



11 August 2023

The Director  
Ecological Communities section  
Protected Species and Communities Branch  
Department of Climate Change, Energy, the Environment and Water  
PO Box 3090  
Canberra ACT 2601  
Via email: [EPBCNOM@dcceew.gov.au](mailto:EPBCNOM@dcceew.gov.au)

### **Honeymyrtle shrubland on limestone ridges of the Swan Coastal Plain Bioregion**

Thank you for the opportunity to provide views on the assessment and draft Consultation Advice for the “Honeymyrtle shrubland on limestone ridges of the Swan Coastal Plain Bioregion”, which is proposed for inclusion in the Critically Endangered category on the EPBC Act list of threatened ecological communities.

The Urban Development Institute of Australia (UDIA) WA is the peak body representing the property development industry in WA. As a membership organisation, we have private and public sector members, and our key focus is on the facilitating supply across the housing continuum.

The intent of the listing is to give Commonwealth protection to what is called FCT 26a in Western Australia. FCT 26a has been listed as a State TEC for many years but the ecological community is not listed under the EPBC Act. True areas of 26a are indeed rare and under threat mostly from limestone mining but also clearing for roads, rail, and development so we agree it warrants listing.

However, the difficulties in accurately identifying FCT 26a could have considerable implications for development and the timely provision of much-needed housing supply. We therefore wish to make the following comments for consideration:

- FCT 26a is restricted in distribution, occurring close to the coast mostly north of Perth, but also to the south. However, its accurate identification usually requires complex (and often subjective) statistical analysis to differentiate between an area of true 26a from other vegetation where *Melaleuca huegelii* might be present but is not FCT 26a.
- The description of the ecological community in the Conservation Advice in section ‘2.1 Key Diagnostic Characteristics’ is extremely broad, and this could potentially pick up all areas containing Parrot Bush (*Banksia sessilis*). This would significantly impact development along the coastline if the listing is relevant (i.e. if a development has not already been approved and decisions made under the EPBC Act prior to the listing), particularly as the minimum patch size for this ecological community is 100m<sup>2</sup>.
- Based on expert advice, we understand it will be almost impossible to offset this ecological community unless there are known (or yet to be known) occurrences on private land and the community cannot be constructed / rehabilitated.

e: [udia@udiawa.com.au](mailto:udia@udiawa.com.au)  
w: [www.udiawa.com.au](http://www.udiawa.com.au)  
t: 08 9215 3400

Urban Development Institute of Australia (Western Australia)  
Unit 26, Level 1, 3 Wexford Street, Subiaco WA, 6008  
abn 632 211 689 44



We would request that the above be given consideration by DCCEEW and that tight rules for the definition of the community by statistical analyses are set to ensure that 'areas which may resemble aspects of the community' are treated differently to 'areas which correspond to the defined community'.

Thank you again for the opportunity to provide feedback. Should you require further information or wish to discuss this please contact Sarah Macaulay, Executive Director – Strategy and Policy at [smacaulay@udiawa.com.au](mailto:smacaulay@udiawa.com.au) or 9215 3404.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tanya Steinbeck'.

Tanya Steinbeck  
**Chief Executive Officer**