

7 February 2020

Friends of Underwood Avenue Bushland



‘Native Vegetation in Western Australia’ issues paper.

[As well as direct clearing] *The cumulative impacts of multiple pressures means that much of our remaining native vegetation is also at risk.* (p2 Issues paper)

Preamble: Thankyou for the opportunity to comment on this issues paper and for the work done in preparing the paper. We appreciate the State government responding to the concerns expressed by stakeholders in 2018 asking for *‘improved transparency and consistency in how native vegetation is considered across government processes’*.

For years the community has been hearing and reading about ‘balance’ and to our great disappointment, Minister Dawson, Minister for Environment, Disability Services, Electoral Affairs, stated *“Our aim is to strike the right balance between protecting the environment and delivering a strong economic outlook – for now, and future generations.”* (Media statement 15 November 2019)

When development is approved in and through native vegetation that destroys and fragments it, the balance is gone. The state government’s aspirational aim of protecting at least 10% of each vegetation community, where 10% still occurs, does not mean that clearing can continue until we reach 10% left.

The extent of clearing is illustrated in these examples: Karrakatta Central and South vegetation complex, which is the vegetation complex for Underwood Avenue Bushland, has 1.8% left in secure conservation, compared to its original pre-European extent. Of the five vegetation complexes in the Spearwood dunes, four are under 10%, these being Cottesloe Complex Central and South 9.5%. Karrakatta Complex North 0%, Karrakatta Complex North – Transition Vegetation Complex 0.1% and the 1.8% already mentioned. The only complex over 10% is Cottesloe Complex North at 18.1%. So ‘balance’ has already been lost.

It is our view that the landscape must come first, and that planning and development is considered within that landscape in areas of already cleared or very degraded land.

Imagine a landscape of vegetated natural areas, including wetlands and rivers, connected with adequate green belts so that the benefits to plants and animals and for human and ecosystem health, exist.

Underwood Avenue Bushland is a key part of the greenway from the Swan River to the Indian Ocean. State government officers have stated that that bushland will never be developed for housing, but this opinion cannot be relied upon. The bushland condition is degrading due to lack of management by the owner, the University of Western Australia. The community strongly supports retention of the bushland and the community has 'willing participants to protect and restore native vegetation' but the University will not engage to enable the community to help.

The linkage of which Underwood Avenue Bushland is a critical part, is identified in the Capital City Planning Framework 2013 Support document as Target Area 1:

'Securing the remaining vegetation between BFS 218 and BFS 119 and improving connections to Bold Park and Kings Park, would improve the long term viability of all connected bushland areas'.

'.....further loss of vegetation in this area will result in significant change of connectivity status of BFS 119 and BRS 218 due to its proximity to Bold Park. However, loss of any part of this bushland would affect not only the viability of the BFS 119 but also BFS 218'. (CCPF support document p 18)

The Friends of Underwood Avenue Bushland has requested of the State Government that UWA is offered compensation for giving the bushland to the state for conservation. The protection of the bushland is of critical importance to threatened black cockatoos as well as many other species. It contains two TECs and it forms a key part of the green corridor.

Climate change

In the face of 'the tipping point' for climate change, our advice is to protect the native vegetation we have, including roadside vegetation and forests, and to manage it and enhance its capacity to survive into the future.

The future for adults today, their children and for future generations is very bad. As Sir David Attenborough commented *'The "moment of crisis" has come in the fight against climate change, warning that governments' targets for decades in the future are not enough to save the planet....This is an urgent problem that has to be solved. And what is more is that we know how to do it – that's the paradoxical thing – that we are refusing to take steps that we know have to be taken.'* SBS News 17 January 2020.

Modern humans evolved to breathe between 200 – 250 parts per million of CO₂ in the atmosphere and we are now at 410 ppm, with CO₂ increasing 3 to 4 ppm each year. *'Given that children are estimated to bear 80-90% of the burden of ill health caused by climate change, this issue is now one of the greatest problems facing the*

future of our species on this planet.’ (‘Climate Change and Future Child Health’ symposium held 1 December 2019 McCusker auditorium)

Bush Forever

There is no mention of Bush Forever in the issues paper. Bush Forever sites *‘are representative of regional ecosystems and habitats, and play a central role in the conservation of Perth’s biodiversity’*. (p viii Bush Forever Vol 1)

One objective of the Bush Forever plan is ‘

‘To bring greater certainty to the processes of land use planning and environmental approvals by the early identification and protection of areas of regionally significant bushland’. (p xiii Policy Objectives Bush Forever vol 1).

More than 50 year’s work of local, state and federal governments, and communities, programs, policies and strategies were brought together for Bush Forever to identify the Bush Forever areas, to identify protection mechanisms and for management of the sites. (p 15 Perth’s Bush Forever Report Card)

This aligns with the state government’s aims for ‘Native Vegetation in Western Australia’. As the Bush Forever plan already exists, we recommend that Bush Forever sites including their connectivity be embraced by the state government, celebrated and communicated to the wider community.

Development in and through Bush Forever sites is not supported. Examples are the Metronet line to Yanchep and the Thornley-Cockburn line, Satterleys’ housing development at Jindalee and clearing for the proposed Ocean Reef Marina.

Box 6 Proposed policy objectives and stakeholder perspective.

There are three policy objectives relating to native vegetation

- 1.) Management: Again the issue of balance is proposed. If our native vegetation is valued and protected from clearing, compromises will have to be made within the restrictions imposed by valuing it above other considerations.
- 2.) Conserved and restored. Supported
- 3.) Higher priority and strategic protection. The many risk factors for native vegetation means that no native vegetation is not at risk. Again the Bush Forever plan, if embraced can meet this objective.

Responding to the challenge (p 7)

The FUAB appreciates that the Issues paper cites that decline of native vegetation is a current trend that needs a solution. The fact that 93% of our original vegetation and that 97% of some woodland areas have been lost is an inditement on the WA and Australian community.

Is this not justification for the position that all clearing of Native Vegetation in SW Western Australia and in the wheat belt - heavily cleared areas – must cease.

The four initiatives suggested

1. A State native vegetation policy
2. Better information
3. Better regulation
4. A bioregional approach.

The FUAB has been unable to organise our comments under these four initiatives and for this we apologise.

Additional comments.

- 1.) Roadside clearing and clearing permits.** In a heavily cleared landscape such as in the Wheatbelt and the SW of Western Australia, roadside trees are often all that remain to act as corridors. DWER assesses applications for clearing permits for roadside clearing and often achieves a lessened footprint of clearing. However the applications are always approved, even when the proposal is a variance to some or many of the Principles. Appeals are a waste of time for the appellants and the Appeals Convenors and DWER officers who respond to the appeal grounds in writing. There are other ways of improving road safety without tree removal.
- 2.) Clearing permits:** The permits facilitate destruction of vegetation and habitat. If variation from Principles, or from a Principle, precluded development, this would be valuable and worthwhile.
- 3.) Threatened species and communities:** There are numerous threats to threatened and more common species as is known. Prescribed burning is one threat as demonstrated in the City of Wanneroo. Given that the City of Wanneroo was probably the recipient of Mitigation Activity Funds from the Department of Fire and Emergency Services, the City has commenced a destructive burning operation on a six-year rotation. Two thirds of Landsdale Reserve, Darch, has been burnt and this TEC 20a is probably wrecked. It was in excellent condition. Rufous Park is another example.
An ABC report, 5 February 2020 by Monte Bovell commented on photographs of an adult white-bellied Sea eagle and an adult male wedge-tailed eagle fighting over the same nest site. Nick Mooney, Birdlife Australia Raptor Group, said *'As we are losing habitat and the birds are losing their nesting spots, they are both having to argue over the same places'. 'When there is plenty of habitat available for them, they space themselves out and they don't have these intense conflicts so often. We are increasingly seeing the nature of intense competition actually ends up reducing breeding.'*
- 4.) Exemptions:** All referrals to Native Vegetation Protection officers to alert them to tree clearing, is met with the statement that that clearing is exempt. Exemptions need attention. Even a car park is considered a building and therefore exempt.
- 5.) Offsetting:** This is government policy but the result is a net loss of vegetation. Offsets for clearing roadsides are often pitifully inadequate. eg a long narrow strip of land. Offsets for University research projects to study threatened species habitat requirements for example, while habitat is destroyed is not supported.

- 6.) Tame environmental consultants:** This is a problem. Example: In our experience a consultant has said that there is no evidence of black cockatoos feeding here: when anyone on the site is tripping over the numerous chewed banksia cones.
- 7.) Loss of Gnangara and Pinjar pine plantations:** We understood that as pines were harvested, cockatoo food plants would be planted. This did not occur. As was stated in the Strategic Assessment, this loss of pines would lead to loss of 50% of the Carnaby's cockatoo population, after which numbers would stabilise. This was a shocking statement, and hopefully, under the Labor government, we are more enlightened. However, the cleared pine areas have not been replanted.
- 8.) Forests:** Forests need protection and the definition of 'old growth' redefined. Forests are habitat for species. Inform the community of costs of logging to assess whether clearing of forests is sustainable.

Thankyou again for the opportunity to comment. We see the future as being terrible so we urge you to allocate money to agencies and to support and employ enough staff and scientists to give us information, to have valuable sites managed, and to stop the loss of vegetation and habitat.

With regards,

Margaret Owen
Chair: Friends of Underwood Avenue Bushland.