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**Nature Reserves Preservation Group
of Kalamunda, Inc.**

20 Jan 2025

TO: The Western Australian Planning Commission / Dept of Planning, Lands and Heritage: sdauconsultation@dplh.wa.gov.au

SUBJECT: Submission: Residential aged care facility at 20 Champion Road, Lesmurdie

The Nature Reserves Preservation Group of Kalamunda (NRPG) is a community organisation which has worked for over 30 years to preserve the natural areas in the local government of Kalamunda and its surrounding areas, which we recognize are incredibly biodiverse and globally unique.

The Perth metropolitan area has already lost much of its greenbelts and potential wildlife and passive recreation corridors, so the preservation of bushland and green open spaces is vital, particularly that with natural vegetation and or waterways/bodies, for the wellbeing of our native animals, birds, and mental health for humans.

NRPG comments are as follows.

Objection to unnecessary clearing of any bushland in the first instance:

While the NRPG acknowledges that this area is already zoned "Urban" in the Metropolitan Region Scheme, we oppose this development in the first instance, because there are few remaining areas of significant pristine bushland in the urban areas of Lesmurdie, and the City of Kalamunda in general.

Further it is widely acknowledged that our environment is in a 'dire state' from many threats, and the federal government has initiated Nature Positive and Nature Repair legislation to try to address this. The mature trees are of high value for habitat and food for endangered black cockatoos (currently facing starvation from loss of other food sources from land-clearing), phascogales and other animals. The proposed development will clear natural vegetation in 'excellent' condition, and should be preserved in its entirety, particularly as it is contiguous with the adjacent Over Avenue Bush Reserve, which makes it more valuable.

Instead, NRPG proposes a land-swap with an existing cleared or severely degraded area would give better environmental outcomes.

If the development proceeds:

Bushfire risk and mitigation issues:

As this is in a 'Bushfire prone' area, there may be a requirement to clear significant areas of surrounding bushland to achieve the necessary 'BAL' rating. The development application does not appear to account for the hazard reduction clearances required, unless the BAL requirements can alternatively be satisfied by fire-resistant building design. This clearing will affect not only the 'amenity' of living amongst nature, but may also have an impact on the adjacent Over Avenue Reserve, which would not be acceptable.

If the BAL rating requires hazard reduction into the reserve, then NRPG suggests that the development 'footprint' be reduced to give the required clearance without impinging on the reserve. This could be achieved by adding a third story, so that it can accommodate a similar number of residents, while potentially remaining low enough such that the surrounding trees can mitigate the 'overlooking' concerns of neighbours.

Mitigation measures to avoid degradation of natural bush on the site:

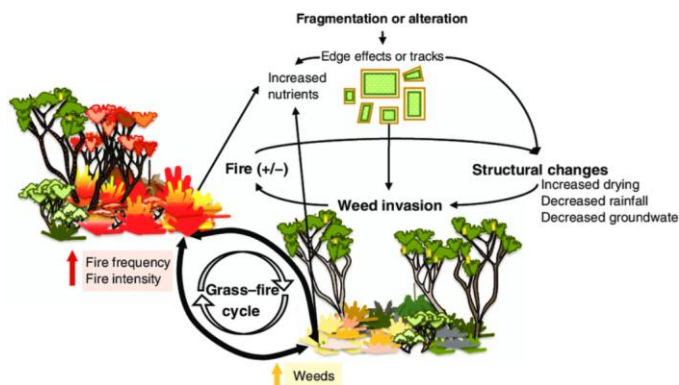
NRPG acknowledges and commends the development proposal for minimizing the removal of trees and vegetation and providing a natural amenity for residents. However, experience for many decades is that areas where humans interfere or interact with the environment, the bushland degrades over time with weed incursion, foot traffic, Dieback, predatory cats and rubbish.

It is frequently misconceived that trees are the only value of bushland, when in fact the most significant value is in the biodiversity of the native understory plants and flowers. These are very easily damaged and degraded by human activity, and therefore to preserve it for the enjoyment of the residents, it will be necessary to exclude humans from the areas that the development proposes to retain, or contain their movement to well-defined areas, such as by fencing etc.

Bushland in metropolitan areas typically contain a very large amount of weed seed in the soils, and as a result, degradation of bushland typically occurs in the following sequence:

1. Disturbance by foot or vehicle traffic, fire*, etc.
2. Weed/grass seed bank in the soil is stimulated (by disturbance) to germinate
3. Weed/grass out-competes native understorey plants, resulting in 'poor appearance' due to tall dead grass in summer, and presents a higher fire risk.
4. Fire risk mitigation measures of local Council regulations require cutting of all 'dead matter' to less than 5cm height, which is often misinterpreted as requiring cutting everything to 5cm, resulting in all understorey plants being cut or damaged.
5. Repetitive cycles of the above result in significant degeneration over time, often resulting in little remaining except weeds.

*The 'fire-and-weed cycle' disturbance is similar to that described at: [Banksia woodlands interactions diagram demonstrating the grass-fire cycle.](#) | [Download Scientific Diagram](#)



To prevent degradation of the surrounding vegetation:

- All walkways and other trafficked areas should be kept 'tight' around the complex, and fenced off, to minimize the impact on the bushland area.
- Plant local native non-invasive species as first choice, and particularly as a buffer between the complex and the surrounding bushland.
- If non-native species are planted, ensure they are non-invasive, and that there are native plant or other buffers to the bushland, to minimize the impact of edge effects such as weed invasion.
- It will be necessary to install fencing to protect the bush during construction, against disturbances of any kind.

Light pollution:

Native animals (and humans) are impacted by light pollution and as such this development should minimize the use of external lighting, and where used, should not 'spill' outside of the area of the complex itself. The Australian National Light Pollution Guidelines for Wildlife give guidance: [National Light Pollution Guidelines for Wildlife - DCCEEW](#)

Low-level bollard-type lighting or footpath lighting on automatic timers to turn off in the late evening, and/or motion-activated are potential simple solutions.

Sincerely,

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