

Document Reference: EP21-094(07)—012 SPL

Emerge contact:

29 January 2024

Attention: Native Vegetation Regulation
Department of Water and Environmental Regulation
Locked Bag 10
JOONDALUP WA 6919

PERTH OFFICE
Suite 4, 26 Railway Road
Subiaco
Western Australia 6008

P +61 8 9380 4988
F +61 8 9380 9636
emergeassociates.com.au

Emerge Environmental Services Pty Ltd ABN
57144772510 trading as Emmerge Associates

Delivered by email to: info@dwer.wa.gov.au

Dear Sir/Madam,

CLEARING PERMIT APPLICATION FOR VEGETATION REMOVAL OVER LOT 16, 25 AND 988 VICTORIA ROAD, KENWICK FOR MKSEA DEVELOPMENT

This letter provides supporting information to be read in conjunction with the clearing permit application form and the following attachments (survey area associated with the flora, vegetation and fauna assessments covers the entire Development Application area (9.01ha)).

- **Attachment 1** – *Development Application DAP Plan (GovWA 2023)*
- **Attachment 2** – *Tree Survey, Targeted Flora Survey and Vegetation Advice – Lot 25, 16 and 988 Victoria Road, Kenwick (Emerge Associates 2023)*
- **Attachment 3** – *Basic Fauna and Targeted Black Cockatoo Assessment, Lot 25, 16 and 988 Victoria Road, Kenwick (Emerge Associates 2023)*
- A shape (.shp) file of the native vegetation clearing area has been submitted to Department of Water and Environmental Regulation (DWER) as part of the application.

1 OVERVIEW

Emerge Associates (Emerge) have been engaged by Hesperia ('the applicant') to support the preparation of a clearing permit application which includes flora, vegetation, and fauna surveys. The work undertaken by Emmerge supports the applicant to implement their Development Application (DA) for a warehouse hardstand and incidental office on Lots 25, 16 and 988 Victoria Road, Kenwick (the site), which is within Precinct 1 of the Maddington Kenwick Strategic Employment Area (MKSEA).

The site is bounded by Victoria Road to the northeast, Tonkin Highway to the northwest and industrial development to the south.

The site is approximately 9.01 hectares (ha) in size and the proposed buildings and hardstand cover most of the site. The proposed development has an approved DA to construct and build these structures on the site.

DWER CPS 10437/1 response:

A clearing permit referral for the site was made to DWER in December 2023, to which a response from DWER was issued in January 2024. DWER determined that a clearing permit was required under section 51DA(3) of the *Environmental Protection Act 1986* (the EP Act). It was noted that because a portion of

vegetation proposed to be cleared fell within an ESA, then a clearing permit would then have to apply for the clearing of native vegetation for the whole DA. As such, this application responds to that request.

Clearing Application Summary

The total site area is approximately 9.01 ha in size and comprises 0.46ha of native vegetation to be cleared. A summary of the native vegetation to be cleared is shown below in **Table 1**:

Table 1: Clearing permit area summary and values

Vegetation Value	Clearing area
Total native vegetation clearing footprint area	0.31 ha 0.15 ha (ESA) Total: 0.46 ha
Extent of native vegetation (ha)/ Vegetation communities	BAf: 0.32 ha EtAf: 0.09 ha Cc: 0.04 ha Er: 0.01 ha Non-native: 6.05 ha Non-native eucalypts: 2.5 ha
ESA (yes/no)	Yes (0.15 ha)
Vegetation condition summary	Degraded: 0.46 ha
Wetland areas (CCW and REW or none)	None
Wetland buffers (50m from CCW and REW or none)	N/A
TECs and PECs	None
Black cockatoo foraging habitat (ha)	0.46 ha
Black cockatoo potential breeding trees (number)	Evidence of use: 0 Suitable hollows: 0 No Hollows: 5

- 0.32 ha of native plant community **BAf** is in a 'degraded' condition.
- 0.09 ha of native plant communities **EtAf** is in 'degraded' condition.
- 0.04 ha of native plant communities **Cc** is in 'degraded' condition.
- 0.01 ha of native plant communities **Er** is in 'degraded' condition.
- Of the total native vegetation to be cleared, the following will be impacted:
 - 0.46 ha of moderate - high quality Carnaby's, Baudin's and Forest red-tailed black cockatoo foraging habitat.
 - 5 potential black cockatoo habitat trees. Of these trees, none were identified as having a potentially suitable hollow for breeding purposes. No signs of nesting were identified.

2 INTRODUCTION AND BACKGROUND

The applicant is applying for the proposed clearing of 0.46 ha of native vegetation on Lots 25, 16 and 988 Victoria Road, Kenwick to the Department of Water and Environmental Regulation (DWER).

The site is bounded by Victoria Road to the northeast, Tonkin Highway to the northwest and industrial development to the south (See **Figure 1**). The proposed clearing and development will ultimately support a broader development project, relating to the Maddington Kenwick Strategic Employment Area (MKSEA).

The MKSEA precinct 1 development will support industrial land uses, and the proposed clearing outlined in this clearing permit application will mark the first stages of the industrial development process.

The site is surrounded by existing industrial land uses with scattered remnant vegetation throughout the broader area. The area is currently zoned 'Industrial' under the Metropolitan Region Scheme (MRS), and 'Business Development' zone under the City of Gosnells Local Planning Scheme (LPS) No. 6.

The proposed warehouse, hardstand and incidental office cover most of the site (see **Attachment 1**). The proposed development has an approved DA to construct and build these structures on the site.

Environmental surveys were undertaken by Emerge to support the clearing permit and are discussed further below in **Section 3**.

EPBC approval:

An EPBC referral has been lodged to the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

3 SUMMARY OF ENVIRONMENTAL CONDITIONS

3.1 Clearing application area

The proposed clearing area is 0.46 ha in size and includes scattered native vegetation. The location of the site and associated clearing area is shown in **Figure 1**.

Consideration of the clearing principles in the context of the above clearing is provided in **Section 6**.

3.2 Historical clearing

A review of available historical aerial images (from 1953 onwards) shows that the clearing area has remained largely unchanged in that time (WALIA 2023). Most of the native vegetation within the DA area was removed prior to 1961 and has since either been planted or regrown.

3.3 Flora and vegetation values

A tree, flora and vegetation survey (see **Attachment 2**) was undertaken by Emerge Associates on 10 August 2022, 11 August 2022, 18 October 2022 and 23 February 2023.

The survey was undertaken to determine the presence or absence of threatened and priority flora and ecological communities, identify plant communities and vegetation condition.

Four plant communities were identified within the clearing area. Each plant community is described below and assigned a condition as shown in **Figure 2** and **Figure 3**. The data presented in **Table 2** below is specific to the identified native vegetation values.

No threatened and priority flora or threatened and priority ecological communities (TECs) were identified in site surveys.

Table 2: Vegetation values identified within the clearing permit application area.

Plant community and description	Vegetation condition (Keighery 1994)	Clearing area (ha)
BAf – Low open woodland of <i>Banksia menziesii</i> and <i>Allocasuarina fraseriana</i> over <i>Xanthorrhoea preissii</i> occasional <i>Kingia australis</i> over low grassland and herbland of non-native species.	'Degraded'	0.32
EtAf – Scattered <i>Eucalyptus tottiana</i> trees over low grassland and herbland of non-native species.	'Degraded'	0.09
Cc – Scattered <i>Corymbia calophylla</i> trees over low grassland and herbland of non-native species.	'Degraded'	0.04
Er - Scattered <i>Eucalyptus rudis</i> trees over low grassland and herbland of non-native species.	'Degraded'	0.01
Total		0.46 ha

A tree survey was undertaken and found 33 native trees found within the clearing area and shown in **Figure 4**.

Table 3: Tree species identified within the clearing area

Tree Species	No. to be cleared
<i>Allocasuarina fraseriana</i>	14
<i>Banksia menziesii</i>	1
<i>Corymbia calophylla</i>	8
<i>Eucalyptus todtiana</i>	7
<i>Kingia australis</i>	2
<i>Xanthorrhoea preissii</i>	1

3.4 Fauna values

A basic fauna assessment and targeted black cockatoo assessment surveys were conducted by Emerge for the site and the broader MKSEA area, on 10 August 2022, 11 August 2022, 18 October 2022 and 23 February 2023 to determine suitability of habitat for conservation significant fauna (see **Attachment 3**). The following provides a summary of the fauna values relating to the clearing area.

The basic fauna survey assessed the various habitat types, overall site conditions and the likelihood of the area to provide suitable habitat for conservation significant fauna species. Based on the outcomes of the desktop assessment for the entire MKSEA precinct 1 area, six conservation significant fauna species were considered possible or likely to occur and are summarised in **Table 4** below.

A total of three threatened species were recorded during the survey through foraging evidence including: Carnaby's black cockatoo (EN), Baudin's black cockatoo (EN) and forest red-tailed black cockatoo (VU), and are discussed in further detail below.

Table 4: Conservation significant fauna species recorded within the local area or deemed possible to occur within the application area based on available databases and habitat values identified during site assessment (Emerge Associates 2023a).

Species name	Common name	Status		Habitat description
		WA	EPBC Act	
Birds				
<i>Apus pacificus</i>	Pacific swift	MI	MI	Aerial, migratory species that is most often seen over inland plains and sometimes above open areas, foothills or in coastal areas. Sometimes occurs over settled areas, including towns, urban areas and cities
<i>Calyptorhynchus banksii naso</i>	Forest red-tailed black cockatoo	VU	VU	<i>Eucalypt</i> and <i>Corymbia</i> forests, often in hilly interior. More recently also observed in more open agricultural and suburban areas including Perth metropolitan area. Attracted to seeding <i>Corymbia calophylla</i> , <i>Eucalyptus marginata</i> , introduced <i>Melia azedarach</i> and <i>Eucalyptus</i> spp. trees
<i>Falco peregrinus</i>	Peregrine falcon	OS	-	Mainly found around cliffs along coasts, rivers, ranges and around wooded watercourses and lakes
<i>Zanda baudinii</i>	Baudin's black cockatoo	EN	EN	Mainly eucalypt forests. Attracted to seeding <i>Corymbia calophylla</i> , <i>Banksia</i> spp., <i>Hakea</i> spp., and to fruiting apples and pears

Species name	Common name	Status		Habitat description
		WA	EPBC Act	
<i>Zanda latirostris</i>	Carnaby's black cockatoo	EN	EN	Mainly proteaceous scrubs and heaths and adjacent eucalypt woodlands and forests; also plantations of <i>Pinus</i> spp. Attracted to seeding <i>Banksia</i> spp., <i>Dryandra</i> spp., <i>Hakea</i> spp., <i>Eucalyptus</i> spp., <i>Corymbia calophylla</i> , <i>Grevillea</i> spp., and <i>Allocasuarina</i> spp.
Mammals				
<i>Isoodon fusciventer</i>	Quenda	P4	-	Dense scrubby, often swampy, vegetation with dense cover up to one metre high

The targeted black cockatoo habitat assessment identified 7 habitat trees (trees with a diameter at breast height (DBH) 500 mm or greater) within the clearing area. Two of these trees have been marked for retention. A detailed hollow assessment was undertaken, which found that none of these trees contained potentially suitable hollows. The location of habitat trees are shown in **Figure 5**. No evidence of roosting activity such as droppings, feathers or branch clippings were observed during the black cockatoo habitat assessments.

The 0.46 ha of native vegetation to be cleared was assessed to also represent approximately 0.46 ha of moderate - high quality foraging habitat for the three black cockatoo species. The area of moderate to high quality foraging habitat (detailed in **Attachment 3**) varies based on species (and their individual habitat preferences).

The extent of potential foraging habitat for the black cockatoo species is shown in **Figure 5**, with the highest quality foraging habitat associated with Marri trees scattered throughout the site. Based on the findings from the basic fauna assessment and targeted black cockatoo assessment, the fauna habitat values within the clearing area is generally poor. Whilst the area does contain habitat that could be utilised by the black cockatoo it is not considered significant, particularly in the context of the proportion of the available habitat in nearby areas (Korung National Park).

3.5 Wetlands

A review of the *Geomorphic Wetlands on the Swan Coastal Plain* dataset, maintained by the Department of Biodiversity, Conservation and Attractions (DBCA) (DBCA 2020) indicates there are no wetlands located within the site. A conservation category wetland (CCW) (UFI 15115) is located approximately 415m south from the site.

4 APPLICATION OF MITIGATION HIERARCHY

In accordance with *A guide to the assessment of applications to clear native vegetation* (DER 2014), the impact mitigation sequence has been considered as part of the proposed clearing, in order to ensure the environmental impact was kept to a minimum.

4.1 Avoidance

The applicant initially planned to clear 7 potential nesting trees, this has reduced the 5 trees, with the potential to retain 2 or 3 trees adjacent to Tonkin Highway.

The DA requires landscaped areas bordering the site, which will create a buffer between development and the adjacent bushland to the east (See **Attachment 1**).

4.2 Minimise

The DA includes landscaped areas surrounding the site, which may be able to incorporate vegetation into the landscaping that supports black cockatoo foraging habitat.

While there are no areas of Public Open Space included on the DA plans (as it is an industrial development), there may be opportunities to retain native vegetation (selected trees) in car park and admin outdoor areas.

5 PLANNING INSTRUMENTS AND OTHER ENVIRONMENTAL APPROVALS

The DA was considered by the Metro Outer JDAP at its meeting held on 17 August 2023, where in accordance with the provisions of the City of Gosnells Town Planning Scheme No.6, it was resolved to approve the application as per the attached notice of determination.

In accordance with regulation 8 of the Planning and Development (Development Assessment Panels) Regulations 2011, the application for planning approval was granted on 17 August 2023, subject to a range of conditions as outlined in **Attachment 1**.

6 RESPONSE TO EP ACT CLEARING PRINCIPLES

Under Section 51C of the EP Act, clearing of native vegetation is an offence unless a clearing permit has been obtained or an exemption applies. When assessing clearing permit applications, DWER has regard to the ten clearing principles contained in Schedule 5 of the EP Act so far as they are relevant to the matter under consideration.

In support of this clearing application, the ten clearing principles have been assessed and detailed below:

Principle (a) – Native vegetation should not be cleared if it comprises a high level of biological diversity.

The clearing area is in the Swan Coastal Plain region of Western Australia, which is an area recognised for its high biological diversity. Based on the results of the flora and vegetation assessment undertaken by Emerge in 2023, the application area has been significantly disturbed through historic activities. The application area contains four plant communities and cleared areas ranging from ‘degraded’ to ‘completely degraded’ condition as shown in **Figure 2** and **Figure 3**.

At a regional scale, vegetation complex mapping undertaken by Heddle *et al.* (1980) indicates the native vegetation proposed to be cleared as comprising the ‘Guildford complex’, which is described as vegetation ranging from open forest to tall open forest of *E. calophylla* - *E. wandoo* - *E. marginata* and woodland of *E. wandoo* (with rare occurrences of *E. lane-poolei*). Minor components include *E. rudis* - *M. raphiophylla*.

The site is contained within the ‘SWA02’ or Perth subregion, which is characterised as mainly containing *Banksia* low woodland on leached sands with *Melaleuca* swamps where ill-drained; and woodland of *Eucalyptus gomphocephala* (tuart), *E. marginata* (jarrah) and *Corymbia calophylla* (marri) on less leached soils (Beard 1990). This subregion is recognised as a biodiversity hotspot and contains a wide variety of endemic fauna species.

The proposed clearing does not represent the above vegetation complexes as the plant communities are in a degraded to completely degraded condition due to historical clearing.

No threatened or priority flora species, nor threatened or priority ecological communities have been identified within the clearing area.

Due to the level of historical disturbance, the native vegetation is considered to be in a ‘degraded’ condition, and the limited fauna habitat present within the application area (particularly compared to the broader location), the clearing area does not support a high level of biological diversity.

The proposed clearing is therefore not likely to be at variance with Principle (a).

Principle (b) – Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.

The fauna assessment (Emerge Associates 2022) observed three species of conservation significance (Carnaby’s cockatoo, Baudin’s cockatoo and Forest red-tail black cockatoo) occurring within the survey area, while a further three conservation significant fauna species were deemed likely or possible to occur based on observed habitat (see **Attachment 3**). The fauna habitat identified within the site includes scattered trees and shrubs of planted native and non-native trees in amongst degraded patches of *Banksia* spp, shrubs with weedy understory, lacking microhabitats for small ground dwelling fauna.

Given degraded nature of the native vegetation within the application area, the vegetation is primarily used by widespread native and non-native fauna species with non-specific habitat requirements. The overstory native vegetation species provide suitable habitat for black cockatoos.

Potential impacts related to Baudin’s, Carnaby’s and the Forest red-tailed black cockatoos, is outlined below.

[Black cockatoo foraging habitat](#)

The native vegetation under application contains approximately 0.46 ha of foraging habitat for the three black cockatoo species. The area of moderate to high quality foraging habitat (explained in further detail in **Attachment 3**) varies based on species (and their individual habitat preferences), but includes approximately:

- 0.46 ha of moderate - high quality Carnaby's, Baudin's and Forest red-tailed Black Cockatoos foraging habitat

The extent of potential foraging habitat for black cockatoo species to be cleared is shown in **Figure 5**

For the purposes of this application, 'high' foraging value is characterised as areas with 50% of known primary food sources and moderate between 10% and 50% as defined by Emerge Associates (Emerge Associates 2023a), and is based on the assessment of the vegetation identified during the detailed surveys.

The foraging habitat within the native vegetation clearing area, does not represent a significant area of habitat for the three black cockatoo species. The foraging habitat within the clearing area extends over a narrow area and there are areas of potential foraging habitat located immediately adjacent to the clearing area.

Potential black cockatoo breeding and roosting habitat

The clearing area contains 5 black cockatoo habitat trees (trees with diameter at breast height (DBH) \geq 50 cm). The habitat trees comprised five *Corymbia calophylla* (Marri) trees. None of the hollows inspected were considered suitable for black cockatoos.

The location of the habitat trees is shown in **Figure 5**.

No evidence of roosting such as branch clippings, droppings or feathers were observed within the application area.

As none of the habitat trees contain hollows suitable for use by black cockatoos for breeding, the application area does not currently provide breeding habitat for any of the three species of black cockatoo. The habitat trees within the clearing area have the potential to form suitable hollows in the future. However, it is likely to take many decades for hollows to form that are large enough to be suitable for use by black cockatoos.

Consideration of habitat within the application area in the context of the location and surrounding habitat

Black cockatoos occur within the area under application and broader area, with known roosting sites for the three species, and a breeding site for Carnaby's within 12 km this area.

The removal of native vegetation as proposed in this application, is unlikely to result in a significant residual impact to the three black cockatoo species. Based on a review of publicly available native vegetation data there is significant areas of foraging, roosting and breeding habitat for the three black cockatoo species within 12 km of the application area.

It is unlikely that clearing associated with this application would result in significant impact to fauna habitat necessary for the maintenance of fauna indigenous to Western Australia. Therefore, the proposed clearing is not likely to be at variance with Principle (b).

Principle (c) – Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, rare flora.

There are no records of threatened or priority flora occurring within the application area. The flora and vegetation survey did not identify any threatened or priority flora.

The native vegetation proposed to be cleared is in a degraded condition (0.46ha) and is unlikely to support threatened or priority flora species.

Therefore, proposed clearing is not at variance with Principle (c).

Principle (d) – Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of a threatened ecological community.

As outlined in **Section 3.3**, the tree, flora and vegetation assessment confirmed that the plant communities identified within the application area do not represent a threatened ecological community (TEC) or priority ecological community (PEC).

As no TECs or PECs have been identified the application area, the proposed clearing is not at variance with Principle (d).

Principle (e) – Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.

The native vegetation clearing area is located within the Swan Coastal Plain Biogeographic Regionalisation for Australia (IBRA) region. The Swan Coastal Plain IBRA region has approximately 39.84% of its pre-European (1750) vegetation extent remaining, of which 10.77% is protected. (Government of Western Australia 2019).

The native vegetation clearing area is mapped within the 'Guildford Complex', with an estimated 18.4% of the pre-European vegetation extent remaining on the Swan Coastal Plain (Government of Western Australia 2018). The clearing area comprises 0.0001 % (0.46 ha) of the remaining 'Guildford complex'.

The vegetation proposed to be cleared is in a 'degraded' condition (see **Figure 3**) and is not considered a significant remnant of native vegetation. A review of aerial imagery indicates that extensive areas of native vegetation exist within the local area and its removal would not be a significant change in this context.

The proposed clearing is not likely to be at variance with Principle (e) given the small area being cleared in the context of the surrounding vegetation.

Principle (f) – Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.

No Ramsar wetlands or defined rivers were identified within or near the application area based.

A review of the Geomorphic Wetlands on the Swan Coastal Plain dataset (DBCA 2020) indicates that no wetlands were identified within or close to the site. As such the principle does not apply.

The proposed clearing is not at variance with Principle (f).

Principle (g) – Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.

A review of soil landscape mapping (DPIRD 2018) indicates that the majority of the native vegetation under application is within the 'Forrestfield System', which is described as 'undulating foot slopes of the Darling and Whicher Scarps. Duplex sandy gravels, pale deep sands and grey deep sandy duplexes'. (DPIRD 2019).

Salinity mapping (DPIRD-09) indicates the application area and surrounding area is mapped as <3% a moderate to high salinity risk or is presently saline, with a groundwater salinity of 250-500mg/L (DWER 2018).

Any risk of land degradation will be mitigated through controls applied during clearing and construction processes (such as dust suppression, mulching, erosions control and silt traps as required).

The proposed clearing is therefore not likely to be at variance to Principle (g).

Principle (h) – Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.

The proposed clearing is not expected to have an impact on any surrounding areas of conservation significance. The nearest area of conservation significance is a CCW (UFI 15115) located approximately 415m south from the site, with an existing industrial development between the site and the CCW.

The DA highlights landscaped areas bordering the site, which will create a buffer between development and surrounding bushland to the west and east which are not subject for clearing.

The proposed clearing is not at variance to Principle (h).

Principle (i) – Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.

The area under application is located within an area classified as having low- moderate risk of Acid Sulfate Soils occurring within 3m of the surface.

Issues that could cause a deterioration in water quality in relation to the clearing footprint have been considered as part of the design and can be managed, and therefore the proposed clearing is not likely at variance with Principle (i).

Principle (j) – Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.

The clearing of 0.46 ha native vegetation in this location is not likely to cause or exacerbate the incidence or intensity of flooding.

The proposed clearing is not likely to be at variance with Principle (j).

7 SUMMARY

The clearing area under application contains 0.46 ha of native vegetation to be cleared.

The clearance area contains:

- 0.32 ha of native plant community **Baf** is in a 'degraded' condition.
- 0.09 ha of native plant communities **EtAf** is in 'degraded' condition.
- 0.04 ha of native plant communities **Cc** is in 'degraded' condition.
- 0.01 ha of native plant communities **Er** is in 'degraded' condition.
- Of the total native vegetation to be cleared, the following will be impacted:
 - 0.46 ha of moderate - high quality Carnaby's, Baudin's and Forest red-tailed black cockatoo foraging habitat.
 - 5 potential black cockatoo habitat trees. Of these trees, none were identified as having a potentially suitable hollow for breeding purposes. No signs of nesting were identified.

A summary of the clearing principles has been provided in **Table 5**.

Given the above, the proposed clearing of 0.46 ha of native vegetation on Lots 25, 16 and 988 Victoria Road, Kenwick is considered to have a very low environmental impact in accordance with section 51DA of the *Environmental Protection Act 1986*.

EPBC approval:

An EPBC referral has been submitted lodged to the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

Table 5: Summary of response to each clearing principle

Clearing principle	Levels of variance	Response to clearing permit principle
Principle (a)	Not likely at variance	The native vegetation within the clearing area has been assessed as being in a 'degraded' condition (0.46 ha). Due to the highly degraded nature of the vegetation, the small extent of the clearing, the presence of weeds, the lack of threatened or priority flora, and the lack of high-quality fauna habitat, the native vegetation clearing area is not considered to represent a high level of biological diversity.
Principle (b)	Not likely at variance	The native vegetation clearing area is not likely to provide significant habitat for conservation significant fauna (or more common and widespread fauna species) given the small scope of vegetation and fauna habitat, and the presence of more extensive areas nearby. The three black cockatoo species were identified as key conservation significant species that could be impacted by the proposed clearing. The native vegetation to be cleared includes 0.46 ha of moderate - high quality Carnaby's, Baudin's and Forest Red-tail foraging habitat, and 5 potential future habitat trees for the three black cockatoo species. It is unlikely the three black cockatoo species are reliant on native vegetation within the clearing area as significant habitat.
Principle (c)	Not at variance	No state or commonwealth listed threatened or priority flora species have been recorded within the application area or are considered likely to occur given the highly degraded nature of the vegetation.
Principle (d)	Not at variance	No state or commonwealth listed threatened or priority ecological communities have been identified within the clearing area or are considered likely to occur.
Principle (e)	Not likely at variance	The proposed clearing of native vegetation is in degraded condition. The native vegetation clearing area comprises 0.0001 % (0.46 ha) of the remaining local extent (90,513 ha) of the Guildford vegetation complex and therefore would not significantly change the remaining extent. The vegetation in the application area is not considered to be significant as a remnant.
Principle (f)	Not at variance	The proposed clearing is not at variance with Principle (f) given that no geomorphic wetlands or watercourses were identified within the site.
Principle (g)	Not likely at variance	The proposed clearing is not at variance with Principle (g) given that the proposed clearing will not cause appreciable land degradation.
Principle (h)	Not at variance	No areas of conservation significance are located within the site or nearby.
Principle (i)	Not likely at variance	The proposed clearing is not considered to pose a risk in terms of the deterioration of surface or groundwater given the drainage and erosion design included as part of the proposed works
Principle (j)	Not at variance	The proposed clearing is not likely to cause or exacerbate a risk of flooding given the extent of works and design measures to be implemented to manage surface water.

Should you have any questions regarding the content of this letter, please do not hesitate to contact me on 0468895368.

Yours sincerely

Emerge Associates

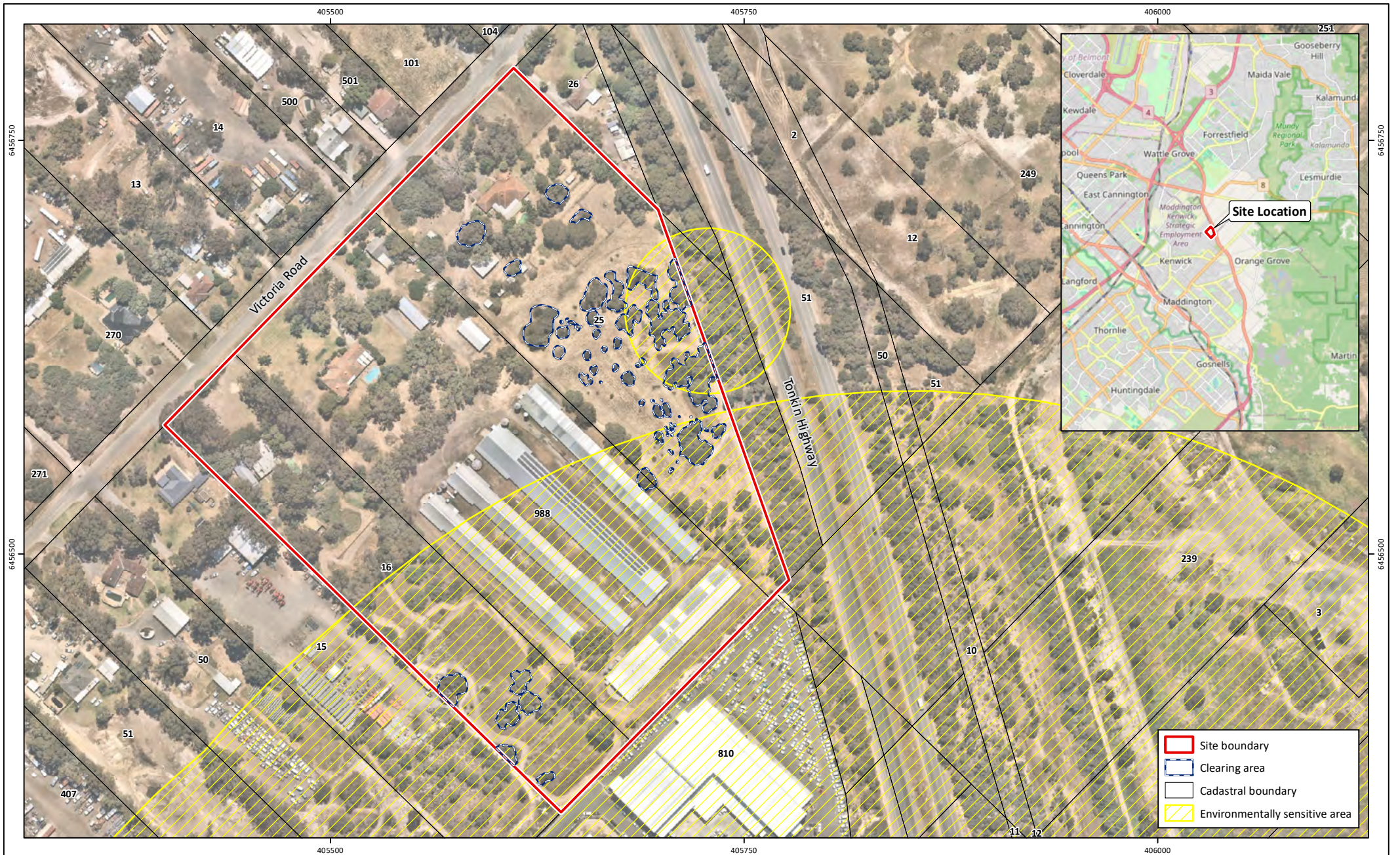
- Encl: Attachment 1 – Development Application DAP Plan (Concept 2023)
Attachment 2 – *Tree Survey, Targeted Flora Survey and Vegetation Advice – Lot 25, 16 and 988 Victoria Road, Kenwick* (Emerge Associates 2023)
Attachment 3 – Basic Fauna and Targeted Black Cockatoo Assessment, Lot 25, 16 and 988 Victoria Road
Figure 1: Site Boundary
Figure 2: Vegetation Units
Figure 3: Vegetation Condition
Figure 4: Development Impacts – Native Vegetation
Figure 5: Development Impacts – Black Cockatoo Habitat

General References

- Department of Biodiversity, Conservation and Attractions (DBCA) 2020, *Geomorphic Wetlands, Swan Coastal Plain (DBCA-019)*.
- Department of Environment Regulation (DER) 2014, *A guide to the assessment of applications to clear native vegetation under Part V Division 2 of the Environmental Protection Act 1986*, Perth.
- Department of Primary Industries and Regional Development (DPIRD) 2018, *Soil Landscape Mapping - Systems (DPIRD-027)*.
- Department of Primary Industries and Regional Development (DPIRD) 2019, *Soil Landscape Mapping - Best Available (DPIRD-027)*, Perth, WA.
- Department of Water and Environmental Regulation (DWER) 2018, *Groundwater Salinity Statewide (DWER-026)*, Perth, Western Australia <<https://catalogue.data.wa.gov.au/dataset/groundwater-salinity-statewide>>.
- Emerge Associates 2022, *Basic Fauna and Targeted Black Cockatoo Assessment - Lot 822 Youle-Dean Road, Brabham, EP21-131(28)--078 NAW, Version 1*.
- Emerge Associates 2023a, *Basic Fauna and Targeted Black Cockatoo Assessment - Part Ferguson Road, Ferguson, EP22-044(02)--002A NAW, A*.
- Emerge Associates 2023b, *Detailed Flora and Vegetation Assessment Lots 25, 16 and 988 Victoria Rd Kenwick, EP21-094(05)--011 TAA, 1*.
- Government of Western Australia 2018, *Statewide Vegetation Statistics incorporating the CAR Reserve Analysis (Full Report). Current as of December 2017*, WA Department of Biodiversity, Conservation and Attractions, Perth.
- Government of Western Australia 2019, *2018 South West Vegetation Complex Statistics. Current as of March 2019*, WA Department of Biodiversity, Conservation and Attractions, Perth.
- Heddl, E. M., Loneragan, O. W. and Havel, J. J. 1980, 'Vegetation Complexes of the Darling System Western Australia', in Department of Conservation and Environment (ed.), *Atlas of Natural Resources Darling System Western Australia*, Perth.
- Keighery, B. 1994, *Bushland Plant Survey: A guide to plant community survey for the community*, Wildflower Society of WA (Inc), Nedlands.
- Western Australian Land Information Authority (WALIA) 2023, *Landgate Map Viewer Plus*.

Online References

- Department of Water and Environmental Regulation (DWER) 2020c, Perth Groundwater Map, viewed July 2020, <https://maps.water.wa.gov.au/#/webmap/gwm>

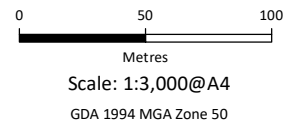


- Site boundary
- Clearing area
- Cadastral boundary
- Environmentally sensitive area

Figure 1: Site and Clearing Area Location

Project: Clearing Permit Application
 Lots 16, 25 and 988 Victoria Road, Kenwick
Client: Hesperia Property Pty Ltd

Plan Number:
 EP21-094(07)--F34a
Drawn: GAR
Date: 29/01/2024
Checked: SPL
Approved: LR
Date: 29/01/2024



While Emerge Associates makes every attempt to ensure the accuracy and completeness of data, Emerge accepts no responsibility for externally sourced data used
 ©Landgate (2023). Nearmap Imagery date: 30/09/2022



	Site boundary
	Clearing area
	Cadastral boundary
Vegetation unit	
	BAf (0.32 ha)
	Cc (0.04 ha)
	Er (0.01 ha)
	EtAf (0.09 ha)
	Non-native (6.05 ha)
	Non-native eucalypts (2.50 ha)

Figure 2: Vegetation Units

Project: Clearing Permit Application
 Lots 16, 25 and 988 Victoria Road, Kenwick
Client: Hesperia Property Pty Ltd

Plan Number:
 EP21-094(07)--F37a
Drawn: GAR
Date: 29/01/2024
Checked: SPL
Approved: LR
Date: 29/01/2024



0 50 100
 Metres
 Scale: 1:3,000@A4
 GDA 1994 MGA Zone 50



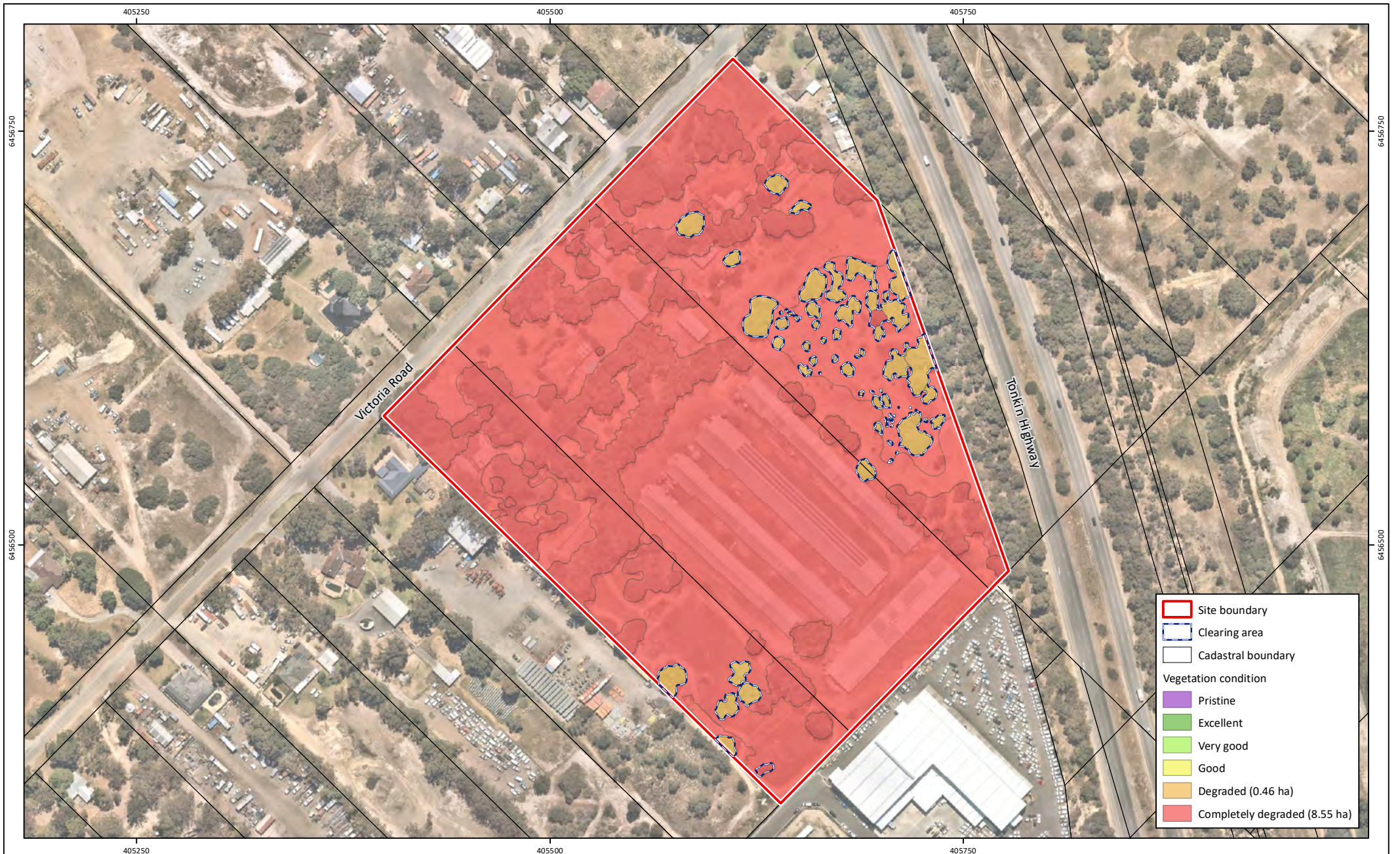


Figure 3: Vegetation Condition

Project: Clearing Permit Application
 Lots 16, 25 and 988 Victoria Road, Kenwick
Client: Hesperia Property Pty Ltd

Plan Number:
 EP21-094(07)--F38a
Drawn: GAR
Date: 29/01/2024
Checked: SPL
Approved: LR
Date: 29/01/2024



0 50 100
 Metres
 Scale: 1:3,000@A4
 GDA 1994 MGA Zone 50



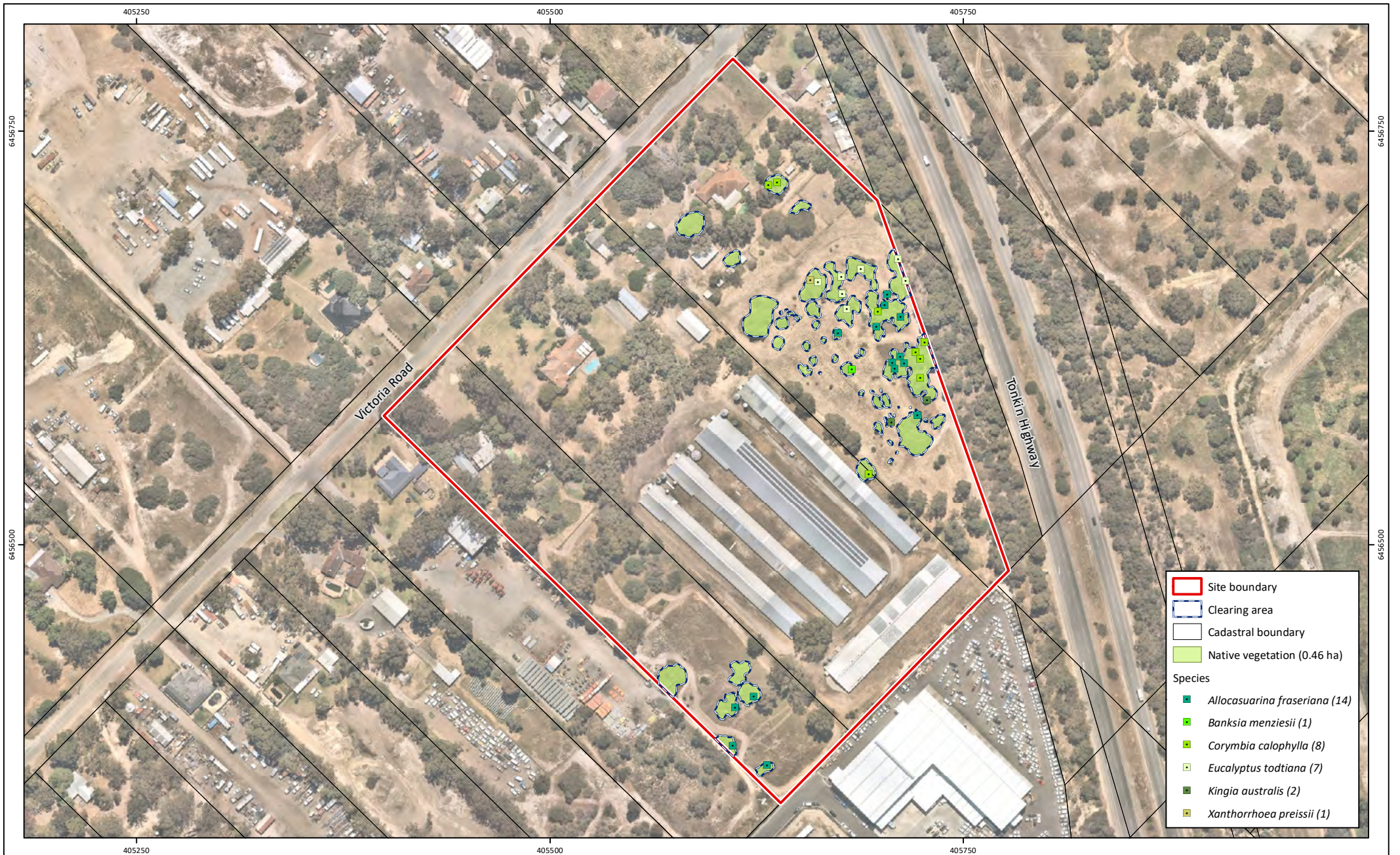


Figure 4: Development Impacts - Trees

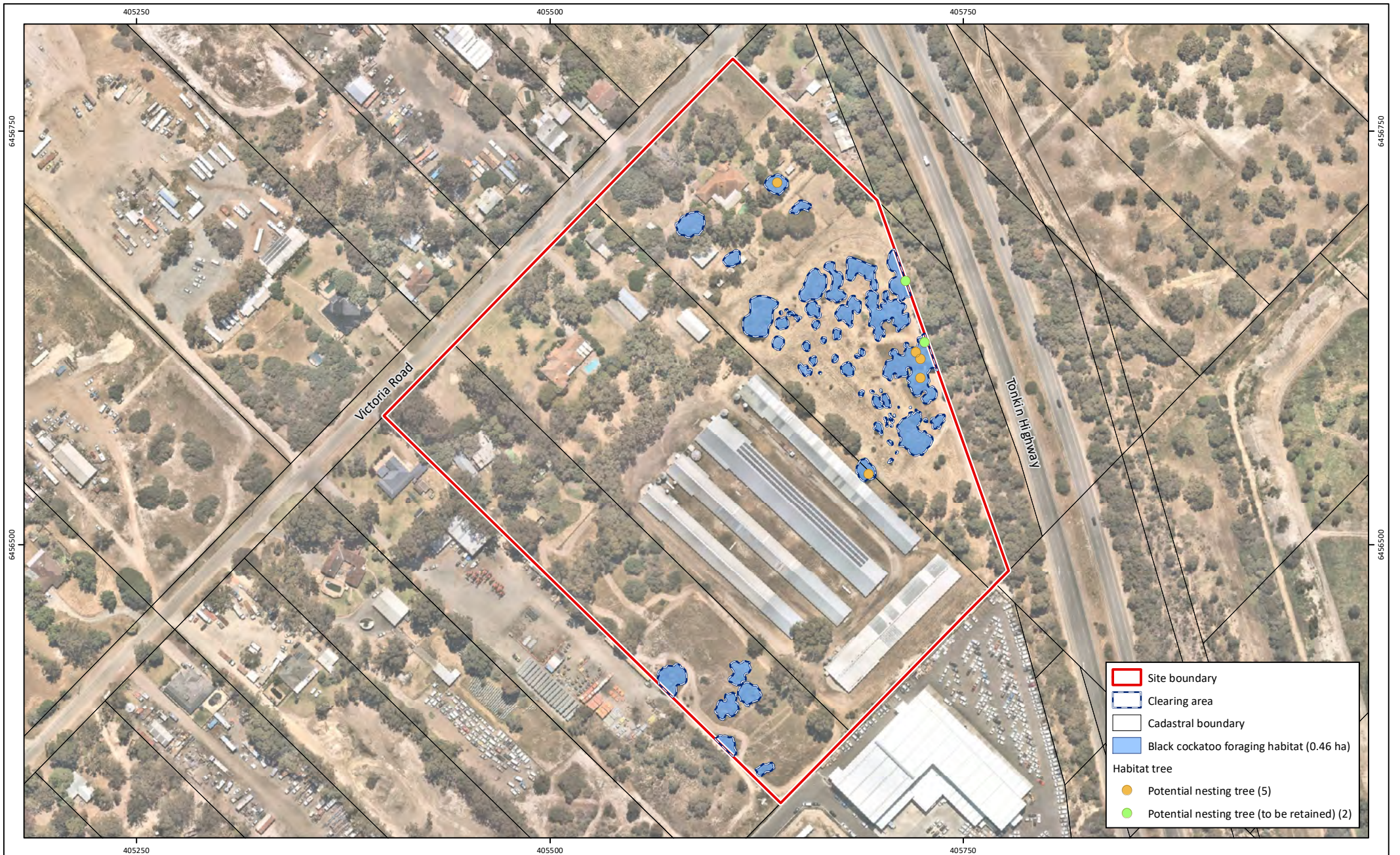
Project: Clearing Permit Application
 Lots 16, 25 and 988 Victoria Road, Kenwick
Client: Hesperia Property Pty Ltd

Plan Number:
 EP21-094(07)-F35a
Drawn: GAR
Date: 29/01/2024
Checked: SPL
Approved: LR
Date: 29/01/2024



0 50 100
 Metres
 Scale: 1:3,000@A4
 GDA 1994 MGA Zone 50



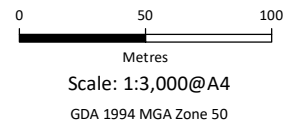


	Site boundary
	Clearing area
	Cadastral boundary
	Black cockatoo foraging habitat (0.46 ha)
Habitat tree	
	Potential nesting tree (5)
	Potential nesting tree (to be retained) (2)

Figure 5: Development Impacts - Black Cockatoo Habitat

Project: Clearing Permit Application
 Lots 16, 25 and 988 Victoria Road, Kenwick
Client: Hesperia Property Pty Ltd

Plan Number:
 EP21-094(07)--F36a
Drawn: GAR
Date: 29/01/2024
Checked: SPL
Approved: LR
Date: 29/01/2024



While Emerge Associates makes every attempt to ensure the accuracy and completeness of data, Emerge accepts no responsibility for externally sourced data used ©Landgate (2023). Nearmap Imagery date: 30/09/2022