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Thank you for the opportunity to comment on the Erindale Road Bushland ERD

No the UBC does not want its contact details to be confidential

ERD

1. Clearly state your point of view - See 'Introduction' below.
2. Reference source of your info – referenced within the text
3. Suggest alternatives - See 'Introduction' below.
4. A summary is not provided as areas are under headings.

INTRODUCTION

Erindale Road Bushland in its entirety must be protected and placed in the conservation estate of the State of Western Australia. The Urban Bushland Council request that the EPA acknowledge the uniqueness of our ancient bushlands and advise the Minister that Erindale Road Bushland must be protected as habitat for species and for future generations to have the experience of all its values.

Bushland policy for native bushland (SPP 2.8) includes the following advice:

'To protect and enhance native bushland with the intent of long-term protection of biodiversity and environmental values' (SPP 2.8 Bushland Policy Perth Metropolitan Region objectives).

'Failing to protect biodiversity can constitute a violation of the right to a healthy environment...' (United Nations Human Rights Global Assessment)

Referral to DCCEEW

The federal Minister determined that the proposal was a controlled action.

The controlling provision was 'listed threatened species and communities' – namely...

- Banksia Woodlands of the Swan Coastal Plain ecological community (Banksia Woodlands TEC) – Endangered
- Carnaby's black cockatoo (CBC) (*Zanda latirostris*) – Endangered
- Forest red-tailed black cockatoo (FRTBC) (*Calyptorhynchus banksii naso*) – Vulnerable.

Part 1 – The Proposal Goes Against Sound Planning Principles

UBC is fundamentally opposed to any development of this site based on sound planning principles and biodiversity conservation grounds. The two go hand in hand.

The ERD discusses land zoning and planning issues. Since these should be considered as part of the environmental impact assessment and the decision making process, UBC's submission begins with making

some comments on several key State Planning Policies highlighted in the ERD plus others that the EPA must properly consider in their assessment.

Consideration of these planning issues and policies are a key part to assessing the environmental impacts of the proposal – especially regarding land use at a regional scale with respect to biodiversity conservation.

The bushland does not need to be cleared

It is erroneous to assume that development on the site must happen and that any part of the bushland must be cleared to do so. The following statement in the ERD is not a fact and does have to be implemented: “Because the loss of 12.29 ha of native vegetation within the residential development envelope is planned and unavoidable to implement the proposal, the proponent has considered a range of measures to mitigate potential impacts.....”

If good planning and biodiversity conservation principles are followed, along with sustainable development practices, development can occur elsewhere and the loss of the woodlands can be completely avoided. The assessment of this proposal should determine that no development on this site is acceptable and instead this significant native vegetation should be conserved in perpetuity. Another yet to be proposed action can be created and implemented, such as selling the land to the government for conservation purposes.

Alternatives of conserving the entire bushland have not been properly considered (Section 1.2 Proposal Alternatives)

- The proponent has failed to present viable alternatives or options that could avoid all clearing and save the bushland in its entirety.

The ERD suggests that the proponent could have justified developing the entire development envelope for residential purpose due to the WA housing crisis (ERD pg 27). This is an unsubstantiated and misleading claim.

In 2022, the City of Stirling pointed out that it can reach its infill targets identified by the State Government in its planned areas – without developing lot 802. (Agenda of the Ordinary Meeting of Council 10 May 2022). In other words, the bushland can be conserved in its entirety.

At the ordinary council meeting on 10 May 2022, The City of Stirling Council voted not to rezone Lot 802 from ‘Public Use – Commonwealth’ to ‘Development’ zone. The reasons included the following:

- “The City of Stirling is identified to provide a minimum of 60,330 dwellings as its local government contribution to the infill housing targets for the Central sub-region, which is to be provided along urban corridors and around centres. There is sufficient capacity in the City’s planned areas to accommodate this demand.”
- Lots 802 and 803 meet the requirements to be classified as a Locally Significant Natural Area under the City of Stirling’s Local Biodiversity Strategy and hence are a priority for retention, protection and management.
- The proposed clearing is inconsistent with State Planning Policy 2.8 - Bushland Policy.

The Proposal fails to protect a Locally Significant Natural Area (LSNA)

The remnant vegetation on the site has been identified as meeting the requirements to be classified as a LSNA under the City of Stirling Biodiversity Strategy. LSNAs are identified for priority of retention, protection, and management.

The proponent fails to clearly demonstrate the detailed impacts to the community and the wildlife (including the negative impacts on the black cockatoos) and justify the clearing over 12 hectares of an LSNA.

The Biodiversity Strategy was written in 2010 so the estimate of native vegetation that has been cleared in the City is out of date in that document. It is estimated that over 94% of the native vegetation has been cleared in the City of Stirling to date [2018 Statewide Vegetation Statistics (formerly the CAR Reserve Analysis):Full Report 2018]. Hence biodiversity conservation now must be the highest priority in planning.

The ERD statement that the City of Stirling’s Local Biodiversity Strategy (CoS 2010) does not identify any of native vegetation as regionally significant or recommend that it should be conserved is also misleading. The

local strategy was written in 2010 and does not identify specifically every piece of land that is regionally significant. Yet its principles stipulate the importance of retaining bushlands such as Erindale Road Bushland:

Principle 1: All ecological communities locally represented must be protected to ensure retention in perpetuity

Principle 2: The conservation of locally significant natural areas is just as important as those that are regionally significant

Principle 4: The highest biodiversity value natural areas should be given greater conservation priority over other areas

Principle 6: The conservation of natural areas as a legitimate form of land use must be recognised to ensure protection of these areas

The bushland should be protected as part of a greenway between Bush Forever sites

The ERD erroneously states that *"according to Bush Forever (Government of WA 2000) and State Planning Policy 2.8 - Bushland policy for the Perth Metropolitan Region (SPP 2.8) (Government of WA 2010) all the native vegetation within the development envelope is considered locally significant (i.e. removal is generally acceptable) and there is no Government policy which recommends the land should be acquired, conserved and reserved in the MRS as Parks and Recreation."*

This is an incorrect and misleading statement. The vegetation is locally, regionally and nationally significant. Bush Forever and other state planning policies recognise that ecological linkages should be conserved (although not generally specifying the exact locations or legal mechanisms). These policies do not imply that removal is acceptable.

The Bush Forever policy states that *"...the consideration of the surrounding land uses and connectivity between [BushForever] Sites is important in the selection of conservation areas and the design of a conservation network."* (Bush Forever, Volume 2 Directory of Bush Forever Sites, 2000, pg 71).

Bush Forever (Volume 1, Policies, Principles and Processes, pg. 24) states that in decision making: *"Proposals likely to affect locally significant bushland should be considered under local bushland strategies. Local governments will be the lead agencies for the protection of locally significant bushland."*

The City of Stirling has clearly considered the proposal- identifying that this bushland is an LSNA that should be protected.

The entire site is a significant regional linkage

The ERD is incorrect and misleading when it states that *"At a local scale native vegetation within the development envelope does provide an ecological linkage function by providing potential movement corridors for fauna; however, the linkage value is likely to be limited given that vegetation in parts of the development envelope is separated from surrounding vegetation through existing roads and fencing."*

Erindale Road Bushland is a significant regional linkage which has implications under the Bush Forever Policy. Despite being fenced in, the bushland provides access to many animals, especially those that can fly-like insects and birds.

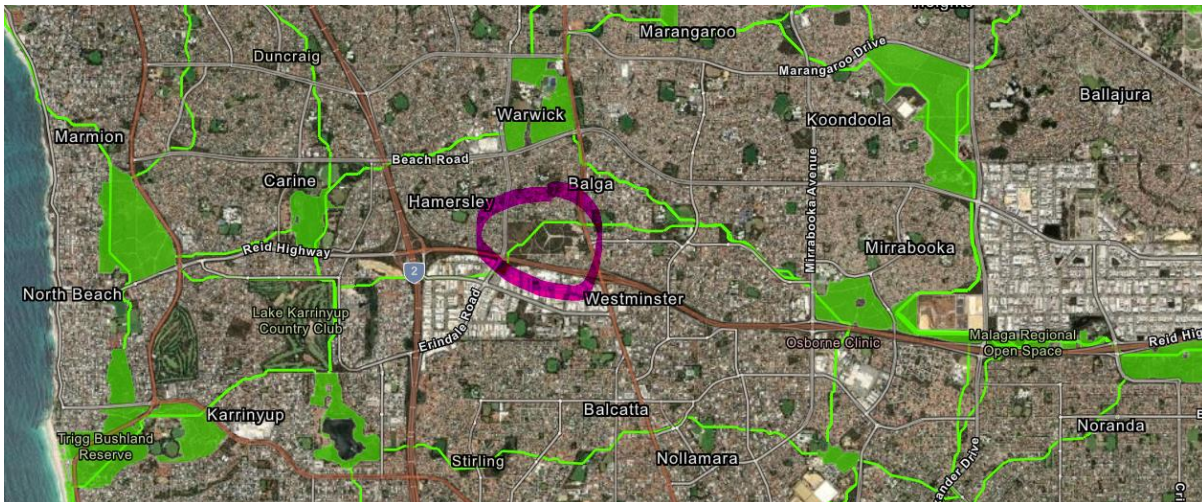
Bush Forever notes that *"Greenways are important features of the open space planning framework. They can serve to integrate open space planning at the regional and local level. Greenways link bushland remnants and are usually associated with bushland and wildlife corridors, actual or potential."* (Volume 1, pg. 31).

"Where possible, greenway concepts should be incorporated into future planning proposals as part of the development of best practice planning and design solutions." (Bush Forever, Volume 1, pg.32).

The proposal site was mapped in Bush Forever (Volume 2, Part A p. 72, 2000) as a Potential Regionally Significant Bushland Linkage connecting remnant bushlands and Bush Forever sites. Given the significant

amount of clearing in Perth over the past 25 years, the potential has been realised, and the linkage is now regionally significant. This linkage was mapped as part of the Perth Biodiversity Project as shown in Figure 25 of the ERD.

More recently, its importance as a regional linkage between Bush Forever Areas has also been mapped by Naturelink Perth. See excerpt of NatureLink map attached in which Erindale Road Bushland is centred. ([NATURELINKS | Naturelink Perth](#)) (See excerpt of NatureLink map attached.) The ecological function of the Erindale Road bushland site could be improved with good planning by enhancing the 'Naturelinks' between the site and Bush Forever areas nearby.



The proposed clearing will not safeguard and enhance the bushland as required by State Planning Policy 2.8 (Perth's bushland policy) cl 5.2(v)

The combined Lots 802 and 803 are clearly significant regional ecological linkages between adjacent Bush Forever sites.

Hence, the proposal for the bushland - clearing the entire Lot 802- is not compliant with SPP 2.8 cl 5.2(v) which requires that decision makers should:

"proactively seek to safeguard, enhance and establish ecological linkages between Bush Forever areas".

According to the Oxford Dictionary the meaning of:

- "to safeguard" is to: *"protect from harm or damage with an appropriate measure."*
- "to enhance" is to *"Intensify, increase, or further improve the quality, value, or extent of"*.

The latter definition implies that the underlying thing being enhanced remains intact or in existence. Destroying over 12 hectares of bushland is not leaving it intact.

The conservation of the bushland should also be a fundamental consideration as required by clause 2.1:

"The policy recognises the protection and management of significant bushland areas as a fundamental consideration in the planning process, while also seeking to integrate and balance wider environmental, social and economic considerations. In general terms, the policy does not prevent **development** where it is consistent with the policy measures in this policy and other planning and environmental considerations."

But contrary to the above:

The protection of this significant bushland has not been the fundamental consideration for the proponent. Instead, the proponent's fundamental consideration has been to obtain approval to develop the site for residential housing without offering viable options, e.g. to sell the land to the government for conservation purposes.

It seems obvious that clearing the entire bushland (Lot 802) and developing within it, is non-compliant with this policy for the reasons above. Summarising:

- the clearing negatively impacts the bushland's existing linkage function
- the regional ecological link is not safeguarded or enhanced- it is degraded and diminished
- the protection of this significant bushland has not been a fundamental concern of the proponent

The proposal is not consistent with the EP Act 1986 Objectives

The claim in the ERD that the proposal is consistent with the EP Act 1986 is not substantiated for at least 3 of the principles:

1. In the application of the precautionary principle, decisions should be guided by careful evaluation to avoid, where practicable, serious or irreversible damage to the environment. The proposal will have a significant and irreversible damage on the flora and fauna as described in this submission and in the ERD -resulting in a net loss and further fragmentation of Banksia Woodlands on the Swan Coastal Plain. An option of negotiating the sale of the property back to the government has not been proposed.
2. The proposal goes against the principle of intergenerational equity. Given the loss of 12 hectares of bushland in an area already severely depleted of native vegetation, the health, diversity and productivity of the environment will not be maintained and enhanced for the benefit of future generations if this project goes ahead.
3. The proposal also goes against the principle of the conservation of biological diversity and ecological integrity. Conservation of biological diversity and ecological integrity should be a fundamental consideration. Instead, the proponent has chosen to destroy what little is left of Bankia and Tuart Woodlands in the City of Stirling .

Summary:

More than 94% of the native vegetation has been cleared in the City of Stirling. The balance between the exploitation and the conservation of nature has been completely lost. Clearing over 12 hectares of a significant bushland will greatly diminish wildlife habitat, the wildlife population it contains, and the overall effectiveness of the area as a regional ecological linkage between Bush Forever Areas. The clearing of any of this land should not be supported.

Instead – both lots 802 and 803 - should be conserved and enhanced in their entirety. The land should be into the conservation estate and become a local or regional park.

The proponent could negotiate with the government to purchase the land at a reasonable rate and place a conservation covenant on it. This could involve departments such as WAPC, DPLH and/or Main Roads.

PART II

Environmental factor

Flora and Vegetation (Vegetation p 33)

Native vegetation. *'Our state's sustainable future requires that we address and reverse its decline'*. (WA Native Vegetation Policy May 2022)

The vegetation complex is 'Karrakatta complex-central and south' (ERD p 33).

The UBC disagrees with Emerge's statement (p ix ERD) that Karrakatta complex – Central and South vegetation complex, 'is well represented in the locality and region relevant to the proposal' because of its very limited extent and because 12.29 ha of native vegetation representing the 'Karrakatta – Central and South' vegetation complex will be permanently lost. (p ix ERD Emerge)

The City of Stirling's Local Biodiversity Strategy notes the target extent of vegetation complexes through 'essential criteria' and 'desirable criteria'.....

Essential criteria stipulates that at least 10% of the pre-European extent should exist whilst Desirable criteria requires at least 30% of the pre-European extent should exist. (p 82 City of Stirling Local Biodiversity Strategy)

The very low percentage of vegetation communities that remain, strongly demonstrates the importance of retention and protection... 'so that there is no further reduction to their current extent within the City.' (p83 City of Stirling Local Biodiversity Strategy)

There is only 1.8% of this vegetation complex left that is secure in the Perth-Peel Region compared with the original extent. (Perth and Peel @ 3.5 million – Interim strategic advice of the EPA - July 2015).

This advice from the EPA Chairman is now ten years old. It has proved difficult to find more current advice, but we would assume that the extent has not increased.

'Karrakatta Complex - Central and South' vegetation community is highly threatened, with reports indicating less than 30% or even as low as less than 5% of its pre-European extent remaining, making it a vulnerable ecological system in the Perth region. This classification highlights its critical conservation status, requiring significant protection efforts for the remaining patches of native bushland'.

No more must be cleared. Continual clearing, justified by offsetting, weeding or other means, is not acceptable as the end result is a net cumulative loss. Ultimate extinction could be the end as more and more bushland is cleared. The time gap associated with revegetation also is a threat.

VEGETATION CONDITION:

It is very disappointing that access to this bushland is denied. Had the Friends of Erindale Road Bushland been able to work in the bushland, bushland condition would have been improved. The difference in condition between JBS and G's 2023 assessment and Emerge Associates is surprising. The central area is buffered by good condition bushland around the edges. Again the community could have managed weeds after fire. The fact that the owner allowed the bushland to degrade after fire is an indication that the owner was not prepared to protect the bushland's values.

The UBC supports the advice on the indicative regenerated vegetation condition, which means if the bushland was managed appropriately, it would move up to the next condition level (p 42 ERD)

1.) Banksia Woodlands of the Swan Coastal Plain ecological community

This Banksia Woodland community is a Threatened Ecological Community, listed as endangered – that is in danger of extinction - under the Environmental Protection and Biodiversity Conservation Act 1999.

'The conservation objective for this community is to mitigate the risk of extinction, and help recover its biodiversity and function...' (p 33 Approved Conservation Advice for the Banksia Woodlands of the Swan Coastal Plain ecological community)

The Conservation Advice follows with the three key approaches:

- 'PROTECT the ecological community to prevent further loss of extent and condition;
- RESTORE the ecological community within its original range by active abatement of threats, re-vegetation and other conservation initiatives;
- COMMUNICATE WITH AND SUPPORT researchers etc....'

The Report states 'Actions inconsistent with these recommendation that are likely to significantly affect the ecological community should not be undertaken'. (p 33, UBC emphasis)

The City of Stirling notes that in all instances, where acquisition is warranted due to areas being recognised as having biodiversity values, 'The City will investigate options for a collaborative approach with potential stakeholders. viz. industry and other levels of government'. (p 92 city of Stirling Local Biodiversity Strategy)

The fact that three species of banksia are in the development area is important. Banksia attenuata and Banksia menziesii grow together but they flower and produce seeds at differing times. Banksia menziesii flowers from February to October, and Banksia attenuata flowers from October to February. Isn't that wonderful. Thus nectar, seed and insect feeding birds have food almost all year long.

Banksia prionotes flowers from January to August. This is why the three species of banksia are so important. This was recognised by the federal government assessors for the protection of Underwood Avenue Bushland in Shenton Park. (p 141 and 145 Perth Plants Russell Barrett and Eng Pin Tay).

The fact that three Banksia species exist in the proposed development area provides seasonal feeding opportunities for honeyeaters.

The Conservation Advice for Banksia woodlands of the Swan Coastal Plain ecological community is important:

'Prevent further clearance, fragmentation or detrimental modification of remnants of the ecological community and of surrounding native vegetation, for example, during residential development, basic raw materials extraction, and associated infrastructure development. High conservation value, unmodified and older growth areas are particularly important for retention and management.' (p34 Conservation Advice)

It is also advised that *'efforts should be made to increase the remaining extent, condition and landscape scale connectivity (including with other surrounding native vegetation types)* (p 34 *ibid*)

The EPA must recommend to the Minister that this proposal cannot be approved. The site is too important to be cleared. The proposed clearing does not align with the EPA principles and environmental factors – vi 'Flora and Vegetation', Terrestrial Fauna'.

The UBC has not addressed 'Greenhouse Gas Emissions' or 'Human Health'. The UBC has only commented on offsets in that any offsets could not mitigate or compensate for loss of this site.

Banksia attenuata woodlands over species rich dense shrubland (FCT 20a)

'This community is very restricted and the richest of any Banksia community located on the coastal plain.'(p 2 Threatened Ecological Community nomination form 2019). This community is very species-rich with an average of 67 species/100m². It is interesting that this community is present on Lot 803 and it is buffered by the bushland that is proposed for development. The greatest threat to its persistence is clearing and fragmentation. This includes *'clearing for urban developments, especially in the Perth metropolitan region....'* (p 30 Conservation Advice for Banksia Woodlands of the Swan coastal plain ecological community)

(This vegetation community is threatened by the City of Wanneroo in Landsdale, by burning on a 6 year cycle and by fragmenting the bushland/s).

Tuart Forest and Woodlands of the Swan Coastal Plain ecological community

This community is listed as a Threatened Ecological community at the level of 'critically endangered' under the EPBC Act 1999.

(<https://www.dcceew.gov.au/environment/biodiversity/threatened/nominations/comment/tuart-woodlands-forests-swan-coastal-plain>)

The condition of the patches of Tuart Forest and Woodlands, varying in size from 0.5 ha to 2 ha, are all in *'high' to 'very high' condition due to intact native understorey cover and moderate species richness...*' (p 44 ERD)

Emerge Associates seeming rationalisation of overlapping Tuart communities with Banksia communities TECs and PECs in no way diminishes the values of the site.

The impact of the loss of 3.63 ha of Tuart Woodlands in five discrete patches is significant and cannot be mitigated or offset.

Figure 13 ERD is telling in depicting visually that all of the four Tuart Woodland patches within the proposed development area and almost half of Patch 5 will be cleared if the proposal goes ahead. This is unacceptable.

Tuart trees are only found on the Swan Coastal Plain and have experienced an 80 - 86% loss. (2019 DCCEEW.gov.au National Threatened Species Scientific Committee). As Greg Keighery has described - Tuarts are wonderful trees – growing to an amazing height and old age (400 years and more) in the most infertile soil.

Tuarts are one of the Earth's rarest trees (p11: Irene Cunningham 'The Trees that were Nature's Gift')

Aboriginal people regarded old tuart trees almost as relatives. In the early days Aboriginal people typically camped beside large tuart trees, and today, all that remains of some of these camps are the old tuarts.

(Report on an Ethnographic, Ethnohistorical, Archaeological and Indigenous Environmental Survey of the Underwood Avenue Bushland Project Area, Shenton Park. Macintyre, Dobson and Associated Pty Ltd June 2002.)

The high visibility of the Tuart trees is likely to be a significant factor in maintaining the ecological linkage functions for the movement of birds through the area.

It is probably that Tuart in the proposed area is regenerating well.

Environmental factor:

Terrestrial Fauna (p 69 ERD)

The EPA objective for Terrestrial Fauna is:

To protect terrestrial fauna so that biological diversity and ecological integrity are maintained.

The ERD lists the points of residual impacts to terrestrial fauna habitat as follows:

- The permanent loss of up to 12.29 ha of banksia woodland habitat suitable for conservation significant CBC, FRTBC, quenda and trapdoor spider and potentially suitable for black-striped snake
- The permanent loss of up to 12.30 ha of potential foraging resources for CBC
- The permanent loss of 7.45 ha of potential foraging resources for FRTBC
- 41 potential nesting trees. (p vii ERD)

Carnaby's cockatoos use all the available foraging habitat on the Swan Coastal Plain, but even so there is a deficit, such that declines in population are continuing.

The UBC also notes that should animal species be moved to other areas, these other areas are probably already full - supporting as much animals as possible leaving no room for more. We have heard research that possums, if removed to an alternative site, try to return to their home territory.

- **Black cockatoo species – Carnaby's Cockatoo**

The UBC notes the 'historic surveys' relating to terrestrial fauna undertaken between 2017 and 2023 and the most recent assessment completed by Emerge Associates (2025a).

The GCC data consistently shows population declines, largely due to habitat loss from urban sprawl and land clearing,

Carnaby's cockatoos are reliant on all native food. There should be no further clearing of native bushland containing cockatoo native food and this is true of this proposal.

From the 2025 Birdlife Great Cocky Count 'a total of 15,786 white-tailed black cockatoos were recorded, with 6,298 individuals recorded on the Perth-Peel Coastal Plain...'

This was the lowest recorded total number of WTBCs since 2015, as well as the lowest recorded count for the Perth-Peel Coastal Plain...'

'The low numbers recorded this year, particularly for the White-tailed Black-cockatoos, is concerning.' (p 2 Birdlife Australia Cocky notes Issue 38 Spring.)

Merryn Pryor, the author of this preliminary Report ('2025 Great Cocky Count wrap up: low numbers a cause for concern'), suggests that the low numbers likely reflect a true population decline due to reasons might be the significant impact through harvesting of the Gnamptophaea-Pinjar-Yanchep Pine Plantations (loss of thousands of hectares of foraging habitat) and more recently widespread drought and heatwave conditions in southwest WA.

The third reason is that

‘the lower numbers are likely in part a direct measure of real population decline, following both a widely acknowledged poor breeding season, and an unknown amount of adult mortality due to starvation, as evidenced by Carnaby’s admitted to Peth Zoo in poor body condition between July and October.’

Research by Professor Kris Warren and team from the School of Veterinary Medicine at Murdoch University on Carnaby’s Cockatoo shows ‘a marked decline in population numbers. The result corresponds with the decline in foraging food, water, and roosting sources, as well as the increase in urbanisation’. (Long May They Grace Our Skies: Black Cockatoo Research and Conservation. Talk at Naturalists Club 30 September 2025)

The following quotes are from the same presentation.

‘Suburbs such as Clarkson, Butler, Alkimos have virtually no remnant bushland and there are no cockatoos there as the satellite tracking shows. There is a need to retain bushland areas + corridors+ Public Open Space with habitat trees’.

‘Carnaby’s are long-lived birds with few young so every loss is important.’

‘A key message is that we must not lose any more Carnaby’s habitat, and we must increase habitat trees in urban areas and in the south west region’.

Even when Carnaby’s are feeding on pine seeds or canola, they never use only these foods. They need to feed on native vegetation for the protein. If feeding on canola the cockatoos need twice as long feeding in native vegetation. (Professor Kris Warren, Murdoch University talk for Urban Bushland Council’s AGM March 2023)

Such is the concern about lack of food for Carnaby’s that a guerilla movement to supplementary feed Carnaby’s began in 2025. Supplementary feeding was operating in various suburbs and is believed to have increased the weight and health of the Carnaby’s to the point that they had good enough condition to migrated for the breeding season.

- **Forest Red-tailed Black Cockatoo**

As the ERD states, the residual impact on Forest Red-tailed black cockatoos is

‘the permanent loss of 7.45 ha of potential foraging resources for FRTBC, 41 potential nesting trees and the permanent loss of up to 12.29 ha of Banksia Woodland habitat.

A FRTBC roost site STIBALR001 occurs 200 m north-east of the site. The vegetation in the north-eastern portion of the site - within 500 m of the roost site - would be considered part of this roost.

The DCCEEW Forest Red-tailed Black Cockatoo recovery plan (2008) describes that ‘Habitat critical to survival and important populations of FRTBC comprises areas:’ (pp 12/13 DCCEEW Forest Red-tailed Black Cockatoo recovery plan)

- currently occupied by the cockatoos;
- not currently occupied by the cockatoos due to recent fire but capable of supporting cockatoo populations when sufficiently recovered;
- of natural vegetation in which the cockatoos nest, feed and roost;
- of natural vegetation through which the cockatoos can move from one occupied area to another; and
- of suitable vegetation within the recorded range in which undiscovered cockatoo populations may exist.

Like Carnaby’s Cockatoos Forest Red-tails range has contracted by up to a third. (birdlife.org.au)

2,095 FRTBCs were counted on the Perth-Peel Coastal Plain in 2025. The Birdlife Australia’s preliminary Report for the Great Cocky Count suggests that ‘the range of FRTBC may still be expanding on the Perth-Peel Coastal Plain’. The full GCC Report is yet to be released. Certainly, the distribution of FRTBC is changing, and the flocks are now reliant on food on the Coastal plain – which can be in direct competition with the Carnaby’s.

If clearing occurred, the red-tails would have less foraging habitat. Jarrah is a favourite food of red-tails (but not Banksia fruits as stated on Emerge's Appendix I. 4.1.2, page 17)

The clearing of the site will result in 'a significant residual impact'.

The UBC does not agree that the Offset Strategy and mitigation will counteract the loss of habitat. It certainly cannot compensate for the loss of the Tuart PEC.

Yellow-rumped Thornbill

The conservation status of this species is 'Least concern (population decreasing)'. This species diverged from within the thornbill genus 'just over 10 million years ago'. (Wikipedia: Yellow-rumped Thornbill).

It is of great concern that the population of this bird is decreasing. Yellow-rumped thornbills were present in Underwood Avenue Bushland from 2004 and nested in that bushland. However, there were no records of them in 2022 and 2023. It is now considered that they do not occur in Underwood Bushland. (Ian Abbott and Margaret Owen: Chapter 23: Change in avifaunal composition at well-studied sites. Underwood Avenue Bushland, Shenton Park)

Importantly, Yellow-rumped Thornbills still exist in Erindale Road Bushland. Photographs of Yellow-rumped Thornbills in Erindale Road were taken from the fence on 14 April 2024.

Reptiles: There is a strong positive correlation between the size of the bushland and the number of reptile species. Smaller remnants had fewer species surviving long-term. (WA Museum 'Vertebrate biodiversity in Perth's urban bushlands'). The number of reptiles will decrease if the land is cleared.

Residual Impact (p111 ERD)

The loss of up 12.29 ha [sic] of native vegetation will be permanent and unavoidable.

Emerge is correct in suggesting that there may be offset scarcity (p119)

The community has something very special, a public asset to cherish for the benefit it provides to communities and to health. The recommendation by the EPA to the Minister should reflect our respect for our wonderful bush.