



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

13 April 2022

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

**Re: CPS 9624/1 Shire of Chittering**

The Wildflower Society of Western Australia (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that Clearing Permit application CPS 9624/1, submitted by the Shire of Chittering (SoC) with regards to the widening of North Road in Wannamal, be rejected. Inadequate information is provided on mitigation strategies, no biological information or surveys support the application, and the proposed clearing would destroy linkages between remnant patches of vegetation in a highly fragmented landscape.

The SoC states in their application form that it looked at minimizing clearing for road widening by removing trees in the worst condition. No other information is given on mitigation measures. For example, the SoC should include considerations on whether road trains could be re-routed onto other, already suitable roads. If this is not possible, then plans which show road design features which minimize clearing (such as purchasing adjoining land and placing the road outside the defined road reserve, applying reduced speed limits to the road section used by over-dimension vehicles, allowing over-dimension vehicles to only travel in one direction on this road and then using an alternate parallel route, such as Hay Flat Road, on the return journey, and limiting the dimensions of vehicles used on the road) must be included with the application.

Other than 7 photos of the section of road in question, the SoC has provided no evidence of the flora and vegetation proposed to be cleared. 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 several threatened species of flora and fauna which may or are likely to occur in the area. Further, poor tree condition (which of the trees in the photos do not show) is not necessarily an indication of reduced impacts since such trees can still provide habitat. The SoC must therefore engage suitably qualified botanists and zoologists to provide biological surveys and hence, assess the impacts of the proposed clearing.

Roadside vegetation in highly fragmented landscapes, such as the SoC, provides critical linkage between remnant patches for both flora and fauna species. Clearing of such roadside vegetation is therefore at variance with Clearing Principle (e) – native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared. As such, the WSWA contends that clearing should not be allowed unless appropriate offsets (i.e. revegetation) which result in a net gain of overall vegetation cover can be put in place.



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

### **Conclusions**

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

- Adequate mitigation measures are presented
- Biological surveys are conducted
- Adequate offsets are put in place



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