



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

10 November 2021

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

Re: **CPS 9441/1 Summerstar Pty Ltd**

The Wildflower Society of WA (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that assessment of the Clearing Permit application CPS 9441/1, submitted by Summerstar Pty Ltd with regards to Rest Point Caravan Park, be delayed until a more detailed flora and vegetation survey is conducted. WSWA has particular concerns with the lack of information on the condition of vegetation, conservation significant flora and communities, the potential for Black Cockatoo nesting habitat, and the spread of weed species and *Phytophthora*-dieback. We recommend the clearing application be rejected if these concerns are not adequately addressed. We detail these concerns below.

Vegetation condition

From the supporting information supplied with the application it is evident that much of the proposal area comprises of scattered remnant trees over grass. However, the eastern portion of the proposal area has a much more continuous tree canopy, and based on the single photo supplied in the accompanying flora and vegetation report by Ecosystem Solutions (2018), appears to be in 'excellent condition' (EPA 2016). Jarrah/Marri vegetation in excellent condition is likely to be more severely impacted by the proposal and hence, requires more stringent assessment for impacts than for already modified parts of the proposal area. No definitive condition assessment however, has been made. The WSWA recommends a definitive assessment be completed.

Conservation significant flora and communities

The impacts of the proposed clearing cannot be assessed without complete information of conservation significant flora and communities. Appendix A of the flora and vegetation report (Ecosystems Solutions 2018) provides the results of a desktop search of the EPBC Act Protected Matters database for the proposal area and surrounds. Several federally listed conservation significant flora species occur or have the potential to occur in the area. No equivalent desktop study results are given for state listed species or communities. It appears *Chamaexeros longicaulis* (P2) was the only conservation significant flora species considered in the field. The applicant must clarify whether state listed species and communities were considered, and whether a field survey was undertaken for all federally and state listed flora and communities occurring or likely to occur in the proposal area. If they were not, a much more detailed survey must be undertaken.

Black Cockatoo habitat

The proposed clearing seeks to remove many native trees. These may provide habitat for all three Western Australian black cockatoo species, all of which are identified in the Protected Matters database search as occurring in the proposal area. Further, we note that the applicant plans to use non-native tree plantings following clearing. The WSWA recommends that the application not be



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considered further until an assessment of cockatoo habitat has been made, potential impacts minimised, and remedial actions or offsets identified.

Phytophthora-dieback

The clearing application and associated documents do not consider the potential for the introduction and spread of the pathogen *Phytophthora*. The proposed playground and mountain bike tracks, and adjoining firebreaks in particular could act as conduits for the pathogen into adjoining undisturbed vegetation. Assessment and mitigation of the potential impacts of *Phytophthora*-dieback on vegetation must be made before the application is considered further.

Weed species

The potential introduction and spread of weeds through the apparently intact eastern portion of the proposal area has not been considered. Given the already altered vegetation of the remainder of the proposal area, weed spread is likely. Assessment and mitigation of the potential impacts of weed species on vegetation must be made before the application is considered further.

Conclusions

The WSWA recommends that the clearing permit application by Summerstar Pty Ltd not be considered further until additional information and clarification is provided on the concerns raised above. Should the additional information not be supplied, the clearing application must be rejected.



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

References

Ecosystem Solutions (2018). Flora and Spider Assessment: Rest Point Holiday Village, Rest Point Rd, Walpole.

Environmental Protection Authority (2016). Technical Guidance - Flora and Vegetation Surveys for Environmental Impact Assessment.



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