



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

30 March 2022

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

**Re: CPS 9621/1 City of Busselton**

The Wildflower Society of WA (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that Clearing Permit application CPS 9621/1, submitted by the City of Busselton (CoB) with regards to the widening of Sugarloaf Road, be rejected in its current form.

The Application to clear concerning 0.99 ha native vegetation to allow road widening in the specified areas of Sugarloaf Road, occurs in an area identified as being in a National Park. Given that Sugarloaf Road is a dead-end road used largely for sightseeing, the road is not a primary thoroughfare, but a tourist road and the road standard adopted should reflect that purpose. It is likely that other measures, i.e. a reduced speed limit, lesser lateral clearance, narrower shoulders and one that lies softly on the land (not cut and fill) could be used to reduce the clearing required.

The CoB has not demonstrated that Sugarloaf Road is indeed dangerous or will become so. To do so it must provide data on accidents and incidents, and whether the cause of any of these is poor road design or condition. The proposed road safety improvement implications of the proposal and, despite their being a lack of evidential track record of serious accidents (according to WA road accident data 2016 to present) on Sugarloaf Road, are supported based on the principle of risk mitigation and improved road safety environments. (For example, widening the tarmac to allow 2 vehicles to pass each other without wheels engaging the gravel.) such as reducing the speed of drivers through adjusted speed limits and traffic calming features, could be used to mitigate the dangers present.

We also note that there have been efforts made in the updated submission to mitigate native vegetation clearance, however there remain a number of clear deficiencies in the proposed mitigation plan.

The Dept of Water and Environmental Regulation, in considering this application (CPS 9621-1), and with due regard to its responsibilities, should note the following:

- The proposed mitigation plan, including the Flora Survey and Clearing Assessment fail to follow the Main Road Guidance (see : [guide-to-completing-the-environmental-and-heritage-checklist-to-undertake-works-within-the-road-reserve.pdf](#) ([mainroads.wa.gov.au](http://mainroads.wa.gov.au)) in a number of key areas. Note Points 1,2 and 5 within the guidance



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- The flora survey was of the traverse type (walk and observe) which has several recognised weaknesses, not the least of which is that you only see what is immediately visible. Nonflowering or indistinct smaller species are lost in such a survey – despite their critical nature in that surveyed space.
- It is well recognised that random grid surveys, although somewhat more onerous are a significantly superior methodology and provide a rigorous and recognised data set of native vegetation in the surveyed space. The range of vegetation missed through a traverse survey we consider renders the outcomes unfit for purpose in this application.
- *Caladenia viridescens* (Endangered EPBC Act Listing) has previously been recorded along Sugarloaf Road by local WSWA botanists. The flora and vegetation survey provided was conducted on 25th October and 8th November 2019, which is likely to be too late to capture this species in flower, with WA Herbarium collections recorded as flowering in mid to late September. An additional flora survey should be conducted prior to works, when nearby populations of *C. viridescens* are flowering, to better capture the presence/absence of this species within the clearing footprint.
- Additional conservation significant flora species, *Stylidium lowrieanum* (Priority 3), has been recorded along Sugarloaf Road and *Austrostipa mundula* (Priority 3) has been recorded within 100m of the road. Neither of these records are included in the flora assessment.
- Specific vegetation along the road verges are old, coastal vegetation, well established and fragile given the tough conditions . Regrowth would likely be limited. No targeted effort for retaining these specimen plants has been made clear.
- We agree with focussing on single side vegetation removal, minimised to what is strictly required to obtain a safe road width with minimal but necessary roadside buffering. This should be specifically defined in the programme of work that described the clearance proposal.
- Absolute minimal interference with the uncleared side of the road, again specified in the scope of work. For example, maintaining or restoring existing roadside landscape (see point 5 in the guidance in point 1) – for example no concrete kerbing.
- A general comment regarding future use of the upgraded road. If there is consideration of increased access to larger vehicles (cf tourist buses) then there are clear implications downstream of resource and environmental sustainability at the Sugarloaf environment.
- Early consideration of such a scenario and its implications is strongly recommended.



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### **Conclusions**

While the WSWA agrees the existing road needs to be improved, we recommend that the clearing permit application by CoB be rejected by DWER given that the clearing has not been proved to be necessary, given the options available for development of a tourist road, and the flora survey provided is incomplete about some significant details.



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