



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

24 April 2024

Office of the Appeals Convenor

Via email : [admin@appealsconvenor.wa.gov.au](mailto:admin@appealsconvenor.wa.gov.au)

**Re: EPA Assessment Nos. 2176 and 2177 – City of Gosnells TPS 6 Amendments 166 and 169**

The Wildflower Society of Western Australia (hereafter referred to as the Society) has reviewed the findings of EPA Assessment Numbers 2176 and 2177 relating the Amendments 166 and 169 proposed for Town Planning Scheme 6 prepared by the City of Gosnells (hereafter referred to as the City). The Society commends the Environmental Protection Authority (hereafter referred to as the Authority) on its decision to recommend that Amendments 166 and 169 should not proceed. The Society appeals against the conditions proposed by the Authority should the relevant Ministers propose that the Amendments should be implemented.

The Society believes that it is inappropriate for the proponent (the City) to be listed as the Responsible Authority for enforcement of the recommended conditions described in Appendix A and Appendix B. In a sense there appears to be a “Caesar judging Caesar” situation arising on issues that the Authority has identified as “deficient” in comprehensiveness to the extent that insufficient scientific certainty was provided regarding the scale of harm (p.3). Thus the Society considers the City does not have the capacity to undertake or assess studies required to establish the ability of management measures to avoid environmental harm through implementation of the Amendments as proposed. The Society believes the adequacy of management measures, and the scope of associated studies, should be agreed by relevant specialist scientists within the Department of Water and Environmental Regulation (hereafter referred to as DWER) or the Department of Biodiversity, Conservation and Attractions (hereafter referred to as DBCA) as a requirement within the Conditions described in both Appendix A (p. 77) and Appendix B (p. 94) of the Report.

In the review of the offsets proposed, the Society is concerned that the offsets proposed do not offer a net gain in vegetation, consistent with the State Native Vegetation Policy. It is our contention that offsets based on existing native vegetation result in a net loss of vegetation. To achieve a net gain, revegetation is required. To complete revegetation, a revegetation plan should be made available which describes the location, soil types, species available to revegetate each soil type and a discussion of the species able to be seeded and those that will require seedling planting. A determination of the overall percentage of total species expected to be seeded/planted compared to known species occurrence for each soil type should also be provided to enable a prediction of the level of completeness of the original vegetation expected to be achieved.

The Society is strongly of the belief that all land between Brook Road and Yule Brook in the Amendment 166 Boundary should be set aside for conservation to complement the overall conservation zone and the isolated remnant properties along Brook Road and Boundary Road be purchased and added to the conservation area. This would allow the closure of Brook Road and the section of Boundary Road with the conservation area and allow the creation of an overall conservation zone with minimal opportunity for edge effects and reduced management requirement.

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The Society looks forward to your comment on the points raised and seeks an opportunity to discuss these further in the near future. We would also appreciate to opportunity to review the formal response to the points we have made prior to any further discussion.



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