



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

11 January 2022

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

### **CPS 9281/1 Ralston Road Shire of Tammin**

The Wildflower Society of WA (WSWA) hereby appeals Clearing Permit CPS 9261/1 granted by the Department of Water and Environmental Regulation (DWER) to the Shire of Augusta-Margaret River to clear 0.36 hectares of native vegetation to improve sightlines on Ralston Road adjacent to the Charles Gardner Nature Reserve.

The basis of the appeal is:

1. Failure to consider the ability of avoid or minimise clearing.
2. Failure to consider alternatives to the proposed action.
3. The lack of a suitable offset being proposed/offered.
4. The competency of the flora survey.

There is potential to avoid or minimise having to clear through the consideration of the potential to reduce the speed limit in the section of Ralston Road that passes through and along the boundary with the Charles Gardener Nature Reserve. The sight lines required to safely traverse at a specific speed is a function of the driver's ability to see a clear road for the stopping distance required at that speed. The potential to strike animals crossing the road is also a function of vehicle speed. Given the significance of ALL native vegetation in the locality, as the overall vegetation cover for that locality within a 20 km radius is less than the minimum 30% required to avoid exponential loss of biodiversity, WSWA considers every possible alternative should be considered to avoid clearing, despite the approval of local DBCA to provide access to Charles Gardner Nature Reserve. Although small, this approval by DWER is another of the losses by a thousand cuts that continues to occur in the Wheatbelt Region.

If clearing at any reasonable speed reduction, to 60 km/h for example, could not achieve the sightline requirements, the option of pruning/mulching the top growth down to a height of 0.5m should be considered. This could be achieved without the total loss of the vegetation species, even the Allocasuarina and Acacia species, but still provide the sightlines required.

Given the very low percentage of pre-European vegetation cover remaining, WSWA believes an offset of 3.6 ha of natural vegetation or 7.2 ha planted/seeded vegetation should be required to be protected/established to compensate for the proposed loss of vegetation. The ratio proposed reflects the importance of retaining existing vegetation in this region.

WSWA is also concerned about the competence of the flora survey conducted for this project. Our investigations have identified one author studied English and Philosophy and the second studied at Muresk College, so neither has a formal qualification in botany.



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

### Recommendation

#### WSWA considers:

- The Shire of Tammin should be requested to consider all alternatives available to clearing the sightlines on Ralston Road.
- The flora study should be reviewed by an independent third party botanist to assess its completeness and accuracy.
- An offset, in the ratios proposed should be required as part of any approval to clear.



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

### Reference