

ONLINE CONSULTATION PORTAL: [Comment· EPBC Act Public Portal \(awe.gov.au\)](https://awe.gov.au)

Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601

Dear Officers,

SUBMISSION ON: EPBC Number: 2023/09530 – Sydney Street Subdivision – MNES

The Urban Bushland Council WA Inc. (UBC) is pleased to present this submission in response to your invitation to address the issues of relevance to us. The UBC is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity. <https://www.bushlandperth.org.au/>. We are a voluntary community association with an active membership of 90 volunteer groups (each with their own local membership from 10-165 individuals) and an additional 108 individual ‘supporter’ members – all with a common interest in conservation and protection of areas of urban bushland in WA.

UBC advocates to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our ‘Friends Groups’ and their many volunteers – from all walks of life ‘working’ to improve and maintain the health of patches of neighbourhood nature.

Objection to clearing Lot 420 Sydney Street

Is this a controlled action? **YES**

The “*vegetation condition was considered Very Good across the entire site, as species were present within each strata layer and minimal to no weeds were observed*” (page 23 Natural Area Holdings Pty Ltd © 2023) and it is highly biodiverse. Because of the impacts with loss of multiple significant and irreplaceable environmental values of the site, the proposal for subdivision and clearing for urban development is totally, environmentally unacceptable and must not be approved. In addition to the value of the natural biodiversity, the area has a number of ‘Matters of National Environmental Significance’ (MNES), the protection of which should take precedence over removal and loss.

Significant factors and potential impacts on:

- **Vegetation**
 - The Australian Government is party to the International Union for the Conservation of Nature IUCN (2022) COP 15¹, which has a target for 30% retention of native vegetation and for restoration of another 30%. This Agreement applies to all levels of Government – so it includes the Australian Government, the WA Government and the City of Albany in this proposal. On this basis alone, there should not be clearing of Lot 420 for urban development with clearing.

Instead, the whole of the biodiverse Lot 420 Sydney Rd should be retained, not

subdivided, and added to the Comprehensive, Adequate and Representative (CAR) conservation reserve system.

- The **WA Native Vegetation Policy**ⁱⁱ is to increase the extent of native vegetation – a net gain. This requires that intact native vegetation must be retained and protected. Lot 420 is dense, good condition, relatively undisturbed vegetation dominated by marri, jarrah, sheoak and Albany blackbutt trees. **The proposal is contrary to this policy and should be rejected on this basis alone.**
- The proposal will result in the removal of 338 habitat trees.
- The limited flora and vegetation survey (single autumn survey) is inadequate to provide a comprehensive picture of the plant communities and individual species. Multiple seasonal surveys are required.
- **Terrestrial fauna**
 - Lot 420 provides over 2.4ha of **critical habitat** for the endangered Carnaby's Cockatoo, the vulnerable Forest Red-tailed Black Cockatoo, endangered Baudin's Cockatoo and the critically endangered Western Ringtail (WRT) Possums. Clearing of any of this critical foraging, roosting, and/or breeding habitat is contrary to their Recovery Plansⁱⁱⁱ and conservation advices^{iv} and is unacceptable. **On this matter alone, the proposal for subdivision for urban development must not be permitted.**
- **Greenhouse gas emissions**
 - Clearing in Lot 420 will produce significant emissions and will reduce carbon sequestration.
- **Subterranean fauna (Land)**
 - What is the impact of removal of natural vegetation combined with soil, geology, and hydrological disturbances on subterranean fauna?
- **Terrestrial Environmental Quality (Land)**
 - What is the impact of the removal &/or disturbance of soil, mycorrhiza and associated hydrogeological and ecological processes that maintain the quality of land and soils – including for the adjoining natural areas?
- **Cumulative Impact**
 - Clearing and thus habitat loss and fragmentation is the main threat to the black cockatoos, Western Ringtail Possums, and other native fauna. Loss of habitat for these significant fauna species must be stopped. Cumulative impact by removal of individual sites will have a long-term impact on the survival of the black cockatoos and Western Ringtail Possums.
- **Ecological Linkages**
 - Del Marco *et al* (2004)^v; Molloy *et al* (2009)^{vi} and Zelinova (2019)^{vii}, (2020)^{viii} highlight the critical importance of ecological linkages and regional ecological linkages, not just between 'patches of bush', but ensuring there is also connectivity or 'stepping stones' between 'like patches of bush' eg granite outcrop to granite outcrop, wetland to wetland, coastal heath to coastal heath.
 - Using contemporary science for Endangered Carnaby Cockatoos alone, recent flock movement studies by Prof. Kristen Warren & colleagues, at Murdoch University's Harry Butler Institute and Keep Carnaby's Flying, clearly demonstrate Carnaby's rely on the patchwork of fragmented natural areas to move through the landscape.

Whilst they may not roost or breed on each patch – being able to fly across, forage, bathe &/or rest are significant contributions of each neighbourhood patch to the habitat needs of the black cockatoos.

<https://www.murdoch.edu.au/research/hbi/carnabys>

- Whilst focussing her thesis on the Perth-Peel Region, O’Donnell’s^{ix} research and analysis on the critical importance of ecological linkages to conservation management for biodiversity can be applied across all regions and vegetation complexes.

If we are to conserve biodiversity, planners and managers need to integrate, maintain, and manage natural areas in order to improve ecosystem resilience, prevent extinctions, embed nature in urban environments, and connect people to nature as outlined under the Aichi Biodiversity Targets (Department of Agriculture, Water and the Environment 2020). One way of meeting these targets is to endow natural urban areas with formal protection and to create ecological linkages between urban areas in order to improve their resilience. However, meeting both social demands and environmental needs is a complex task that requires planners to turn to the scientific community for tools and methods to facilitate this (La Point et al. 2015). Without adequately informed urban planning, unfettered urbanisation will continue to remove natural habitat whilst leaving smaller, disconnected patches incapable of supporting biodiversity (Kong et al. 2010)

- **Ecological resilience**

- Lot 420 is a 2.4ha rectangular block, with a good boundary to area ratio for nature conservation. This value is enhanced as it is not isolated but adjoins the larger area of bushland and together they are known locally as ‘Yakamia Forest’. The condition of the habitat, the collective size a fragmented landscape increases its natural value.

- **Offsets**

- The UBC does NOT support the concept of offsets.
- The current proposal of an area of bushland of reduced environmental quality (regrowth woodland), serves to demonstrate why offsets are not comparable to the high quality habitat under assessment. In addition, it will be of no use to the displaced native fauna.
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Conclusion

Subdivision of Lot 420 Sydney Road, Yakamia to allow for urban development with clearing of ~2.4 ha of very good quality native vegetation and the associated residential and transient native fauna is environmentally unacceptable under the Matters of National Environmental Significance (MNES) and each of the EPA significant factors as detailed above.

Clearing should not be permitted. It is not developable land.

It is therefore strongly recommended that the proposal in all variations be rejected.

Further, it is strongly recommended that all of Lot 420 420 Sydney Road, Yakami be acquired by the WA Planning Commission and then transferred to the Crown and added to the conservation estate as an ‘A’ class reserve for the purpose of conservation of nature.

Yours sincerely

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- ⁱ International Union for the Conservation of Nature IUCN (2022) COP 15 [Global Biodiversity Framework](#)
- ⁱⁱ Government of WA (2022) [Native vegetation policy for Western Australia](#)
- ⁱⁱⁱ WA Department of Parks and Wildlife (2013) Carnaby's Cockatoo (*Calyptorhynchus latirostris*) Recovery Plan <https://www.dcceew.gov.au/environment/biodiversity/threatened/recovery-plans/calyptorhynchus-latirostris-recovery-plan>
- ^{iv} Approved Conservation Advice for *Pseudocheirus occidentalis* (western ringtail possum) (s266B of the Environment Protection and Biodiversity Conservation Act 1999)
- ^v Del Marco A, Taylor R, Clarke K, Savage K, Cullity J & C Miles (2004) Local Government Biodiversity Planning Guidelines for the Perth Metropolitan Region. Perth Biodiversity Project, Western Australian Local Government Association. ISBN 0-9599319-3-7
- ^{vi} Molloy S, Wood J, Hall S, Wallrodt S & G Whisson (2009) South West Regional Ecological Linkages (SWREL). Technical report to WA Local Government Association and Department of Conservation and Environment.
- ^{vii} Zelinova R (2019) Maintaining ecosystem functions via ecological linkages. In: Lambers, H. (Ed) (2019) A Jewel in the Crown of a Global Biodiversity Hotspot.
- ^{viii} Zelinova, R (2020) Cockburn Community Wildlife Corridor proposal in the context of regional connectivity planning. An electronic copy can be provided.
- ^{ix} O'Donnell, C (2020) Evaluating connectivity and ecological linkages between Perth's protected areas to support biodiversity. Bachelor of Science Honours Thesis. Murdoch University. Part of NatureLink Perth project. An electronic copy can be provided.