



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

6 May 2021

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

Re: CPS 9167/1 Shire of Dardanup

The Wildflower Society of WA (WSWA) objects to the granting of a Clearing Permit (application CPS 9167/1) applied for by the Shire of Dardanup for road widening along Pile Road. Our main concerns are that here does not appear to have been adequate avoidance and minimisation options considered and no environmental surveys have been conducted.

Avoidance and minimisation

The applicant proposes to clear up to 6.698 ha along about 12 km (in two sections) of Pile Road. A member of the WSWA has recently driven along this stretch of road and provided feedback that the road width, condition and visibility were of an acceptable standard. Furthermore, *streetview* and aerial imagery indicate that the sealed road width is generally about 7 m, with 1 to 1.5 m of road shoulder, plus additional cleared area for the drains and batters. Clearing of ~6.7 ha along this road would amount to a width of approximately 5.65 m on average (approx. 3 m either side).

Whilst it is clear that some areas of the existing maintenance zone have vegetation, it is not stated in the application that clearing is intended to clear only in the current maintenance zone. Rather, it appears as though it is sought to extend the width of the existing maintenance zone by 5 to 6 m. No evidence has been provided as to why this is necessary and, furthermore, this does not appear be necessary. If the clearing is sought solely because regrowth vegetation in the maintenance is older than 10 years, then the WSWA has no objection to the granting of the permit. However, if that is not the case, then clear demonstration of avoidance and minimisation measures has not been made.

Potential impact on conservation-signification taxa

No surveys for flora of fauna have been conducted by the proponent. However, using the Naturemap utility, 15 conservation-significant flora have been recorded within a 10 km radius of the centre of the Pile Road area. One of these is Threatened (*Synaphea* sp. Fairbridge Farm) and there are also two P1 species, one of which is endemic to the area (*Stylidium perplexum*). There are also Threatened black cockatoos that use the area for foraging and habitat.

The WSWA contends that with potential impact on flora and fauna of such environmental value it is imperative that environmental surveys be performed before assessment of the application can be concluded.



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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. By contrast, if clearing is only intended in the current road maintenance zone, then the WSWA has no objection to the granting of the permit. Critically, before the impacts can be accurately ascertained, environmental surveys should be mandated by DWER before the clearing impact is assessed, should it occur beyond the current maintenance zone.



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