



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

3 March 2022

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

Re: **CPS 9553/1 Australian Islamic College**

The Wildflower Society of Western Australia (the Society) recommends to the Department of Water and Environmental Regulation (DWER) that Clearing Permit application CPS 9553/1, submitted by Australian Islamic College (AIC) with regards to building an educational facility in Forrestdale, be rejected unless alternative plans are presented for consideration, complete hydrological modelling is provided, and strict rehabilitation and or offset conditions are attached to any approval.

While we note the current plans make partial use of cleared areas, photos and aerial imagery presented in all documentation show that the proposed facility could be completely situated within cleared areas if land east of the power transmission easement were used. This indicates that AIC has not properly considered the “avoidance” principle in the design of this project. AIC should be requested to submit plans for the alternative option for consideration by DWER.

Approximately half of the main portion of vegetation applied to be cleared is considered the “low lying *Banksia attenuata* woodlands and shrublands” PEC. Emerge Associates (2022) state in their assessment of clearing principle d “Whilst this area does not have particularly high weed cover, the overstorey and understorey species are sparse and native species density is low. As such, the removal of this is not considered to have a significant impact”. This vegetation is regrowth and as such, will continue to increase in value with time, and represents a net gain to vegetation. We therefore maintain that the value of this vegetation has been underestimated and should be protected from clearing and or offsets applied (e.g. rehabilitation of degraded areas east of the easement).

The Society maintains that the hydrological assessment of the site with regards to impacts on surrounding wetlands is incomplete. Emerge Associates (2022a) have considered runoff and sewerage as possible threats to the three surrounding conservation category wetlands (CCW). However, they have failed to detail the effect of fill material to be used to raise the multiple use wetland (MUW) in the centre of the planned development as well the effect of possible groundwater abstraction on local groundwater levels. The nearby DWER monitoring bore (JM36) shows local groundwater levels are in serious decline (Emerge Associates 2022a). As such, complete hydrological modelling showing no adverse impact on groundwater levels and in turn, wetland vegetation, must be submitted to DWER for consideration as part of the clearing application. The Society maintains that any application by AIC for a licence to abstract groundwater for irrigation must be denied.

While the AIC’s commitment to use “endemic plantings” (Emerge Associates 2022, 2022a) is commendable, we note that the tree species mentioned (e.g. *Agonis flexuosa*, *Banksia grandis*) are not endemic to area. Local tree species *Banksia attenuata*, *B menziesii*, *B illicifolia*, *Eucalyptus tottiana*, and *Melaleuca pressiana* must be included in the planting selection, with this stipulated as a condition of any approval.



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The AIC has committed to the long-term eradication of weeds in the eastern portion of the lot (Emerge Associates 2022a) yet no plans are given on how such a complex undertaking is to be achieved. Details must be provided if such a commitment is to be used as an offset to the impacts of any clearing.

Finally, we hope that the AIC recognises the great opportunity it has to use any degraded vegetation within the lot as an educational opportunity for primary and high school students, and the community, to engage with environmental restoration and stewardship.

Conclusions

The Society recommends that the clearing permit application by AIC be rejected unless:

- Alternative plans using cleared land only on both sides of the easement are submitted.
- The “low lying *Banksia attenuata* woodlands and shrublands” PEC in the western section is retained and/or offsets applied..
- Full hydrological modelling demonstrates no negative effect on local groundwater levels and that groundwater abstraction not be allowed.
- Species occurring within the development area are part of landscape plantings.
- Details on weed eradication in the eastern portion are provided.



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

References

Emerge Associates 2022. Clearing permit (area permit) application to undertake bulk Earthworks within a portion of lot 15 Nicholson road, Forrestdale. Cover letter.

Emerge Associates 2022a. Environmental Assessment and Management Plan: Nicholson Road Forrestdale development support.