



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

28 January 2022

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

Re: CPS 9516/1 City of Albany

The Wildflower Society of Western Australia (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that Clearing Permit application CPS 9516/1, submitted by the City of Albany (CoA) with regards to the widening of Millbrook Road, be rejected. The supporting flora survey is ambiguous, there are no exact details on the intended clearing, and the magnitude of subsequent impacts on flora and vegetation is not stated.

A search of the proposed clearing area using the Commonwealth Protected Matters search tool (Department of Agriculture, Water and the Environment) indicates that there are likely more threatened species than the two (*Banksia goodie*, Endangered, *Banksia brownie*, Vulnerable) searched for in the field by Great Southern Bio Logic (2016). It is unclear from their report if these were also considered, as well as any conservation significant flora listed at the State level. It is also unclear if the Commonwealth listed threatened ecological community (TEC) "Proteaceae Dominated Kwongan Shrublands of the southeast coastal floristic province of western Australia (Endangered)" which has the possibility of occurring in the eastern portion of the clearing area, was searched for. This is particularly incongruous given DWER already communicated this possibility to the CoA in a permit application acceptance letter. We therefore maintain that DWER should seek clarification on these matters prior to proceeding with the application. Should this not be possible the CoA must provide additional information on conservation significant flora and vegetation in the proposed clearing area.

The CoA has made no commitments regarding recovery and reuse of plant material from within the cleared area or proposed exclusion zones around the areas identified to contain the threatened species. WSWA believes this aspect requires formal commitment to management of this issue and a description of how it will be achieved.

The CoA has not provided sufficient detail on the extent of vegetation to be cleared. Photos taken by WSWA members of the pertinent section of Millbrook Road indicate that substantial shoulders already exist which could be utilised for most of the suggested works. If not, the CoA must outline how much more width it requires (and why) and hence, the specific area of vegetation to be cleared. There is no clear definition of the steps taken to avoid, minimise, mitigate or offset any justifiable clearing.



L to R: Millbrook Rd north side looking east, south side looking east, previous works looking east



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Whilst there is reference to dieback in the flora report, no discussion is provided to verify presence/absence of the fungus or any commitment to management in the permit application of documentation. There has been no assessment of the impact that the proposed clearing will have on flora and vegetation, likely due to the lack of clarity and detail outlined above. In its application, the CoA seems to indicate that it does not intend to clear any individuals of the two threatened *Banksia* species. However, this must be stated explicitly if so and similarly, any potential direct impacts on other significant flora and vegetation also. This will help clarify the need for referral to the Federal minister.

WSWA is also concerned about the linkage the roadside provides for movement of fauna along, and across the road, together with the linkage it provides between remnants along the road. There appears to be no consideration of the fauna that exists in the area and its utility along the road.

Within the documentation provided there is no assessment of the cumulative impacts that will arise in combination with this proposal.

In addition, the WSWA maintains that indirect impacts to flora and vegetation must also be considered given the very narrow and linear nature of the vegetation in question. Such vegetation is well known to be more susceptible to threatening processes such as dieback and weeds. Removal of more vegetation will exacerbate these effects.

Conclusions

The WSWA recommends that the clearing permit application by CoA be rejected unless:

- Details of the actual work proposed to warrant the clearing sought in the permit
- The flora report is clarified and if needs be, further survey work undertaken
- Specific detail is given on if and how much vegetation is required to be cleared
- Management plans for dieback and use of cleared material, as the condition of the roadside is described as in very good condition
- Fauna in the area and impacts on it through implementation of this proposal
- The matter be referred to the Federal minister if necessary



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



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References

Great Southern Bio Logic 2016. Targeted Flora Survey: Millbrook Rd. Letter report.