

PER request for Subdivision at Goodwood Estate, Lot 9002 (formerly Lot 871) Prowse Road, Capel

PER recommended. This is a significant and unacceptable proposal due to the following significant factors:

1.) The presence of critically endangered species namely *Drakea elastica*.

It appears in this proposal that the critically endangered orchids would be scattered between the building envelop south of Hawley Parkway and east of Prowse Road. A buffer of 3m by 3m as proposed is unacceptable. The orchid has a narrow distribution 'primarily in damp *Kunzea glabrescens* of Banksia Woodland from Cataby to Busselton'. (Mark Brundrett's book)

The orchid has a highly specialised pollination strategy with reliance on a single pollinator species. This means that these orchids need the pollinators and their habitat to be present so they are particularly susceptible to changes in the landscape. The complexity of these orchids' strategy for pollination is extraordinary (variation in floral odour to attract male wasps) and as custodians of the future survival of species we require the EPA to conduct a PER. The variation in the numbers of *Drakea* found over years (2005, 2007, 2008, 2019) is an indication that they do not produce flowers every year. The National Recovery plan for *Drakea elastica* states that '*each plant may not flower each year.*' (DPAW). Already a number of populations have become extinct due to clearing for agriculture and other reasons.

2.) Referral to the federal government (DAWE) has not been done. *Drakea elastica* is endangered under the EPBC Act and Critically Endangered under the state EP Act.

3.) Fragmentation of the occurrences, drainage and possible dewatering are threatening processes. Increased loss and fragmentation of vegetation in an over-cleared region is inconsistent with a clearing principle and with the precautionary principle.

4.) Presence of Banksia Woodlands of the Swan Coastal Plain TEC – under EPBC Act. There is no mention of this in the information provided for the site. The proposal is inconsistent with the Approved Conservation Advice for this endangered TEC under the EPBC Act – to prevent further loss of its extent and condition. The proposal has not been referred to DAWE.

5.) Because cows are grazing in the area and development proposals are before the authorities, urgent action is required to ensure the rare species habitat is protected and cows removed from the site.