be opportunistic feeding by black cockatoos at this isolated island of vegetation on the Stratherne Road.*

In addition, these trees would be shelter and islands of refuge for black cockatoos as well as other birds as they pass through the landscape. Some birds have a limited distance they will fly without cover, and the removal of most if not all of the trees is a significant threatening process to the ultimate survival of birds, including endangered species.

Birdlife WA has a brochure 'Birdwatching in the Central Wheatbelt.' 168 birds are listed in the species list from 21 reserves. Of course, not all these birds would be in the area, but the trees would be significant for many species.

(c) Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora.

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

The UBC considers that the proposed clearing is at variance to this Principle.

Eucalyptus wandoo

The UBC believes that there are numerous threats facing *Eucalyptus wandoo*.

There are many papers that discuss crown decline in *Eucalyptus wandoo*. Two examples are:
(1) PhD paper noting that ‘many exacerbating factors such as a warming climate, reduced rainfall, land clearing and competing land uses are ever present [as threatening processes to *E wandoo*] (Moore Tracey (2013) *Eucalyptus wandoo crown decline and its influence on wildlife*: Murdoch University)

(2) ‘*Eucalyptus wandoo*, endemic to south-west Western Australia, has undergone a decline in condition over the last decade.’ (CSIRO Publishing: Research article: Australian Mammalogy: Signs of wildlife activity and *Eucalyptus wandoo* condition. T. L. Moore, M. D. Craig, L. E. Valentine, G. E. St J. Hardy and P. A. Fleming.

A Wandoo Recovery Group (WA) was formed through the Department of Conservation and an action plan was developed to combat Wandoo crown decline.

The following information on *E wandoo* comes from Robert Powell’s book ‘Leaf and Branch’.

‘E wandoo supports a great abundance of insects and spiders, including native cockroaches, thrips, beetles and flies, both in the canopy and on the ground environment.’

‘Their [E wandoo] copious nectar is a good source of food for wildlife.’

‘Wandoo habitat is a particularly good habitat for birds. Not only is there an abundance of food in the form of invertebrates and nectar, but there are also numerous hollows for the various bird species that use them. The hollows are used by snakes, lizards and mammals’.

‘Since the late 1980s, the die back of Wandoo has occurred over a wider area than ever before, including much of the western wheatbelt.....over much of the large area affected they have continued to die back progressively. Apart from attack by insects and fungi, ‘They are suffering stress, probably as a result of a drying climate.’

The Department of Environment and Conservation in ‘EUCALYPTUS WANDOO (WANDOOO) WOODLAND’ states that, ‘on average, it takes 150 – 180 years for hollows to develop, although a hollow in a 100 year old tree has been recorded....Many birds, reptiles, mammals and insects use the hollows, bark and canopy of *E. wandoo*. (Hussey; Manning and White)’

As two of the *E wandoo* on Stratherne Road are reported as having hollows, these trees may be of similar age, that is from 100 years or greater. The loss of extent of Wandoo is now so serious that every remaining patch or individuals require retention and protection. Therefore the clearing should not be permitted.

‘(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 considers that the *‘Proposed clearing is at variance to this Principle’*.

The UBC submits that the proposed clearing is **very seriously at variance** to this Principle.

The assessor notes that the proposed clearing is within the Avon wheatbelt IBRA region (retains approx.1.5% of its pre-European vegetation extent and has 1.84% of extent in DBCA Managed Lands) and is also mapped as 1023 (retains approx.10.84% and 1.13% extent in DBCA Managed Lands). The wheatbelt woodlands are *critically endangered under the EPBC Act as less than 10% remains*. With a paltry 1.5% vegetation remaining in this seriously over-cleared landscape, it is of paramount importance that all remnants be retained.

‘Noting this and the cumulative impact of clearing within Stratherne Road reserve under CPS 7870/1, the vegetation proposed to be cleared is considered a significant remnant within extensively cleared area.’ This strong statement is then devalued by the statement: *‘An offset to conserve 0.37 hectares of Crown Reserve 2556 is considered to address the residual impacts to clearing a significant remnant in an extensively cleared area’*. This is nonsense. This flawed logic does not fit the process to allow the granting of a clearing permit.

There is no question that this proposal is very seriously at variance to Principle (e) and on these grounds alone this appeal should be upheld. Thus the clearing should not be permitted and Clearing Permit 8150/1 should be refused by the Minister.

The ‘offset’ of 0.37 hectares of Crown Reserve 2556, although calculated using the Commonwealth Offsets Assessment Guide, cannot be compensation for the loss of 20 trees - Eucalyptus wandoo and Allocasuarina spp. In addition, the shape and size of the ‘offset’ would not protect its qualities into the future should the surrounding vegetation on the Crown Reserve be cleared for gravel mining or for any other reason. The map showing the small amount of ‘offset’ (Plan 8150/1 (b) on Lot 434 Plan 84296 in the Shire of Cuballing just illustrates the inappropriateness of the policy of offsetting.

The hierarchy of the policy is *Avoid, minimise and reduce the impacts and extent of clearing. Thus the avoid policy should have been used in this case.*

Principles (f) and (i) have connected issues: association with a water course and quality of surface or underground water.

‘(f) Native vegetation should not be cleared if it is growing in, or in association with, and environment associated with a watercourse of wetland.’

The assessor considers that the proposed clearing is at variance to this Principle. However, the assessor adds, *‘Noting the type and condition of the vegetation within the application area and the small amount of vegetation to be cleared, the impacts are not likely to be significant.’*

The UBC supports the assessment of variance to this Principle. Google maps shows that the water course is quite substantial. The proposed clearing of trees, and being aware that the proposed clearing is only one part of the clearing of Stratherne Road and other roads in the area, the impact on the vegetation associated with the water course, would be significant.

‘ (i) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water. ’

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 and believes that the proposed clearing is likely to be seriously at variance to this Principle.

As the Clearing Permit points out, ‘Groundwater salinity within the application area is mapped between 7,000 - 14,000 mg/l total dissolved solids which is considered to be saline and highly saline (Mayer, Ruprecht and Bari, 2005)’. (page 7) This salinity would have been caused by clearing in the wheatbelt so further clearing would not be indicated. Rather, extensive planting of trees to decrease salinity, would be indicated.

The following table clarifies the UBC’s position in comparison with the assessor’s position.

Principles	Clearing permit decision	UBC position
(a) Diversity	Not likely	
(b) Fauna	Not likely	Seriously at variance
(c) Threatened flora	Not likely	At variance
(d) TEC	Not likely	
(e) Area extensively cleared	At variance	Very Seriously at variance
(f) Watercourse or wetland	At variance	Seriously at variance
(g) Land degradation	Not likely	
(h) Nearby conservation areas	Not likely	
(i) Surface or underground water	Not likely	Seriously at variance
(j) Flooding	Not likely	

ADDITIONAL COMMENTS

- 1.) Although it is considered by the assessor that ‘upgrades to the road will provide a public benefit including improved road safety’ (p7 Clearing report), the assessor has not considered the public, tourism and environmental benefit provided by the roadside trees in an area that has been extensively cleared.
- 2.) The proposed clearing is acknowledged by the assessor as having ‘**significant residual impacts**’ and this is too important a matter to be mitigated or offset.
- 3.) We are in a climate emergency where the future of life on earth is threatened and transformative change is needed. For the first time in recorded history, levels of CO2 in the atmosphere have risen to over 400ppm, from 280ppm in the interglacial period. Trees absorb CO2 and the cumulative effect of clearing is significant.
- 4.) So little native vegetation in the wheatbelt remains because of the extent of clearing. There should be no further clearing whatsoever in the wheatbelt.
- 5.) Has it been demonstrated that that this section of Stratherne Road is unsafe? In searching for information about any road accidents occurring on Stratherne Road, the following from the Shire of Cuballing in the ordinary meeting minutes of 17 April 2019:

‘The draft 10 Year Road Construction Program includes:

- *Continue the widening program on Stratherne Road in 2019/20 year. Stratherne Road is currently a road of regional significance and eligible for State Roads Funding through the Regional Road group. This may change in future and therefore widening works should commence as soon as possible. **Applications for funding are a lessor priority than the Wandering Narrogin Road** and therefore the scope of works able to be completed will be dictated by the maximum grant available to Council. This amount is currently estimated to be \$150,944.*
- Upon completion of the widening program on the Wandering Narrogin Road, Council will commence a construct and seal program on the Congelin Narrogin Road in 2023/24. **This road is still seen as a greater priority than Stratherne road** and a larger amount of grant funding will be sought.

As stated in the minutes, although Stratherne Road is considered ‘currently a road of regional significance’, it is not considered a priority above the Wandering Narrogin Road.

The UBC argues that (1) the section of Stratherne Road to which the clearing permit applies, although narrow and in part tree-lined, has qualities that preclude danger to drivers viz: the change of vista with the presence of trees.

ALTERNATIVES TO CLEARING

The UBC is aware of alternatives that can be used to make a road safer. Some include:

- relocation of the road through adjoining land, thus avoiding any clearing.
- reducing the speed limit
- installing steel ropes and roadside barriers
- audible edge lining

The Wildflower Society of Western Australia Roadside Vegetation sub-committee in consultation with DWER has undertaken a pilot program with the Shire of Cuballing, looking for flexibility in the clearing envelope, identifying significant environmental values and trying to avoid them. (Eddy Wajon pers. com.23 May 2019). This proposed clearing is an example of environmental harm and a lack of appreciation of the value of our wheatbelt roadside vegetation.

In conclusion we submit that our Appeal against CPS 8150/1 be upheld by the Minister and that the Clearing Permit be refused.

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

Chairperson, Urban Bushland Council WA Inc