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### **CPS 9009/1 Peppermint Grove Road Shire of Waroona 5 trees**

The Urban Bushland Council WA Inc. appeals against the granting of a Clearing Permit for the destruction of 5 trees, Peppermint Grove Road, Waroona, CPS 9009/1 Shire of Waroona.

#### **Grounds of appeal**

##### **1.) Clearing Purpose is stated as ‘removing trees that lean toward the road’.**

The two photographs published, Appendix D, show upright trees that are not leaning towards the road. (Copies of trees photographed - Appendix D –and are on page 3 below on this document) Therefore, the purpose is wrongfully described.

The UBC appreciates that the delegated officer went to the site to assess the trees. The UBC accepts that the Road Safety Audit found that *‘the trees proposed to be cleared are in a “clear zone” on the outside of a curve and pose a risk to vehicle occupants in the event an errant vehicle leaves the road (Shire of Waroona, 2020)’*.

The UBC submits that it is very important that the trees are retained. We submit that alternative measures can be employed to protect drivers who may leave the road for whatever reason. The proponent would be very aware of the various measures that may be taken – wire rope barrier, steel barriers, and reduced speed limit for the applicable section of road for example.

##### **2.) Significant impact and ecological linkage**

In 3.2.1 page 4 of the Clearing Permit, it is stated that *‘The removal of five trees is not likely to impact significant habit for fauna and no fauna management conditions are required’*. It is also stated – Appendix A, p 5 *‘The proposed clearing area does not contribute to an ecological linkage’*. This is not correct as detailed below.

The definitions in the Clearing Permit (p 3) does not define ‘ecological linkage.’

The five trees that are the subject of the clearing application and approval would serve as a link between patches of vegetation and as stepping stones for fauna, in particular birds and insects. Carnaby’s, Baudin’s and Forest Red-tailed Black Cockatoos forage in the area. The closest breeding site of white-tailed black cockatoos is ‘approximately 2.7 kilometres to the north-west’. It is highly likely that the five trees would be foraged on by all species of black cockatoos as well as by other parrots and also nectar feeding birds.

Therefore the Permit should not be granted on these grounds alone as the trees provide foraging habitat in an area already over-cleared, and provide essential linkage for Black Cockatoos which need to have rest and food trees at least every 4 km

##### **3.) Vegetation Extent**

The Clearing Permit (p 6) states that of the Swan Coastal Plain vegetation extent is 14.85 % in DBCA managed land remaining post-European settlement, and that only 5% of the Bassendean Complex-Central and South remains protected in DBCA managed lands.

The following quote explains what happens when a vegetation community approaches or falls below 30% of its original extent.

*When a given type approaches approximately 30% of its original extent there is generally a rapid decline in the number of species that can persist in that landscape. This degree of clearing usually results in a highly fragmented landscape within which there are declining resources and a corresponding breakdown in ecological processes and functions (Smith and Sivertsen 2001, Radford et al, 2005, Fahrig 2003, Smith et al 2000, Fischer and Lindenmayer 2007, Possingham 2000, Andren 1994). When habitat becomes fragmented to this level the potential for extinction cascades becomes greatly increased and the spatial arrangement of patches across the landscape becomes critically important for maintaining biodiversity..... For these reasons 30% of original extent of vegetation types is generally accepted as a threshold figure **below which the clearing of native vegetation should not occur** (EPA 2006). '(South West Regional Ecological Linkages Technical Report WALGA, DEC September 2009)*

Whilst the removal of 5 trees may be seen as inconsequential, the UBC has seen many examples of roadside tree clearing and all these losses cumulatively contribute to loss of habitat and other values, including the influence of climate change. Such cumulative losses are unacceptable.

The Clearing Permit states that '*the local area (10 kilometre radius of the proposed clearing area) retains approximately 31% of the original native vegetation cover.*' It is quite possible that some of this vegetation cover is not protected and will be cleared. Also this is just a small portion of the area of native vegetation cover. The south west is well recognised as being over-cleared in its identity as a '*biodiversity hotspot for conservation priority because it is under threat.*'

### **Query**

The proponent, Shire of Waroona, states that the trees are mature *Corymbia calophylla*. (p4 Application form). The UBC is interested in and questions whether or not the trees are *Corymbia calophylla* as they do not look like Marri trees. See photos below. This should be checked and we would appreciate clarification of this information.

### **Conclusion**

Trees along regional roadsides should be valued and retained, and every effort made to seek alternative means to clearing that protect drivers. Drivers – not trees - are responsible for safe driving and staying on the road. Alternative means are known and are available.

Also roadside trees are a benefit to humans as they give aesthetic appeal to road users.

Protection of remaining roadside habitat is now essential habitat for native fauna as described and therefore the Clearing Permit should be refused.

Thus protection of the 5 trees and their habitat values are grounds for refusal of the Permit. Also safe roads can be facilitated by alternative means near the trees as described above.

Representatives of the Urban Bushland Council request the opportunity to meet with you to discuss this appeal.



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