



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

8 August 2021

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

Re: **CPS 9349/1 Shire of Plantagenet**

The Wildflower Society of WA (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that assessment of the Clearing Permit application (CPS 9349/1), submitted by the Shire of Plantagenet (SoP), be delayed until an in-season flora survey, as well as a *Phytophthora* survey, have been conducted. Our main concerns are that conservation-significant flora may be impacted and the potential spread of *Phytophthora*-induced dieback have not been adequately assessed. If these concerns are not adequately addressed then we recommend that the clearing permit should not be granted. We detail these concerns below.

Edge-area Ratio and Fragmentation

The myriad of trails proposed in this block of bushland will fragment what is currently a viable and reasonably sustainable body of vegetation with a fixed length of edge into a series of fragmented lots of vegetation with a significantly increased edge around the fragmented lots increasing the edge-area ratio and creating a series of unsustainable blocks of vegetation. The fragmentation created by the lots will significantly increase the potential for weed invasion, plant and animal disease, potential for arson, ongoing ground disturbance through endorsed and illegal development of the trails for mountain-biking, waste dumping, feral animal invasion and stress to small animals and birds required to move between fragments and to nest and burrow in the area. The level of track creation proposed will ultimately render the area unsuitable for nature conservation and unsustainable without continuous management effort. WSWA contends that the economic benefit that will be derived will not exceed the benefits currently available through promotion of nature-based passive recreation, which mountain-biking cannot be classified as being.

The creation of mountain-biking trails will also encourage the use of the area by off-road motorcyclists as well as increasing desire for modification of trails to provide increased level of difficulty for mountain-biking.

Impact on Conservation-significant flora

The application is for clearing of 1.29 ha of native vegetation for the construction of recreation bike and walk trails, and parking improvements. An out-of-season survey was done, with priority flora species - *Banksia porrecta* (P4) and likely *Verticordia endlicheriana* var. *angustifolia* (P3) - found in the area (Bio Diverse Solutions, 2020). However, because the flora survey was conducted out of season, several taxa that potentially were of conservation significance were not able to be identified with certainty. Indeed, the environmental consultancy recommended that an in-season survey be conducted and that it take place after September 2021, due to the recent fire in the area.

Given the uncertain impacts on conservation-significant flora, the WSWA strongly recommends that DWER wait for an in-season survey before completing assessment of the application.



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

Potential impact of *Phytophthora*

The proposed clearing would result in a web of trails spreading through vegetation in very good to excellent condition. Many species in the vegetation communities (e.g. *Banksia* species, *Eucalytus marginata*) are highly susceptible to *Phytophthora*-induced dieback. The clearing application and associated documents, however, do not consider the potential for the pathogen's introduction and spread, nor has there been any evidence presented that testing for its current presence has occurred. Given that *Phytophthora* has the potential to devastate much of the reserve, well beyond the proposed trails, serious consideration and planning must be devoted to assess its potential for introduction and spread.

Potential degradation of vegetation condition due to weed introduction

A final threatening process, not considered in the application, is the potential introduction of weeds into, and the spread of weeds throughout, the reserve. Increasing the edges of remnant bushland patches is a well-known threatening process with respect to the spread of weeds. The proposed network of trails effectively creates a series of patches with a total edge length far greater than at present. Simply imposing conditions that attempt to prevent the introduction of weeds during clearing is insufficient to prevent their subsequent introduction, given that the whole purpose of the trails is for frequent use by people who may bring weed seeds with them, on their footwear, clothing or bikes.

This potential for degradation of the reserve, which is in very good to excellent condition, needs to be properly assessed. There has been no evidence presented that it has been.

Conclusion

This proposal introduces active recreation into an area that currently provides significant value for nature conservation and passive recreation.

The WSWA recommends that

- **The clearing permit application be rejected as the proposal threatens the nature conservation values of the affected area and these values cannot be sustained by the proposal as a result of the active recreation that it will introduce.**
- **Further flora and *Phytophthora* surveys have been conducted.**
- **Serious consideration also needs to be given to the potential for future degradation not only due to *Phytophthora* but also due to the spread of weeds.**
- **The loss of biological values through this proposal outweighs any economic benefit that this proposal derives as it decreases both the natural and passive recreation values the project area offers.**



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)



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

References

Bio Diverse Solutions (2020). Reserve 15162 Survey Tower Road – Flora and Vegetation Survey