



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

19 July 2021

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

Attn: Emma Gaunt

Re: CPS 8807/1 Shire of Wanneroo

The Wildflower Society of WA (WSWA) hereby appeals the conditions of the Clearing Permit (CPS 8807/1) granted by the Department of Water and Environmental Regulation (DWER) to the City of Wanneroo (CoW) for clearing of up to 3.5 ha at Two Rocks. Whilst we regard the conditions as being generally correctly applied according to the EPA guidelines, our main point of contention is that the vegetation rehabilitation and offset conditions do not ensure restoration of the communities to be cleared. This is especially important as two State-listed Priority Ecological Communities (PECs) and a Bush Forever site will be impacted. We are also concerned that the CoW has not previously demonstrated a capacity to carry out vegetation rehabilitation of this nature as it has not referenced any sites that demonstrate their capacity to complete such works.

The main problem is with Schedule 2, referred to in Condition 9(g) and (i) and Condition 12. Criterion 1 of Schedule 2 states that the target richness should be a:

"Minimum of 50% of native vegetation species returned based on propagation capacity of species. Therefore revegetation areas shall have a minimum of 50% native species per quadrat, as obtained by the average recorded at the reference sites."

Because two PECs - 2.15 ha of 'Coastal shrublands on shallow sands, southern Swan Coastal Plain' (P3) and 0.29 ha of 'Northern Spearwood shrublands and woodlands' P3 - and Bush Forever site 397 will be impacted, DWER have specified that rehabilitation must be conducted, including rehabilitation of offsets sites. The assumption underlying these rehabilitation efforts is summed up in the Decision Report by DWER:

"Noting the above, the extent and composition of the vegetation proposed to be cleared, and proposed revegetation of temporary cleared areas to resemble that of preclearing vegetation, the proposed clearing is not likely to significantly impact..."

and

"...rehabilitating temporary cleared areas post works to ensure vegetation is not permanently loss..."

We contend that these statements regarding the revegetation resembling the cleared areas are not correct because the revegetation targets are set to a low bar of 50%. That is, the rehabilitated



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vegetation will likely be little more than half as rich as that cleared and so will not sufficiently "resemble" the original communities.

The origins of these low targets appear to be the City of Wanneroo's Rehabilitation and Revegetation Plan (RRP; City of Wanneroo, 2020). The 50% targets are made explicit in Table 7 of the RRP and the justifications for excluding species in the rehabilitation targets are given in Table 6 (City of Wanneroo, 2020). However, several of the justifications made in Table 6 are, at best, weak or, indeed, plainly wrong. Below, we highlight the main egregious examples:

- "Orchid species (five in total) have been removed as they are too difficult to collect and propagate..."
- "Grass species (annual and perennial) have been removed from the species list as they regenerate well through the seed bank in the topsoil"
- "Annual species do not provide a long term benefit to the site and offer little return for the effort"

We contend that orchid species *can* be effectively collected and translocated: the orchids listed have underground storage organs (tubers) which easily survive translocation. These should be collected and included in the rehabilitated areas.

For the last two examples, if these species regenerate so well through the seed bank in the topsoil then these species *should* be included in the target species list. Indeed, those targets should be easy to achieve, provided the topsoil was handled correctly.

We also note that difficult-to-propagate sedges and rushes (e.g. *Lepidosperma calcicola* and *Desmocladius asper*) are not included in the list of target species (Table 10, City of Wanneroo, 2020). These species should be salvaged and translocated, something which can be done successfully provided the whole plant (and root system) and all associated soil are removed as a single unit (one local commercial operation that uses this technique is Nuts about Natives, nutsaboutnatives.com.au).

The revegetation requirements should require the identification of analogue site/s to be used as comparison sites to demonstrate that the revegetation completed is representative of the vegetation it replaces/offsets. A procedure like Ecological Function Analysis should be used to make the comparison.

Conclusion

In summary, the WSWA contends that the species richness targets in Schedule 2 should be substantially increased and, given that the vegetation communities mainly comprise species that are easy to germinate or translocate, we contend that a 100% species richness target is achievable. Without achieving full restoration of the communities, the suppositions, upon which DWER's decision are based, are not valid.

WSWA also contends the City of Wanneroo should demonstrate its ability to complete such works to the standard required as failure to do so makes any other condition objectives irrelevant.



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

References

City of Wanneroo (2020). PR-4234 Two Rocks Beach Access – Rehabilitation and Revegetation Plan CPS 8807/1