Response ID ANON-FYRA-XDA1-Z

Submitted to Perth Surf Park Submitted on 2022-12-03 10:48:51

Introduction

1 What is your name?

2 What is your email address?

Email:

cons_convenor@wildflowersocietywa.org.au

3 What is your organisation?

Organisation:

Wildflower Society of Western Australia

4 What is your postal address?

Postal address:

P O Box 519 Floreat WA 6014

5 Preferred option for decision by the EPA

Assess - Public environmental review

6 What are the reasons for your preferred option for decision of the EPA?

Reasons:

The following points prompt the preferred option of the Wildflower Society:

- 1. Loss of the Federally-listed Threatened Ecological Community of Banksia Woodlands of the Swan Coastal Plain.
- 2. Potential to disturb State-listed threatened native orchid species known to occur locally in close proximity to the site.
- 3. The project is or is likely to be at variance with clearing principles
- 4. The loss of local visual amenity.
- 5. Potential loss of wetlands suitable for restoration as conservation wetlands
- 6. The offsets proposal is totally inadequate as it is not proposed to replace like with like and it does not compensate for the loss of natural vegetation; it merely allows the purchase of private land that is already protected under the clearing regulations. Replacement of the area proposed for clearing by revegetation is opposed as there are no examples of revegetation which replaces the species composition of natural vegetation like-for-like; only partial replacement of species is achieved.
- 7. Some of the studies provided are almost 10 years of age and development in the immediate area has already resulted in substantial loss of vegetation to commercial, industrial and residential development. At least 30% of the vegetation in the area should be retained including 100% of areas classed as TEC or of MNS interest.

By checking this box you are consenting to your comments being used to inform the EPA's decision on whether to assess this proposal and, if so, the level of assessment, and understand that your comments and / or any part of your submission may be made public. If you wish your comments and / or any part of your submission (i.e. name and contact details) to be treated as confidential, please make a specific request in your submission. It is important to note that a request for confidentiality does not make your submission automatically exempt from disclosure. While the department will use its best endeavours to comply with your request, your submission (or part thereof) may still be disclosed if required under the Freedom of Information Act 1992, for procedural fairness purposes or under any other applicable law. :