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**Nature Reserves Preservation Group, Inc.**

Address: Office of the Appeals Convenor  
Level 22 Forrest Centre  
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Date: 18 July 2012

**TO: Minister for Environment**

**CC:**

Subject: **Appeal against granting of a clearing permit for  
bushland to north and west of Morrison Oval  
Hartfield Park. Clearing application CPS 41001/1.**

Minister,

The Nature Reserves Preservation Group (Inc.) wishes to appeal, under sections 51E(11) and 101A(4) of the Environmental Protection Act 1986, against the granting of a permit to clear the above area of remnant natural vegetation on the following grounds:

1. The preservation of remnant natural bushland vegetation is of vital environmental importance.
2. There are environmental problems and consequences should the clearing go ahead.
3. There may be better alternatives.

1. Pockets of remnant vegetation serve as vital elements of linkages, greenways and wildlife corridors and serve to enhance the local biodiversity. An assessment of the value of such areas frequently fails to acknowledge their value to bird and insect life. Despite degradation and lack of detectable DRF in this area (Bennett Environmental Consulting *Significant Flora Search of Three Area at Hartfield Park Forrestfield* November 2009) the survey found the nearby (< 300 metres) scout area to be of "very good quality" and to contain DRF. The scout area is currently linked with the target area through the remnant vegetation on the S.W. side of Morrison Oval. Should the clearing go ahead, it will leave this "very good quality" DRF pocket totally exposed on this side, to its detriment.

2. Within the Shire of Kalamunda there are Bush Forever sites which, through neglect are becoming increasingly degraded. Even in their degraded state, however, they still serve as linkages, greenways and wildlife corridors (see above) and preserve much of their natural biodiversity. Clearing such areas means the last vestiges of that biodiversity are lost. Through such clearing, areas of remnant vegetation are becoming increasingly isolated. In many cases this isolation leads to increasing extinction of biodiversity.

The creation of new sporting field areas places added pressure on the Shire to provide a new source of water - a huge problem given the current rate of declining rainfall and increasing pressure on groundwater resources.

3. The Hartfield Park Management Plan (1996), prepared by the Eastern Metropolitan Regional Council Environmental Service in association with the Shire of Kalamunda, highlighted the environmental sensitivity of Hartfield Park and recommended (under 1.5 Ultimate Development Plan) that no new sporting fields be constructed on Hartfield Park in areas containing existing bushland. It recommended the Dawson Avenue landfill site (Pioneer Park) be regarded as a first priority for sporting field planning for the area.

The Hartfield Park Sport and Recreational Facilities Master Plan Draft Report February 2010 suggested “ A more viable option at Hartfield Park for acquiring additional sporting field area would appear to be the conversion of the equestrian grounds to sporting fields...This would necessitate the relocation of the Darling Range Horse and Pony Club to a suitable venue, and require additional water supply for the irrigation of the increased turf area. [p.41]

In support of the above, the following points are raised:

- ‘Hartfield Park is classified Bush Forever and has a high conservation priority. It also has significant Indigenous heritage.’[Hartfield Park Sport and Recreational Facilities Master Plan Draft Report February 2010 ‘constraints’ p.1] and – ‘Hartfield Park Reserve is approximately 170 hectares in size of which a large portion is natural vegetation with very high ecological value.’ [ibid. p. 24]
- ‘The current ground water licence for Hartfield Park is fully allocated. Should the Shire decide to increase the amount of irrigated turf there will be a need to identify a new source of water for Hartfield Park that is sustainable in the long term, cost effective and is practical to implement.’ [ibid p.6.] and – ‘Most importantly, if permission is granted for clearing, the Shire will need to acquire a new sustainable water source for irrigating the additional fields as the current ground water licence for Hartfield Park is fully allocated.’ [ibid. p. 40]
- The State Strategic Policy Section of the Department of Planning does not support the proposed clearing and considers the use of the equestrian grounds for sporting fields to be a more appropriate action as outlined in the Shire of Kalamunda’s Hartfield Park Sport and Recreation Facilities Master Plan 2010

(Dept of Planning 2011). Additionally, the Bush Forever Policy aims to protect regionally significant native vegetation and has the key principle to avoid, minimize and, lastly, mitigate any necessary clearing within a Bush Forever area (Dept. of Planning 2011)

- In its submission on Town Planning Scheme 3 on 23/06/2005 to the Shire of Kalamunda, NRPG stressed the need for protection of areas such as this in the context of their value as wildlife corridors, greenways and natural areas linkages. “The NRPG supports the orderly taking of management vestings of reserves for inclusion into the District Conservation Reserve System and Wildlife Corridors...key areas where this needs to occur include, the natural areas and key wildlife corridor sections of **Hartfield Park**, Maida Vale Reserve, Ridge Hill Rd and Kadina Brook Reserves ...”
- As part of the recreation facilities master plan process, the Shire of Kalamunda engaged EDAW to undertake an environmental review of Hartfield Park. This report highlights the environmental and cultural sensitivity of Hartfield Park, its classification as Bush Forever, its declared and threatened rare flora, endangered floristic communities and its Indigenous cultural significance (containing within its bounds a scar tree site.) The park was formerly known as Maamba Reserve and was used as an Aboriginal camping site at the turn of the last century. The key finding from this report is that the potential for further clearing of bushland for additional sport and recreation facilities appears to be limited.

The offset proposal (Bush Forever site 45 Poison Gully ‘west’) offered by the Shire and deemed a suitable location by The Department of Planning, causes us to question the practical value of such offsets. The responsible authority should as a matter of course, budget for maintenance of such sites. We totally reject the principle of Bush Forever sites being used as offsets against vegetation clearing of other Bush Forever sites.

For over 20 years we have been fighting to retain natural vegetation within the Shire. In that time, Bush Forever sites have been allowed to degrade beyond the point of rehabilitation and therefore considered suitable for development. Keighery and Trudgen (1992) identified Hartfield Park as an area of “high conservation value.” Contrast this with the Bennett Environmental Consulting report (2009). Whilst still finding areas in very good condition and worthy of conservation, this report found the Morrison Oval bushland ‘degraded’ to ‘completely degraded.’ If ‘Bush Forever’ is to have meaning, we should not have to fight this battle again and again.

Yours faithfully,

A.J. Fowler  
Acting President  
Nature Reserves Preservation Group (Inc)

A duplicate appeal will be emailed to your office to avoid potential postal delays.