



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

25 February 2021

Department of Water and Environmental Regulation
Prime House
8 Davidson Terrace
Joondalup WA 6027

Re: CPS 9197/1 City of Wanneroo

The Wildflower Society of WA (WSWA) objects to the granting of a Clearing Permit (application CPS 9197/1) to WA Limestone for limestone quarrying at Nowergup. Below we list several issues with the proposed clearing (and rehabilitation) that warrant a refusal. We note that this permit application is essentially the same as the previously granted (and overturned) permit CPS 4924/3, but that this time the actual owner of the land has applied for the permit. As such, the Department of Water and Environmental Regulation (DWER) will likely assess the application in a similar manner to the permit CPS 4924/3.

Impact on Banksia Woodlands

Prior vegetation surveys (Regeneration Technology 2006) and prior site visits by DWER (DWER 2019) indicate that 0.42 ha of Commonwealth-listed threatened ecological community Banksia Woodlands of the Swan Coastal Plain (Banksia Woodlands) will be cleared by the proposal. Given that rehabilitation of this area to its former state is highly unlikely (more on this below), this clearing would result in a residual impact. It is likely that an offset will be specified as a condition of a permit by DWER to offset this residual impact. The WSWA has frequently observed that offsets for clearing of Banksia Woodlands do not follow the approved Conservation Advice (Commonwealth of Australia 2016). In particular, the advice that seems to be frequently and inappropriately ignored is the following (Commonwealth of Australia 2016):

"Avoid the requirement for offsetting, by avoiding and mitigating impacts to the ecological community first. Further to 'like-for-like' principles, match offsets to the same sub-community (usually Floristic Community Type), as it is not appropriate to offset losses of one component with other components of the ecological community, given the high local endemism and β -diversity"

Given that "cost-effective" Banksia Woodland is rarely found near clearing proposals, the WSWA would object to the default offering of a monetary contribution to purchase land far afield (such as in Gingin).

Furthermore, we contend that the impact to this TEC is avoidable as it represents a small parcel in the southeast corner of the clearing envelope; a small percentage of the total proposal. If a true economic value were imposed on this area (i.e. for a proximal, like-for-like parcel, or for a thorough rehabilitation program) then this small area would represent an uneconomic proposal, and clearing of it would be avoided.

Impact on Threatened Species

As previously documented from the associated permit CPS 4924/3 (DWER 2019), the Endangered Carnaby's Cockatoo will be impacted due to loss of foraging vegetation. This impact remains for this

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permit application. Given that DWER previously considered that an offset (of 95 ha, later reduced to 64 ha, of foraging habitat in Gingin) would offset the residual impact, it seems likely that such an offset would be prescribed once again. Indeed this residual impact should be offset if the permit were granted.

Threatened flora species will also potentially be impacted by the proposed clearing. None of the documentation presented with the application states that a targeted survey had been performed for threatened flora potentially on the site. Rather, none had been found in the surveys performed, which were not targeted surveys. Furthermore, DWER inspected the site in 2018 and subsequently commented (DWER 2019):

"The second threatened flora species grows in association with tall open scrub of *Melaleuca systema* on limestone ridges with sandy loam soils (Western Australian Herbarium, 1998-). While the application area contains limestone outcrops, it is not considered for the vegetation to be consistent with the preferred habitat for this threatened flora species."

This "second threatened flora species" is not named but it is most likely to be *Melaleuca* sp. Wanneroo, given the habitat description. The fact is that it has not been searched for and, indeed, the site does contain *Melaleuca systema* and limestone ridges (Regeneration Technology 2006), it is appropriate that a targeted survey be performed for the species before such assertions (above) are made by DWER.

Rehabilitation Proposal

The applicant states that the final land use is "Area to be revegetated to reflect pre-clearing conditions". This is extremely unlikely to be successful, given that rehabilitation of native vegetation communities, especially Banksia woodlands, has never resulted in a community composition close to that originally present. Indeed, the clearing and rehabilitation management plan accompanying the application refers to the 8 ha of degraded former quarry - not the land to be cleared - and has targets aiming to provide feed and habitat for Carnaby's Cockatoos. This final revegetation aim is very different to achieving pre-clearing conditions.

Any credible rehabilitation plan must attempt to replicate the original community composition, which, in this case, would achieve greater success if the original soil and subsoils were also replicated - and this is extremely difficult to achieve after the bulk of the soil has been removed. Nonetheless, if such a comprehensive rehabilitation plan were offered this could amount to a rehabilitation effort should the permit be granted and an offset offered. However, as the application stands, the proposed rehabilitation would be inadequate to mitigate the impact on much of the vegetation, especially the Banksia Woodlands.

Conclusion

The WSWA recommends that the clearing proposal be rejected due to unknown impacts on threatened flora, and what would likely be inadequate mitigation and offsetting of residual impacts on Commonwealth-listed Banksia Woodland TEC.



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References

Commonwealth of Australia (2016). Approved Conservation Advice (incorporating listing advice) for the Banksia Woodlands of the Swan Coastal Plain ecological community

DWER (2019). CPS 4924/3

Regeneration Technology Pty Ltd (2006). Lot 8 Wattle Ave Nowergup: Flora and Vegetation Assessment October 2006.