

Wednesday, 22 January 2025



Our Ref: P24.096-MEM-NVCP\_A.0\_DRAFT



Name

Company      Multiplex

Email:

## **Assessment Against the 10 Clearing Principles: 3000 Busselton Highway, Bunbury Health Campus**

This information is provided as supporting documentation to assist with the Native Vegetation Clearing Permit Application (Purpose or Area Permit) for 3000 Busselton Highway, Bunbury Health Campus (the Site). Western Environmental Approvals Pty Ltd (WEPL) has undertaken this work at the request of the development contractor Multiplex on behalf of the landowner Department of Health. The Site occurs within the area surrounding Bunbury Hospital at Southwest Health Campus.

This assessment is informed by a detailed Biological Surveys completed by WEPL (2024). This assessment is provided as Attachment A.

This supporting document presents a preliminary assessment against the '10 Clearing Principles' in accordance with the Department of Water and Environmental Regulation (DWER) *A guide to the assessment of application to clear native vegetation* (DWER 2014). The assessment is supported by a Biological Survey and subsequent report undertaken by WEPL in 2024.

### **Outcome of Assessment Against the 10 Clearing Principles**

The proposed Clearing Area comprises 0.52 ha of .Fringing Wetland vegetation that is considered to be in Degraded condition. The vegetation includes a mix of planted native vegetation that is less than 20 years old.

An assessment of the potential clearing of native vegetation against the Ten Native Vegetation Clearing Principles contained in Schedule 5 of the *Environmental Protection Act, 1986* (EP Act) is provided in Table 1.

The proposed clearing within the Clearing Area is not at variance with any of the clearing principles.

**Table 1: Assessment Against 10 Clearing Principles for 3000 Busselton Highway, Bunbury Health Campus.**

Assessment Results	Data Source/Tools for Assessment	Conclusion									
<p><b>Principle (a) - Native vegetation should not be cleared if it comprises a high level of biological diversity.</b></p> <p>The Clearing Area occurs within the Swan Coastal Plain Interim Biogeographic Regionalisation for Australia (IBRA), located approximately 157.5 kilometres (km) south-west of the Perth Central Business District, within the City of Bunbury.</p> <p>Detailed Fauna, Flora and Vegetation Surveys were undertaken, between August and October 2024 by WEPL.</p> <p>No Threatened and Priority flora species within the Clearing Area were identified during the field Surveys or were considered likely to occur under the post survey assessment.</p> <p>No Threatened Ecological Community (TEC) and Priority Ecological Community (PEC) were identified within the Clearing Area.</p> <p>One native vegetation type was identified within the Clearing Area 'Planted lake fringing (Native Veg)' (VT04) with a vegetation condition of 'Degraded'. The vegetation in the Clearing Area is described as *<i>Eucalyptus camaldulensis</i>, <i>Casuarina obesa</i> and <i>Agonis flexuosa</i> low woodland over <i>Melaleuca teretifolia</i>, <i>Kunzea glabrescens</i> and *<i>Acacia longifolia</i> tall shrubland over <i>Machaerina juncea</i>, *<i>Briza maxima</i>, *<i>Fumaria capreolata</i> mid open sedgeland/open tussock grassland/open forbland. This vegetation was previously cleared in 2001. The Clearing Area now contains a mix of plantings of non-endemic West Australian native species and Bunbury region endemic species. A significant portion of vegetation present is natural regeneration by endemic species that have established from adjacent bushland (likely from drainage inflows).</p> <p><b>Vegetation Condition Extent Summary in Clearing Area</b></p> <table border="1" data-bbox="203 1278 974 1423"> <thead> <tr> <th>Condition</th> <th>Extent (ha)</th> <th>% of Clearing Area</th> </tr> </thead> <tbody> <tr> <td>Degraded</td> <td>0.52</td> <td>100</td> </tr> <tr> <td><b>Total</b></td> <td><b>0.52</b></td> <td><b>100</b></td> </tr> </tbody> </table>	Condition	Extent (ha)	% of Clearing Area	Degraded	0.52	100	<b>Total</b>	<b>0.52</b>	<b>100</b>	<ul style="list-style-type: none"> <li>• Protected Matter Search Tool (PMST) (DCCEEW, 2023).</li> <li>• Threatened Ecological Communities (DBCA-038).</li> <li>• Threatened and Priority Flora (DBCA-036).</li> <li>• Priority Ecological Communities list WA Version 35 (DBCA,2023).</li> <li>• Western Australian Herbarium (WAH, 1998) records.</li> <li>• Australia's Bioregions (DCCEEW, 2021).</li> <li>• Field survey.</li> </ul>	<ul style="list-style-type: none"> <li>• Unlikely to be at variance.</li> </ul>
Condition	Extent (ha)	% of Clearing Area									
Degraded	0.52	100									
<b>Total</b>	<b>0.52</b>	<b>100</b>									

Assessment Results	Data Source/Tools for Assessment	Conclusion
<p>The low native flora species diversity and Degraded vegetation condition within the Clearing Area does not indicate high levels of biodiversity, and therefore the proposed clearing is unlikely to be at variance with this principle.</p>		
<p><b>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</b></p>		
<p>The field surveys and desktop assessment identified six conservation significant vertebrate fauna species as occurring, or having a high or medium likelihood of occurrence in the overall Clearing Area. Species include:</p>		
<ul style="list-style-type: none"> <li>• <i>Pseudocheirus occidentalis</i> (western ringtail possum) - CE</li> <li>• <i>Isoodon fusciventer</i> (quenda) - P4</li> <li>• <i>Calyptorhynchus banksia naso</i> (forest red-tailed black cockatoo) – VU.</li> <li>• <i>Calyptorhynchus baudinii</i> (Baudin's black cockatoo) – EN.</li> <li>• <i>Calyptorhynchus latirostris</i> (Carnaby's black cockatoo) - EN</li> <li>• <i>Phascogale tapoatafa wambenger</i> (southwestern brush-tailed phascogale) - CD</li> </ul>	<ul style="list-style-type: none"> <li>• Threatened and Priority Fauna List (DBCA,2023b).</li> <li>• Carnaby's Cockatoo Confirmed Roost Sites (DBCA-050).</li> <li>• Carnaby's Cockatoo Confirmed Breeding Areas (DBCA-054).</li> <li>• Black Cockatoo Roosting Sites (DBCA-064).</li> <li>• Protected Matters Search tool (DCCEEW, 2023).</li> </ul>	<ul style="list-style-type: none"> <li>• Unlikely be at variance.</li> </ul>
<p>The Clearing Area comprises 0.52 ha of core habitat for western ringtail possum and supporting habitat for quenda, southwestern brush-tailed phascogale and foraging habitat for black cockatoo species. Western ringtail possum and black cockatoos are discussed below.</p>		
<p><b>Black Cockatoo Species</b></p> <p>The Clearing Area falls within the modelled distribution and breeding range for Baudin's black cockatoo, Carnaby's black cockatoo and the forest red-tailed black cockatoo.</p>		

Assessment Results	Data Source/Tools for Assessment	Conclusion
<p>Foraging evidence (chewed marri nuts) for all three species was recorded during the field survey. Foraging evidence or observation of individuals were recorded at one location for Baudin's black cockatoo, Carnaby's cockatoo and forest red-tailed cockatoo. The native vegetation of FHT-01 contains foraging species for all three black cockatoo species.</p> <p>No evidence of current or previous nesting behaviour such as chew marks at hollow entrance attributed to black cockatoos, or flushed individuals were recorded. Three potential nesting tree, a River Red Gum, was identified within the Clearing Area, however, they did not contain a suitable hollow.</p> <p>Known roost sites are present &lt;6km from the Clearing Areas, with one buffer zone intersecting with the Clearing Area. No evidence of scat marking, branch clipping or feather dropping was recorded suggesting that the location is not a highly frequented roosting location. Within the Clearing Area there are no isolated stands of tall (&gt;10 m) eucalyptus to provide suitable night roosting habitat.</p>		
<p><b>Western Ringtail Possum</b></p> <p>Four Western Ringtail Possum Spotlight observations (across two separate nights of survey), and 10 Drey/Nest observations were made within the Clearing Area. FHT-01 (native vegetation) was assessed as comprising core habitat, with individuals recorded in these habitat types. A total of 0.52 ha habitat for Western Ringtail Possum habitat is included within the Clearing Area.</p> <p>As presented in the Western Ringtail Possum Recovery Plan (DPaW, 2017) home range of individuals is variable based on habitat with larger ranges averaging 2.7ha reported in jarrah forest and smallest average ranges of 0.4-0.3ha in better quality peppermint woodland habitat. Further it is reported that western ringtail possum generally use between two and seven refuges (such as dreys) in their home range, but can use an average of 20 or more refuges over a year (DPaW, 2017).</p>		

Assessment Results	Data Source/Tools for Assessment	Conclusion
<p>The removal of 0.52 ha of habitat is therefore considered unlikely to comprise the entirety of an individual home range or refuge (dreys or hollow) sites. The removal of habitat in the Clearing Area is also considered unlikely to increase fragmentation or limit dispersal. The Clearing Area comprises the west bank of a ring of habitat circling the constructed wetland. The continuous habitat to the south, east and north remains connected allowing dispersal and access to larger areas of habitat to the east and north.</p>		
<p><b>Principle (c) - Native vegetation should not be cleared if it includes or is necessary for the continued existence of, rare flora</b></p>		
<p>The Department of Biodiversity, Conservation and Attractions (DBCA) database and Commonwealth PMST searches identified 66 conservation listed flora species as occurring within 20 km of the Clearing Area or with suitable habitat potentially occurring in the region. No previous records are present within the Clearing Area.</p> <p>No Threatened and Priority flora species were identified within the Clearing Area during the field Surveys, nor were considered likely to occur under the post survey assessment.</p> <p>The proposed clearing is therefore unlikely to be at variance with this principle.</p>	<ul style="list-style-type: none"> <li>• Protected Matters Search tool (DCCEEW, 2023).</li> <li>• Threatened and Priority Flora (DBCA-036).</li> <li>• Priority Ecological Communities list WA Version 35 (DBCA-2023).</li> <li>• Field survey.</li> </ul>	<ul style="list-style-type: none"> <li>• Unlikely to be at variance.</li> </ul>
<p><b>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</b></p>		
<p>The field survey conducted by WEPL in 2024, concluded that native vegetation within the Clearing Area is not representative of any TEC/PEC.</p> <p>The native vegetation present within the Clearing Area does not comprise whole or part of, nor is it likely to be necessary for the maintenance of a TEC. Consequently, the proposed clearing is not likely to be at variance with this principle.</p>	<ul style="list-style-type: none"> <li>• Threatened Ecological Communities (DBCA-038).</li> <li>• Field survey.</li> </ul>	<ul style="list-style-type: none"> <li>• Unlikely to be at variance.</li> </ul>
<p><b>Principle (e) - Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been significantly cleared</b></p>		
<p>The Clearing Area is within a constrained area (Swan Coastal Plain). Regional vegetation for the Swan Coastal Plain (at vegetation complex level) was mapped by Heddle et al. (1980) and are maintained in digital form by DBCA (2018).</p>	<ul style="list-style-type: none"> <li>• Beard (1990).</li> <li>• Pre-European Vegetation dataset (DPIRD-006).</li> </ul>	<ul style="list-style-type: none"> <li>• Unlikely to be at variance.</li> </ul>

Assessment Results	Data Source/Tools for Assessment	Conclusion
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The Survey Area intersect two vegetation complexes:

- Karrakatta Complex-Central and South (49)- Predominantly open forest of *Eucalyptus gomphocephala* (Tuart) - *Eucalyptus marginata* (Jarrah) - *Corymbia calophylla* (Marri) and woodland of *Eucalyptus marginata* (Jarrah) - Banksia species. *Agonis flexuosa* (Peppermint) is co-dominant south of the Capel River.
- Yoongarillup Complex (56)- *Eucalyptus marginata* (Jarrah) - *Corymbia calophylla* (Marri). South of Bunbury is characterized by *Eucalyptus rudis* (Flooded Gum) - Melaleuca species open forests.

The vegetation complexes identified from the Survey Area (Heddle et al, 1980) and the pre-European and current extents are listed in the Table below (DBCA, 2018).

#### Pre-European Regional Vegetation Complexes

Vegetation Complex Name	System Mapping Unit Number	Original Extent (ha)	Current Extent (ha)	% Remaining	% Managed for Conservation
Karrakatta Complex-Central and South	49	53,080.99	12,465.24	23.48	3.87
Yoongarillup Complex	56	27,977.93	10,018.14	35.81	13.95

Due to the Degraded condition of the Clearing Area, the low native species diversity and the prevalence of planted non endemic species within the Clearing Area, it is considered that the vegetation is not representative of an significant remnant in a significantly cleared area.

The proposed clearing is therefore unlikely to be at variance with this principle.

Assessment Results	Data Source/Tools for Assessment	Conclusion
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**Principle (f) - Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or a wetland**

The Clearing Area shown in Figure 1 is mapped as a 'Multiple Use' category wetland (UFID 15492) (DBCA-019).

This are no watercourses mapped within the Clearing Area. There is no vegetation associated with watercourses or wetlands noted within or in the vicinity of the Clearing Area. There are no nationally significant wetlands within a 15 km radius of the Clearing Area.

The native vegetation within the Clearing Area is growing in association with a constructed wetland built as part of hospital construction as a drainage basin. Although a wetland is present the Degraded condition, prior clearing and 'Multiple Use' category wetland classification makes it unlikely that the wetland retains significant values.

Therefore, the proposed clearing is considered unlikely to be at variance to this principle.

- Geomorphic wetlands, Swan Coastal Plain (DBCA-019).

Unlikely to be at variance.

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

The Clearing Area is situated on the Spearwood S4c phase, which is characterised by flat to gently undulating sandplain with deep, yellow-brown or dark brown siliceous sands that are seasonally inundated. Soils of this nature generally have a high permeability and therefore are unlikely to contribute to on-site/off-site run-off. As the soil type is predominantly sand, it is less likely to be prone to water and/or wind erosion due to the particle size. Additionally, waterlogging is unlikely due to the nature of these soils.

The mapped average annual rainfall in the local area, according to the Australian Bureau of Meteorology, is 716.4 mm. The Clearing Area resides on flat ground and therefore is unlikely to heavily contribute to a potential for wind/water erosion and on-site/off-site runoff.

- Australian Bureau of Meteorology (2023).
- Soil Landscape Mapping Best Available dataset (DPIRD-027).
- Groundwater Salinity Statewide dataset (DWER-026).

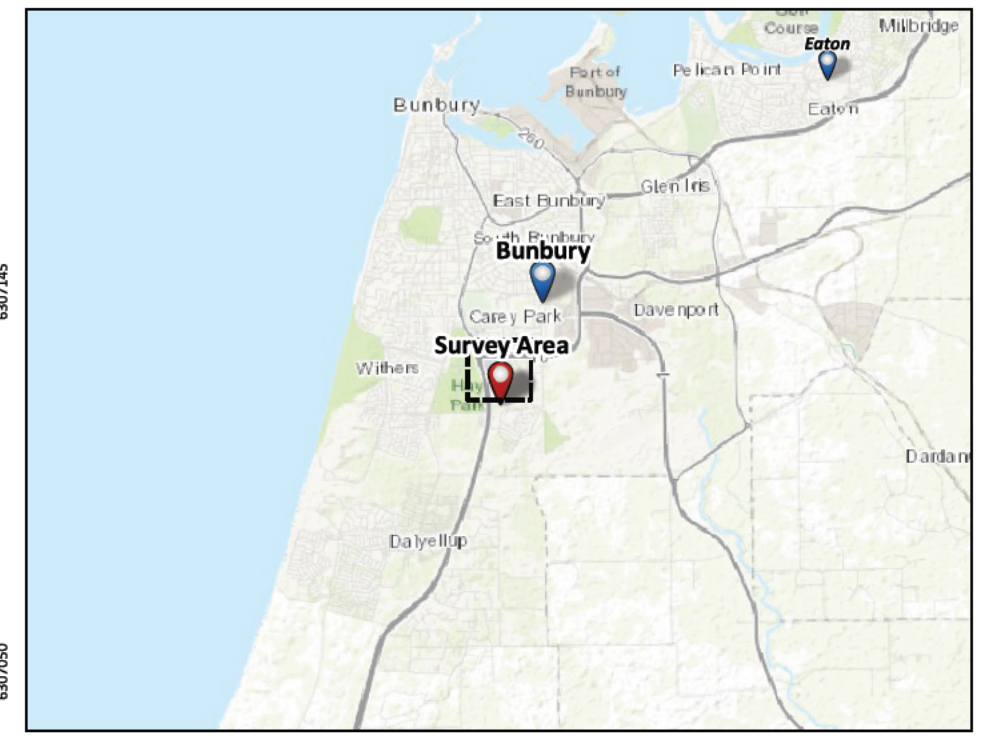
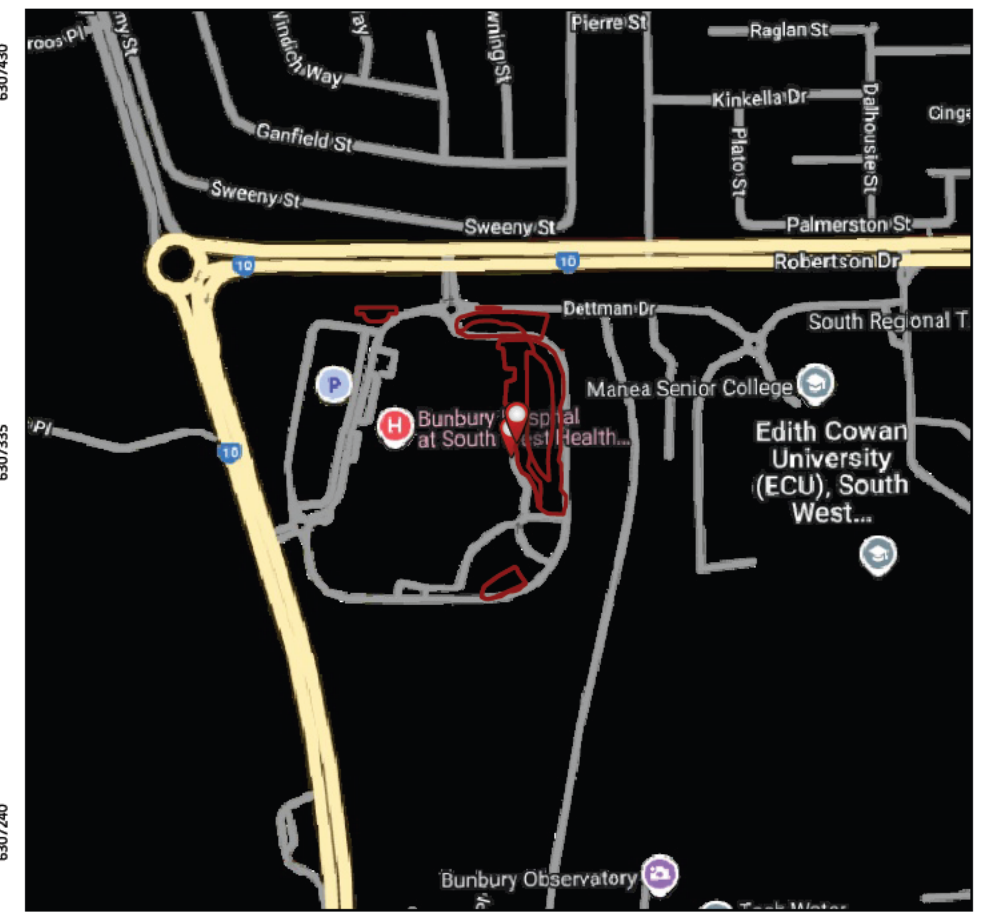
Unlikely to be at variance.

Assessment Results	Data Source/Tools for Assessment	Conclusion
<p>The Clearing Area is mapped as having a Moderate to Low probability of Acid Sulfate Soils (ASS) occurring. Localised soil acidity is unlikely to occur as a result of exposure of pyritic material to air and rainfall as a result of clearing.</p>		
<p>The closest groundwater conductivity reading to the Clearing Area identified 2300mS/m, therefore, if there is a rise in the water table, there is a potential risk of salinisation. However, given the sparsity of vegetation present and the largely cleared nature of the Clearing Area, any additional clearing is not expected to have any significant impact on water table levels or salinisation.</p>		
<p>The potential clearing will expose a small area to the potential for increased erosion; however, the locality and conditions render the eventuation of serious erosion, nutrient transport to sensitive receptors or alteration to any surrounding surface water regimes (none noted in Clearing Area vicinity) are unlikely. Given the small area of proposed clearing and the nature of soils within the Clearing Area, it is unlikely that appreciable land degradation will result and therefore the proposed clearing is unlikely to be at variance with this clearing principle.</p>		



Assessment Results	Data Source/Tools for Assessment	Conclusion
<p><b>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</b></p>		
<p>The Clearing Area is not located within a Conservation Reserve or Environmental Sensitive Area.</p> <p>There are two Environmental Sensitive Areas intersecting the Clearing Area (ID 9943 and 17038) are not ecologically linked.</p> <p>The distance to a Conservation Reserve or an Environmental Sensitive Area that is not ecologically linked means that proposed clearing is unlikely to be at variance to this principle.</p>	<ul style="list-style-type: none"> <li>• Site visit.</li> <li>• Environmentally Sensitive Areas dataset (DWER-046).</li> <li>• Aerial photography.</li> </ul>	<p>Unlikely to be at variance.</p>
<p><b>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</b></p>		
<p>The Clearing Area falls within a P3 Public Drinking Water Source Area. The vegetation within the Clearing Area is used as a buffer of a wetland, however the wetland was constructed as a drainage basin and currently receives runoff from carparks and road network via drains. The vegetation to be cleared is not currently having a significant filtration effect, therefore, the removal of the vegetation within the Clearing Area will not modify the existing drainage system, or cause deterioration.</p> <p>Given the previous land clearing of the Clearing Area, the additional clearing is unlikely to result in significant changes to the water table and there for the Project is unlikely to be at variance with this principle.</p>	<ul style="list-style-type: none"> <li>• Public Drinking Water Source Areas (DWER-033).</li> <li>• RAMSAR Sites (DBCA-010).</li> </ul>	<ul style="list-style-type: none"> <li>• Unlikely to be at variance.</li> </ul>
<p><b>Principle (j) - Native vegetation should not be cleared if the clearing of the vegetation is likely to cause or exacerbate the incidence or intensity of flooding.</b></p>		
<p>Most of the Clearing Area falls within a 'Multiple Use' category wetland (UFID 15492), with a 'Conservation' category wetland (UFID 916) intersecting the southern boundary of the Clearing Area.</p> <p>The soil and conditions onsite show &gt;70% of the Spearwood S4c phase system is Moderate to Very Highly susceptibility to waterlogging or generating surface water run-off. With 10-30% of soil system Low to Extremely Low soil water storage.</p>	<ul style="list-style-type: none"> <li>• Soil Landscape Mapping Best Available dataset (DPIRD-027).</li> <li>• A guide to the assessment of applications to clear</li> </ul>	<ul style="list-style-type: none"> <li>• Unlikely to be at variance.</li> </ul>

Assessment Results	Data Source/Tools for Assessment	Conclusion
<p>The Department of Environment and Regulations document “a guide to the assessment of applications to clear native vegetation” states the following for Principle (j): “Consideration of this principle may require extensive modelling of the whole catchment and should only be considered for large clearing projects. For smaller applications, clearing should not cause waterlogging (localised flooding).”</p> <p>Given the very low vegetation clearing proposed within the Clearing Area, additional clearing is unlikely to increase or exacerbate the incidence of waterlogging or localised flooding.</p> <p>The proposed clearing is therefore unlikely to be at variance with this principle.</p>	<p>native vegetation (DWER,2014).</p> <ul style="list-style-type: none"> <li>• PMST (DCCEEW, 2023).</li> </ul>	



**Figure 1: Project Area**

		<b>PROJECT/REPORT NAME</b> Bunbury Health Campus Multiplex EPBC Referral 3000 Busselton Highway, Busselton- Bunbury Health Campus		<b>Legend</b> Project Area Clearing Area Avoidance Area		<table border="1"> <thead> <tr> <th>No</th> <th>Description</th> <th>Drawn</th> <th>Approved</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Original issue</td> <td>JP</td> <td>MM</td> <td>15/1/2025</td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		No	Description	Drawn	Approved	Date	A	Original issue	JP	MM	15/1/2025															
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A	Original issue	JP	MM	15/1/2025																												
<b>SCALE</b> 1:1,890	<b>SHEET SIZE</b> A3 COLOUR	<b>CLIENT</b> Multiplex		<b>Legend</b> (continued)		<b>NOTES:</b> Cadastral boundary (LGATE-002), Base map ESRI Topo, Townsites (LGATE-248).																										
<b>COORDINATE REFERENCE SYSTEM</b> GDA2020 / MGA zone 50		<b>PROJECT NUMBER</b> P24.096	<b>VERSION</b> 0	<b>CLIENT</b> (continued)																												
<b>DATA SOURCE</b> LANDGATE AERIAL IMAGERY NOW		<b>DRAWN BY / REVIEWED BY</b> JP/MM	<b>DATE</b> 15/1/2025	<b>CLIENT</b> (continued)		Designed and Automated by AC																										

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