



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

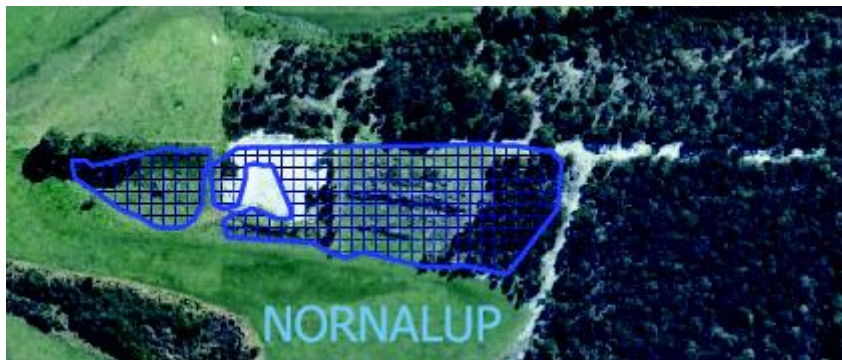
12 April 2021  
Department of Water and Environmental Regulation  
Prime House  
8 Davidson Terrace  
Joondalup WA 6027

Re: CPS 9231/1 Godfrey Burnside, Shire of Denmark

The Wildflower Society of WA (WSWA) objects to the granting of a Clearing Permit (application CPS 9231/1) as applied for by Godfrey Burnside for the establishment of pasture at Nornalup. Our main concerns are that no environmental surveys have been performed and there does not appear to have been avoidance or minimisation options considered.

### **Avoidance and minimisation**

The proposed clearing of 1.3 ha for pasture does appear to include areas previously cleared and with only partial regrowth of native vegetation. The exception to this is the eastern-most part of the clearing envelope, which is a block of forest (approximately 0.4 ha) adjacent to a larger block of forest, and which would be contiguous with that vegetation apart from the presence of a track dividing the two. This block of forest is the main area of concern with this application:



The aerial imagery, of course, is not definitive in terms of vegetation composition and condition, but it does not appear to indicate a substantially altered or degraded parcel of forest. Therefore, we contend that environmental surveys on this block are essential before clearing can be properly assessed or considered. If this block of forest were removed from the application area, there would be lesser concern for flora, although some fauna species, such as black cockatoos, potentially could be impacted depending on the trees present in the remainder of the application area.

### **Potential impact on conservation-signification taxa**

No surveys for flora or fauna have been conducted by the proponent. However, using the Naturemap utility, 16 priority flora taxa have been recorded within 5 km of the proposed clearing and as many as six within 1.5 km. Also within 5 km, 15 conservation-significant fauna species have been recorded, including Baudin's and Carnaby's Cockatoo, and the Quokka.



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Given the potential for these significant species to be present and be impacted by any clearing, as stated above, it is imperative that environmental surveys be performed before clearing of intact remnant vegetation be assessed.

### Conclusion

**The WSWA recommends that the clearing proposal, as it stands, be rejected due to unknown impacts on conservation-significant flora and fauna, and inadequate demonstration of avoidance and minimisation. Critically, before the impacts can be accurately ascertained, environmental surveys should be mandated by DWER to allow the clearing impact to be fully assessed.**



<http://www.wildflowersocietywa.org.au/>