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Nature Reserves Preservation Group of Kalamunda, Inc.

17 Dec 2025

TO: Environmental Protection Authority

SUBJECT: SUBMISSION – Lot 802 & 803 ERINDALE ROAD, HAMMERSLEY BANKSIA WOODLAND

The Nature Reserves Preservation Group of Kalamunda **objects** to the proposal to develop 13.55ha of Lot 802 and part Lot 803 of Banksia woodland at Erindale Road, Hamersley.

NRPG supports the Objection by the Friends of Erindale Road Bushland, summarised by the following reasons:

Threatened Ecological Communities

- The bushland contains Banksia woodlands of the Swan Coastal Plain, listed as a Threatened Ecological Community (TEC) under both the EPBC Act 1999 and the WA Biodiversity Conservation Act 2016.
- It also includes Tuart woodlands (Eucalyptus gomphocephala), a critically endangered ecological community under the EPBC Act.

Key Threats

- Urban development clearing is the greatest threat to Banksia woodlands.
- Only 24% of remaining Banksia woodlands are protected in reserves, making every remnant vital.
- Clearing Lot 802 and part of Lot 803 (13.55ha) would exacerbate habitat loss, fragmentation, and decline of flora, fauna, and ecosystem functions.

Biodiversity Value

- Supports endangered Carnaby's Black Cockatoo (CBC) and vulnerable Forest Red-tailed Black-Cockatoo (FRTBC).
    - Habitat loss has reduced cockatoo populations by over 50% in 200 years.
    - The proposal would permanently remove 12.30ha of CBC foraging habitat, 7.45ha of FRTBC habitat, and 41 potential nesting trees.
- Contains diverse flora: Banksia attenuata, Banksia menziesii, Banksia prionotes, Jarrah, Tuart, Xanthorrhoea preissii, and many others.
- Tuart woodlands support up to 800 invertebrate species and provide breeding hollows for birds, possums, and bats.

Ecological Connectivity

- The 42ha bushland (Lots 802, 803, Lot 1) is in good to very good condition and connects with Warwick Bushland and Carine Regional Open Space, forming a crucial wildlife corridor.

- Fragmentation reduces biodiversity, pollination, and seed dispersal, increasing vulnerability to weeds and feral animals.

Regional & National Significance

- Part of the South-Western Australian Floristic Region, one of only two biodiversity hotspots in Australia.
- Less than 20% of Tuart woodland remains.
- Nearly 90% of temperate woodlands have been lost since European settlement, with 30 native mammal extinctions.

Environmental Offsets

- **Offsets not acceptable**: Threatened Ecological Communities (TECs) cannot be offset, as this results in **a net loss of TECs on the Swan Coastal Plain.**
- **Policy breach**: WA Environmental Offset Policies and Guidelines specify offsets as a *last resort*. BAI Communications is using them as a *first resort* to justify clearing 13.55ha of native bushland, without attempting to avoid areas of high environmental value.
- **Tenure issue**: The proposed offset land would remain in **private ownership** and continue to be used for broadcasting infrastructure, rather than being transferred to WA's Conservation Estate for permanent protection.

EPA Guidelines

Intergenerational Equity

- The environment must be maintained and enhanced for the benefit of future generations.
- Retaining native vegetation is critical, especially in areas already heavily cleared.
- Lot 802 and part Lot 803 contain **Banksia and Tuart woodlands**, both listed as **Threatened Ecological Communities**.
- Clearing this land would undermine intergenerational equity, removing a high-value environmental asset that stores carbon and produces oxygen.

Conservation of Biological Diversity and Ecological Integrity

- Protecting biodiversity and ecological integrity is a fundamental EPA objective.
- Clearing 13.55ha of native flora at Lot 802/803 would destroy habitat for birds, insects, and reptiles.
- This biodiversity is **irreplaceable** and cannot be substituted, making preservation essential.

Social, Cultural and Health Values of Hamersley Bushland

- **Community Well-being**: The bushland enhances health and quality of life by offering recreation, amenity, and nature-based education, and fostering connections through interactions with bushland, native animals and birds.
- **Urban Cooling**: Through shade and evapotranspiration, the bushland reduces the Urban Heat Island Effect, lowering local temperatures significantly and decreasing reliance on air conditioning and electricity. This is particularly important in our drying and heating climate.

- **Tree Canopy**: The City of Stirling has only **12.4% canopy cover**, well below its **18% target by 2040**. Clearing the bushland would worsen canopy loss and contribute to Perth's status as the Australian capital with the lowest canopy cover.
- **Flood and Erosion Control**: Native vegetation reduces flooding, soil erosion, and contamination of waterways by limiting fertiliser and pollutant runoff.
- **Air Quality**: Trees absorb harmful pollutants (nitrogen oxide, ammonia, sulphur) and filter fine particulates from traffic emissions, crucial given the site's location near busy suburban roads.
- **Climate Change Mitigation**: Native bushland stores carbon, playing a vital role in slowing climate change, which the UN identifies as humanity's greatest threat.
- **Water Cycle Benefits**: Vegetation reduces evaporation and supports groundwater recharge, sustaining local hydrological balance.

First Nations People and Hamersley Bushland

The **Mooro Nyoongar people** traditionally lived along the lakes and wetlands of the Swan Coastal Plain, including Hamersley, prior to and during European settlement from 1829. They maintained strong connections to land through extended family groups and cultural practices such as song, dance, and fire management.

- **Lack of Assessment**: The Environmental Review Document by BAI Communications makes no reference to surveying or assessing the cultural significance of this intact pre-European bushland to the Mooro Nyoongar people.
- **Respect and Inclusion**: Their deep ecological knowledge and cultural ties to the bushland must be respected, and they must be included in decisions about land that has been theirs for thousands of years.

In summary, the NPPG urges this area to be placed into WA's Conservation Estate for permanent protection, and instead source or redevelop other already-cleared areas for housing.

Sincerely,

Steve Gates,

Secretary, Nature Reserves Preservation Group Inc.

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