



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

9 April 2021

Appeals Convenor
Office of the Appeals Convenor
Level 22 Forrest Centre
221 St Georges Terrace
PERTH WA 6000

Attn: Emma Gaunt

Re: CPS 8933/1 Shire of Capel

The Wildflower Society of WA (WSWA) hereby appeals the Clearing Permit (CPS 8933/1) granted by the Department of Water and Environmental Regulation (DWER) to the Shire of Capel for clearing of up to 1.12 ha of roadside vegetation along 1.74 km of Weld Road. Our appeal mainly concerns conditions relating to the specified offset as well as avoidance options not considered.

The Decision Report notes that the clearing will be of a significant remnant in an extensively cleared area and, as such, is at variance with Clearing Principle (e). In such cases, the WSWA advocates the purchasing of adjacent, cleared land and constructing a new road formation in that area. There are obvious cost implications for doing so. Nonetheless, this is increasingly being done (by Main Roads WA, for example). It is not mentioned that this was considered as an option and hence we contend that this particular avoidance measure was not given due consideration.

We do commend DWER for requiring an offset for the residual clearing impacts. However, we contend that the Offset Condition (10) needs strengthening. Specifically, although 10(b)(ii) states that "planting native vegetation that will result in similar species composition, structure and density of native vegetation to the surrounding vegetation within the offset site" must occur, Criterion 1 gives a minimum target of "Species richness of minimum 50 per cent of those planted".

There are three issues with this Criterion:

- 1) 50% is a low standard to achieve;
- 2) no initial richness has been specified, and the overarching condition of "similar species composition" is open to interpretation;
- 3) No specific reference sites or surveys have been given.

We note that the surrounding vegetation contains a mix of vegetation types, including rehabilitation, and we contend that a condition with objective, quantitative baselines would be better and should have been specified by DWER. The conditions should specify an analogue site/s to be used for comparison of species composition to establish if the revegetation is destined to reach the desired composition early in its evolution.



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Yours faithfully,



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