



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

3 December 2023

Chair
Environmental Protection Authority
Locked Bag 10
Joondalup DC WA 6919.

Via the Consultation Hub

Re: Subdivision of Lot 123 Mortimer Road, Casuarina

The Wildflower Society of Western Australia (hereafter called 'the Society') has considered the additional information provided in relation to the subdivision of Lot 123 Mortimer Road Casuarina (EPA Assessment 2254) and provides the following submission on its findings.

The Society has also drawn on information made available to it both through the EPA website and information provided to it by its members. Having concluded its investigation, the Society is firmly of the belief that the land proposed for the subdivision is of such significance as a representation of the Banksia Woodland type present, habitat for Critically Endangered flora and fauna, and Matters of National Environmental Significance. This combination reflected in the completeness of the habitat and the presence of such natural values within a single block of vegetation has led the Society to conclude that subdivision of Lot 123 should not be permitted to proceed. Indeed, the Society contends that the Minister for Environment should be advised that Lot 123 should be purchased by the State and added to the conservation estate under the management of the Department of Biodiversity, Conservation and Attractions.

Communications from members of the Society indicates Lot 123 is:

- The best representation of the Banksia woodland type on the Swan Coastal Plain (pers. comm. Dr Mark Brundett, 25 November, 2023);
- The population of *Thelymitra variegata* is the only known population within the Perth region and consists of less than 100 plants;
- The variations in species number and numbers of individual species recorded between the proponent's botanists and the independent Tauss survey is consistent with the standard of survey and reporting evidenced from several projects reviewed by the Society.
- Clearing of Lot 123 would threaten the persistence of the orchid species on the site through the removal of pollinators as a result of clearing.

On that basis the Society is recommending that clearing of the site should not be allowed to proceed.

The site contains the Endangered Threatened Ecological Community (TEC) - Banksia Woodlands of the Swan Coastal in good to excellent condition over an area of 38.28 ha. Of that area, 32.34 ha contained the even more endangered TEC SWA Floristic Community Type (FCT) 20a: *Banksia*



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attenuata woodlands over species-rich, dense shrublands which are of very high conservation significance given that:

- SWA FCT 20a is listed as a Critically Endangered TEC under both the WABC Act 2016 and is also recognized, under the EPBC Act, as a rare subunit of the general Banksia Woodland of the Swan Coastal Plain Endangered TEC.
- Lot 123 contains the southern, geographical range end of the SWA FCT 20a TEC.
- Lot 123 contains the most beta-diverse vegetation of any SWA FCT 20a occurrence, regionally as there are other four other FCTs (21a, aff. S17, 4 and 5) within this bushland.
- Lot 123 contains the largest and most representative occurrence of the TEC sub-regionally i.e. south of the Swan River
- Lot 123 contains the most highly representative occurrence of the FCT 20a TEC sub-regionally, i.e. south of the Swan River
- Lot 123 contains the best condition and the best ecologically-connected occurrence of SWA FCT 20a regionally.

The Approved Conservation Advice for this TEC is 'PROTECT the ecological community to prevent its further loss of extent and condition'. On that basis, given the excellent condition and high conservation value of the TEC, the Society further contends that Lot 123 should not be allowed to be cleared and subdivided.

Lot 123 is also home to 0.33 ha of the TEC – Assemblages of organic (Tumulus) Mound Springs listed as Critically Endangered under both the EPBC Act and WABC Act. This area is linked to the wetlands to the west within the adjacent rural residential subdivision covering an overall area of 10.87 ha. The whole area is critical forage and breeding habitat for the MNES listed cockatoo species. These wetlands are classed as Resource Enhancement wetland. However, its criticality to the conservation of Black Cockatoos warrants its upgrade to a Conservation Category wetlands.

Lot 123 has survived in its current condition for over 65 years with little or no maintenance. It has remained in excellent vegetation condition and its conservation values are the result of its capacity to sustain itself. Its condition is better than most other sites in metropolitan Perth.

The Society considers that the condition of this vegetation and the rare and endangered flora and fauna that it supports do warrant the refusal to approve the subdivision of Lot 123 Mortimer Road Casuarina by the EPA. Further the exceptional condition of this vegetation and the rarity of the flora and fauna within it warrants its acquisition by the State as part of the Conservation Estate managed by the Department of Biodiversity, Conservation and Attractions.

The Society Looks forward to opportunity to participate in further discussions regarding the future of this unique piece of bushland prior to any decision by the Minister for the Environment.



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