



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

21 May 2021

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

Re: CPS 9260/1 Shire of Gnowangerup

The Wildflower Society of WA (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that the Clearing Permit application (CPS 9260/1), applied for by Peter William Ruland, Peter Charles Hassell and Lisa Diana Hassell for extraction of road rubble and roadway construction material, should not be granted due to unknown impacts on conservation-significant flora as well as inadequate baseline knowledge of the vegetation community to be cleared.

### **Potential Impacts on Conservation-significant Flora**

Five hectares of native vegetation in undetermined condition are proposed to be cleared by the proponent. Because flora surveys have not been conducted it cannot be stated whether the clearing will impact a threatened ecological community (TEC). The only TEC listed by the Commonwealth Department of Agriculture, Water and the Environment is the *Proteaceae Dominated Kwongan Shrublands of the Southeast Coastal Floristic Province of Western Australia*. Given that the vegetation probably occurs on a rock body/outcrop, this TEC possibly will not be impacted.

It is different matter for conservation-significant flora, however. A search of the surrounding 10 km using Naturemap reveals 28 conservation-significant flora, including eight Threatened and four P1-category taxa. The parcel of vegetation to be cleared is connected to a larger remnant, and no specimens have been recorded from this remnant. Therefore it has almost certainly never been surveyed. With such a high number of conservation-significant taxa in the local vicinity, it is imperative that flora surveys be conducted to ascertain the vegetation community composition, as well as targeted surveys to determine whether any of those significant flora may be impacted.

### **Inadequacy of Revegetation Plan**

As stated above, the vegetation proposed to be cleared has likely not been surveyed, yet the proponent states that "The area will be revegetated to reflect pre-clearing conditions after extraction is complete". Such a revegetation attempt is highly likely to be a complete failure in the absence of baseline information on the vegetation to be cleared. Additionally, the proponent has not presented any revegetation plan that would otherwise allay these concerns. For these reasons it is imperative that a flora survey be conducted on the vegetation to accurately determine the community composition and any soil or species-specific rehabilitation requirements.

### **Conclusion**

**The WSWA recommends that the permit not be granted, because the clearing proposal has unknown impacts on conservation-significant flora. We recommend that DWER require both vegetation surveys and a targeted flora survey before assessment of the permit application is made.**

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

### References

Department of Environmental Regulation (2016). Clearing Permit Decision Report CPS 6940/1.

Department of Mines and Petroleum (2015). Clearing Permit Decision Report CPS 6823/1