



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

6 March 2024

Office of the Appeals Convenor  
Level 22 Forrest Centre  
221 St Georges Terrace  
PERTH WA 6000

### **Re: CPS 10249/1 Eneabba-Coolimba Road, Shire of Carnamah**

The Wildflower Society of Western Australia (hereafter the Society) wishes to lodge an appeal against the issue of Clearing Permit CPS 10249/1 relating to clearing of vegetation on the Eneabba-Coolimba Road in the Shire of Carnamah, as there is still a significant impact on the Priority 4 species, *Banksia elegans*.

International standards adopted under the Convention on Biological Diversity suggest that the *Banksia elegans* population under consideration is in an area that supports greater than or equal to 0.5% of the known population of the species and greater than 5 reproductive units and is therefore considered Vulnerable and triggers the definition of Critical Habitat in this locality. Even with the raised height for pruning, this species may be adversely affected as there is no evidence provided to suggest the species is tolerant to pruning. However, this raised pruning height is not included in the conditions associated with the Clearing Permit issued and must be added.

There is no line-of-sight envelope provided to indicate at what stage, in the entry onto the Eneabba-Coolimba Road, the location of the *Banksia elegans* plants requiring pruning adversely affects the line of site.

The absence of *Paracaleana dixonii* during the surveys conducted in 2023 is not unexpected given the unusual rain patterns experienced in 2023. Observations made by botanist members of the Society indicated it was not unusual for orchid species to be absent in areas where records suggested they would be observed. It is suggested that an extended survey program beyond the standard annual survey over two seasons would be required to confirm the absence of this species with any certainty.

The presence/absence of *Calytrix chrysantha* in the area could not have been determined as both surveys were outside the flowering time. Also, the presence of *Calytrix enneabensis* may have been missed in the field survey as flowering in the area was early and this species commences flowering in July. Both species grow on the sandy soils in the area and are Priority 4 species.

The safety of the intersection could be improved by placement of a Stop sign at the entry onto the Eneabba-Coolimba Road to avoid rolling through the intersection ahead or across traffic on the road. Combined with a reduced speed limit to 90 kph on the road within 1 km of the entry/egress point to Lake Indoon, this would force those exiting onto the road to establish clearance to proceed prior to



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entry. This is not unreasonable and occurs at many locations in the WA State road network to allow tourist/heavy traffic to re-enter the travelled way, including at:

- Beaufort settlement/roadhouse along Albany Highway between Arthur River and Kojonup; and
- Tenterden along Albany Highway between Cranbrook and Mt Barker.

Members of the Society would suggest that their visitation to the site with the proponent/s and representatives from the Appeals Convenor's office may be useful and result in withdrawal of the appeal should any conditions required to be added to the Clearing Permit can be agreed as this process has been useful in similar projects in the past (Orange Springs Road, Cardup Road and Carrabungup Road).



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

Reference