



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

09 February 2022

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

### Re: CPS 9427/1 Public Transport Authority of Western Australia

The Wildflower Society of WA (the Society) hereby appeals the conditions of Clearing Permit (CPS 9427/1) by the Department of Water and Environmental Regulation (DWER) to the Public Transport Authority of Western Australia (PTA) for the clearing of approximately 1.06 ha of vegetation for the removal of level crossings along the Armadale train line, Perth. We note the inadequate ratio of tree removal to tree replacement, and the lack of detail on potential planting sites, and hence, the lack of protection for newly planted trees from subsequent clearing.

#### **Replacement ratio**

A 1:1 ratio is not adequate to ensure the *long-term* replacement of jarrah and marri trees which will be cleared. While we acknowledge the conditions relating to weeding and watering in the first two years, it is still likely that a proportion of the seedlings and young saplings will die in their first few years after planting. A higher ratio would ensure an adequate number of trees will establish as soon as possible after clearing, thus providing for cockatoo foraging and roosting as soon as possible. We maintain that DWER should include a revised ratio in the permit conditions. Also, seedlings do not replace the ecosystem function of mature trees and the Society considers a ratio of 10 seedlings per tree removed assists in replacing the ecosystem function lost.

#### **Suitable locations and protection from future clearing**

The permit conditions state that the PTA is to plant jarrah and marri trees in "suitable locations", that is, in the public open spaces resulting from the removal of the level crossings, or local council and crown reserves within 5 km of the permit area. None of these locations guarantee that planted trees will not be cleared themselves, and therefore, not result in a net loss of vegetation. It will take several decades for replacement trees to become useful for cockatoo foraging and roosting, and many decades to become useful for nesting. Further, the planting of replacement trees should not be in place of planting to be undertaken by local councils as part of their normal operations but in addition to these. The PTA and DWER must provide details of how the *persistence* of planted trees is to be ensured.

#### **Conclusion**

The WSWA contends that additional conditions must be imposed upon permit CPS 9427/1 to ensure the adequacy of ecosystem function replacement and *long-term* replacement and *persistence* of trees lost to clearing.