



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

30 April 2022

Mr Alexander John  
Department of Planning, Lands and Heritage

Dear Mr John

**File No: 1851 - 1922, 2215 - 1988 and 802 – 2003**

**Case No: 171870, 902064 and 1902117**

The Wildflower Society of WA (WSWA) objects to the proposal to excise 14.2806 hectares to facilitate the widening of the South Western Highway in Shire of Manjimup under the Land Administration Act 1997 from the following three National Parks:

- Excision of 5.2066 ha from Class 'A' Reserve 18705 in Sir James Mitchell National Park
- Excision of 1.1890 ha from Class 'A' Reserve 47663 in Shannon National Park
- Excision of 7.8850 ha from Class 'A' Reserve 40836 in Dordagup National Park

The reasons for our objection are as follows:

1. The areas proposed to be excised are significantly large areas National Parks to be excised and then potentially cleared for road widening works. The loss of this amount of native vegetation forest from an 'A' class reserve is both excessive and unacceptable. National Parks comprising Class 'A' Reserves are declared as such for the purpose of conservation of nature and its biodiversity values in perpetuity, because of their very high natural values.
2. Any potential clearing for road widening results in wildlife habitat loss. It also constitutes 'deforestation' which reduces carbon sequestration and thus contributes to climate change.
3. Any potential clearing for road widening adds to the cumulative loss of vegetation cover in our SW biodiversity hotspot which is supposed to be 'for conservation priority because it is under threat'.
4. Any potential clearing for road widening also removes part of the tree canopy which reduces the tourist attraction of roads. The forest in the National Park in the areas proposed to be excised are potentially particularly scenic with many large, tall, majestic and ancient trees such as Karri, Jarrah, Bullich and Blackbutt. Many of the best and biggest of these trees are currently in or close to the existing road reserve, and are potentially are great threat of removal through the proposed excisions of the National Parks.
5. There is little or no site-specific information provided or available to the public to assess the significance or impact of the proposed excision. There is probably also little or no site-specific information available to the Department of Planning, Land and Heritage to assess the significance or impact of the proposed excision. This is not an acceptable way to plan for a significant excision of land from an area of very high natural and social values.



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6. Further, what flora and fauna surveys have been undertaken in the areas proposed to be excised? Adequate, comprehensive and recent flora and fauna surveys are required before any proposed land excision and road widening works are even considered. To leave such flora and fauna surveys until after a decision has been made to excise these areas is akin to giving approval to clear without undertaking the required environmental impact assessment before doing so, as there will then be an implicit expectation from any proponent that such clearing will be approved.
7. The proposed excisions do not appear to make any sense if the overall intention is to facilitate road widening and realignment in the context of road safety. The areas proposed to be excised are not contiguous, do not appear to focus on curves or widen the road.
8. The proposed excisions also do not appear to make any sense if the need for the excisions is to correct planning or road construction decisions in order to properly place the road reserve in an area not classified as National Park.

The exact reason for the proposal to excise 14.2806 hectares from the three National Parks is not made clear in the advertisement or accompanying documentation. If it is indeed to facilitate and allow clearing to widen South Western Highway for road safety purposes, we submit the following:

- why is there a need to widen the road? As far as we are aware, very few accidents have occurred in those areas proposed to be excised.
- anecdotal evidence and personal experience indicate that drivers slow down on narrower roads and thus automatically reduce the risk of accidents. The road does need to be upgraded, but a wider shoulder without further clearing would suffice.
- the road reserve is already quite wide in many places, with many areas of the roadside cleared from considerable distances from the existing travelling lane.
- alternatives to vegetation clearing should be considered first, such as lowering speed limits, road safety barriers, rumble strips and the like.
- Where large, tall, majestic, and ancient trees are close to the road, more innovative design solutions are required to be implemented to retain them.
- A full clearing impact assessment should be completed and approved, including requisite public consultation and comment, before further consideration of this excision is progressed.

This submission supersedes any earlier submission that has been made under the name of the Wildflower Society of Western Australia.



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### **Conclusion**

WSWA opposes the proposal to excise 14.2806 hectares from the Sir James Mitchell, Shannon and National Parks Dordagup in Shire of Manjimup. The WSWA would require more information and evidence for the need for any excision before accepting the need for such excision.



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