4 March 2025

Dave McKenna
Senior Technical Officer Design & Asset Management
City of Busselton
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Dear Dave,

RE: (SW621) Gunn Street, City of Busselton: Clearing Permit application

The City of Busselton ('the City') proposes to carry out road, kerbing and drainage upgrade work to improve the safety of Gunn Street, West Busselton, within the City of Busselton. To accommodate the works, selective clearing of individual Peppermint trees *(Agonis flexuosa*) will be required.

This cover letter has been prepared to provide background and supporting information for a Clearing Permit application required under *section 51E* of the *Environmental Protection Act 1986* (draft attached).

A preliminary assessment against the clearing principles indicates the project is not at or not likely to be at variance to any of the 10 clearing principles.

The following information is attached:

- **Attachment 1** Proposal background and assessment against the 10 clearing principles
- **Attachment 2** Draft Clearing (Area) Permit Application

If you have any enquiries regarding this letter, please contact me on 0437 700 917.

Yours sincerely,
Shane Priddle

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ATTACHMENTS
Attachment 1 Proposal background and assessment against the 10 clearing principles
Attachment 2 Draft Clearing (Area) Permit Application

ATTACHMENT 1

BACKGROUND

Proposal background

The City of Busselton ('the City') proposes to carry out road, kerbing and drainage upgrade works to improve the safety of Gunn Street, West Busselton, within the City of Busselton. To accommodate the works, selective clearing of up to four individual Peppermint trees *(Agonis flexuosa*) will be required (herewith referred to as 'clearing area'). The location of the proposal and associated clearing area are shown in Figures 1 and 2 respectively.

The clearing area is within the existing Gunn and Craig Street road reserves. As the clearing of native vegetation is required, the City will be submitting a Clearing Permit (Area Permit) application to the Department of Water and Environmental Regulation (DWER). The City has considered a range of measures to avoid, minimise, mitigate and manage proposed clearing impacts, documented below. A preliminary assessment of the residual impacts of clearing are provided against the 10 clearing principles, also below.

The clearing will include a maximum of four *Agonis flexuosa* trees, with one of these likely to be retained. The total proposed clearing canopy area is 0.02 ha. To mitigate the proposed clearing, planting is proposed in an area between the upgraded Gunn Street cul de sac head and Craig Street. This planting will improve the connectivity of the vegetation within adjacent Reserve 27067 and other remnant vegetation to the east of the proposed clearing footprint.

Basic desktop and site assessments have been completed to assess the baseline biodiversity values along the road verge. These have been used to guide the project design and inform the Clearing Permit application. Proposed flora, fauna and vegetation impacts were assessed during a site inspection by SW Environmental (Shane Priddle , Principal and Kelly Paterson Senior Botanist) on 19th December 2024.

Summary of the flora, fauna and vegetation values

Key flora, fauna and vegetation values of the proposed clearing area are listed below:

- The vegetation within the proposed clearing footprint is in a Completely Degraded condition (Keighery, 1994), and does not represent any Threatened or Priority Ecological Communities.
- The vegetation within the Survey Area consists of *Agonis flexuosa* over introduced grasses (Photos 1 and 2) and is no longer representative of remnant native vegetation (SLIP 2025). The remnant trees requiring clearing are not within the mapped Native Vegetation Extent ((Landgate, 2025) DPIRD-005).
- No Threatened, Priority or otherwise considered significant flora taxa occur within the Survey Area.
- Other activities within the proposed clearing area that do not require a clearing permit include pruning and clearing of several planted shrubs of non-endemic *Callistemon* sp. and *Agonis flexuosa* 'Nana' cultivars (Photo 3).
- There were no suitable Diameter at Breast Height trees (>50cm DBH) within the area under application and no trees with potential to be used by black cockatoo[1] for breeding. There was no

[1] Black cockatoos collectively refers to

- Forest Red-tailed Black-Cockatoo (*Calyptorhynchus banksii subsp. naso*) (Vulnerable)
- Baudin's Cockatoo (*Zanda baudinii*) (Endangered)
- Carnaby's Black Cockatoo (*Zanda latirostris*) (Endangered)

evidence of black cockatoo roosts or foraging within the clearing area, broader road reserve or adjacent vegetation.

- Critically Endangered Western Ringtail Possums (*Pseudocheirus occidentalis*) (WRPs) occur within the proposed clearing area. An authorised fauna spotter should be present prior to and during clearing to manage WRP and other fauna. Impacts to WRP are considered low due to the small scale and nature of clearing, retention of most of the habitat patch and proposed revegetation of existing cleared areas.
- It is unlikely that the proposed clearing area would provide significant habitat for any other conservation significant fauna.
- Reserve 27067, a C Class Reserve vested with the City of Busselton for Public Recreation (Photos 3 and 4) abuts the proposed clearing area to the north. This reserve includes a larger patch of vegetation including *Agonis flexuosa* and *Eucalyptus gomphocephala* (Tuart - planted), provides a larger habitat patch to any locally occurring fauna.

Photo 1 – Peppermint *(Agonis flexuosa)* trees proposed for removal as part of this application.

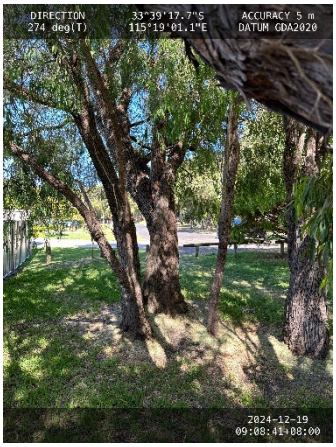

Photo 2 - Peppermint (*Agonis flexuosa*) trees proposed for removal as part of this application. The tree to the rear right will be retained if possible.

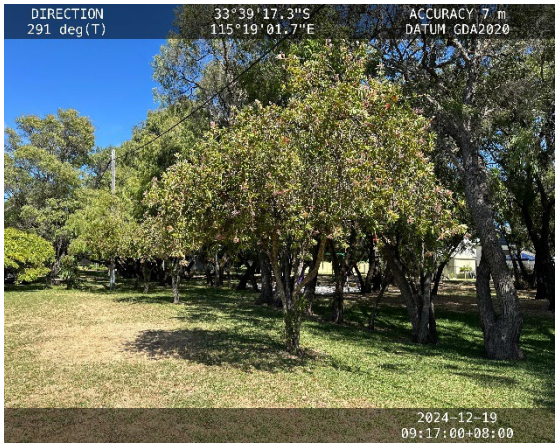

Photo 3 - Planted *Callistemon* sp. cultivars within the proposed clearing area (centre foreground), with vegetation that will be retained within Reserve 27067 visible to the far right.

Photo 4 - Reserve 27067 is adjacent to the proposed clearing area and will not be impacted by this proposal.

PRELIMINARY CLEARING ASSESSMENT

Measures to avoid, minimise, mitigate and manage proposed clearing impacts

The City has progressed the project design with an emphasis on avoiding and or minimising impacts to native vegetation. Where impacts cannot be directly avoided, they have been be minimised and or mitigated through design measures. To best protect and enhance the remaining environmental values within the site, the design process included the following measures to directly avoid or minimise impacts on native vegetation:

- Modified the preferred clearing extent to retain additional remnant trees where possible.
- Proposed mitigation of WRP habitat loss via planting of additional *Agonis flexuosa* trees in an area adjacent, providing long term benefits by enhancing the available habitat and ecological connectivity with larger areas of adjacent vegetation.
- Minimised the curb area to avoid adjacent impacts.

In addition to the design mitigation measures the following actions will be undertaken during the construction period:

- An authorised fauna spotter will be present prior to and during clearing due to the potential for WRP to occur.
- Demarcation of vegetation to be retained, or retained wherever possible, to avoid unnecessary or accidental vegetation impacts.

Preliminary assessment of clearing impacts against the 10 clearing principles

In assessing whether the project is likely to have a significant impact on the environment, the area under application (maximum of four *Agonis flexuosa* / 0.02 m^2 canopy) was assessed against the ten clearing principles (EP Act 1986, Schedule 5). The project is **not** at or **not likely to be** at variance to any of the clearing principles.

Table 1 Brief assessment against the 10 clearing principles

Clearing principle	Preliminary Assessment	Variance
(a) Native vegetation should not be cleared if it comprises a high level of biological diversity.	The vegetation within the clearing area is in Completely Degraded condition (Keighery, 1994), completely lacking in vegetation structure. The vegetation unit identified within the proposed clearing area was: • Peppermint over introduced grasses: *Agonis flexuosa* over introduced grasses (Photos 3 and 4). The structure of the vegetation within the clearing area has been compromised due to previous parkland clearing, establishment of vigorous introduced lawn species and planting of other non-local flora species. The remnant trees requiring clearing are not within the mapped Native Vegetation Extent ((Landgate, 2025) DPIRD-005). The desktop assessment included an interrogation of the DBCA database, which identified one state (only) listed Priority Ecological Communities (PEC) as occurring within five kilometres of the clearing area (DBCA, 2024a): • *Eucalyptus rudis* (flooded gum), *Corymbia calophylla*, *Agonis flexuosa* Closed Low Forest (near Busselton) – Priority 1 (WA).	Not at variance

	This community does not occur within the clearing area– the vegetation is Completely Degraded and does not represent a Priority Ecological Community, or other vegetation of significance. Stream Environment and Water completed a flora and vegetation survey in 2022 in the area immediately adjacent to the clearing area, no Priority ecological communities were recorded. The results of the interrogation of the DBCA database identified 25 priority flora species occurring within five kilometres of the project (DBCA, 2024b). Stream Environment and Water completed a Flora and Vegetation survey in 2022 in the area immediately adjacent to the clearing area, no Priority flora species were recorded. No Priority flora, or other flora of significance, occurs within the road reserve or will be otherwise impacted by the proposed works. SW Environmental completed fauna surveys in 2022 in the area immediately adjacent to the clearing area. No Priority fauna species were recorded. During the current assessment, SW Environmental identified numerous fauna species that may utilise the site periodically or as part of a larger patch. The habitat under application forms such a small potential habitat component, that impacts will negligible. Priority fauna that potentially utilize the clearing area include: • *Isoodon obesulus fusciventer* (Southern Brown Bandicoot) - P4 • *Phascogale tapoatafa* (Southern Brush-tailed Phascogale) S Due to the small area to be cleared, lack of hollow bearing trees, and its disturbed and managed nature, along with the retention of a larger area of habitat within the adjacent reserve, impacts to these species and any other fauna are considered highly unlikely. Due to the Completely Degraded vegetation condition of the area under application, the absence of Priority flora or vegetation communities, and highly unlikely risk of impacts to Priority fauna, the proposed clearing is not at variance to this 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.	There was no evidence of black cockatoo roosts within the clearing area. No clearing of large trees (Diameter at Breast Height (DBH) >50cm) or hollow bearing trees suitable for black cockatoos is proposed. The clearing area also does not include high quality foraging species. The proposed clearing is unlikely to impact Black Cockatoos. The remnant *Agonis flexuosa* trees to be cleared provide habitat for the WRP (Critically Endangered). Two dreys and several scats were recorded during the site assessment on 19th December 2024 within these trees. SW Environmental completed a fauna survey in 2022 in the area immediately adjacent to the clearing area, WRP were recorded from this area also. Impacts to WRP are most likely to be associated with direct impacts such as killing individuals during construction if they were to occur, rather than habitat loss. A suitably licensed fauna spotter will be present prior to and during clearing ensure no direct impacts to fauna (e.g. WRP). Due to the small scale of the proposed clearing (up to four trees with a canopy area of 0.02 m^2), the overall poor fauna habitat quality of the area under application for most threatened fauna and the retention of a larger area of better quality habitat immediately adjacent in the reserve, the proposed clearing is not likely to be at variance to this principle.	Not likely to be at variance

(c) Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, rare flora.	The DBCA database extract identified 10 threatened flora species occurring within five km of the proposal (DBCA, 2024b). Stream Environment and Water completed a Flora and Vegetation survey in 2022 in the area immediately adjacent to the clearing area and no Priority flora species were recorded. During the site assessment on 19th December 2024, it was confirmed that the vegetation within the clearing area is in a Completely Degraded condition, managed parkland comprising *Agonis flexuosa* trees over introduced lawn. There are no Threatened flora species within the clearing area and the proposed clearing is not at variance with this principle.	Not at variance
(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.	The DBCA database interrogation identified two federally listed Threatened Ecological Communities (TECs) as occurring within five km of the clearing area – • Banksia Woodlands of the Swan Coastal Plain ecological community – (Endangered (Cth) / Priority 3 (WA); and • Subtropical and Temperate Coastal Saltmarsh – Vulnerable (Cwth) / Priority 3 (WA). These communities do not occur within the clearing area– the vegetation is Completely Degraded and does not represent any Threatened Community, or other vegetation of significance. Stream Environment and Water (2022) did not find any threatened ecological communities in the area immediately adjacent to the clearing area. The proposed clearing is not at variance to this clearing principle.	Not at variance
(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 remnant trees requiring clearing are not within the mapped Native Vegetation Extent ((Landgate, 2025) DPIRD-005). As the vegetation under application is not mapped as remnant vegetation and is in Completely Degraded condition in managed parkland, the clearing impacts proposed are not considered to be at variance to this clearing principle.	Not at variance
(f) Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.	The project does not impact on any drainage lines nor any native wetland vegetation. The clearing proposed is not considered likely to cause any deterioration of surface or underground water. The proposed clearing is not at variance to this principle.	Not at variance
(g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.	The minor clearing associated with the road widening within managed parkland will not cause land degradation. Acid Sulfate Soils (ASS) occur in low-lying coastal areas and are common in water-logged, groundwater-dependant and high-groundwater-table environments. The study area is mapped as Class 2 (2i, p2) risk of ASS (DER, 2010). Class 2 includes moderate to low risk of ASS occurring within 3 m of the natural surface but a high to moderate risk of ASS occurring beyond 3 m. Impacts to ASS will be low due to low volumes of excavation and these areas being filled, with no dewatering proposed. The proposed clearing is not at variance to this principle.	Not at variance

(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 project will not impact on any nearby conservation areas. The nearest conservation areas are the reserves encompassing the Vasse River, approximately 700 m, to the south of the area under application. The clearing area does not have ecological connectivity to this area and will not impact on the environmental values. The proposed clearing is not at variance to this principle.	Not at variance
(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 minor clearing associated with the road, kerbing and drainage upgrade works will not cause any deterioration of surface or underground water. Existing drainage will be maintained through the project design and in line with local government road construction standards. The proposed clearing is not at variance to this principle.	Not at variance
(j) Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.	The minor clearing associated with the road, kerbing and drainage upgrade works will not increase the risk of flooding. The proposed clearing is not at variance to this principle.	Not at variance

References

DBCA. (2024a). *DBCA Threatened and Priority Ecological Communities Database. Database interrogation* [Dataset]. Department of Biodiversity, Conservation and Attractions.

DBCA. (2024b). *DBCA WA Herbarium Specimen and Threatened and Priority Flora (TPFL) Databases. Database interrogation* [Dataset]. Department of Biodiversity, Conservation and Attractions.

Fitzpatrick Rob., Powell, Bernie, Marvanek, Steve. (2011) Atlas of Australian Acid Sulphate Soils. v2. CSIRO. Data Collection

Keighery, B. (1994). *Bushland Plant Survey: A guide to plant community survey for the community*. Wildflower Society of Western Australia.

Landgate. (2025). *Shared Location Information Platform (SLIP)* [Dataset].

ATTACHMENT 2

FIGURE 1. LOCATION

Native vegetation under application

Proposed planting (approximate)

GUNN STREET, CITY OF BUSSELTON

Ref: SW621
Date: 4/03/2025 Author: SP

Source: Base map © Esri and its data suppliers. SLIP Landgate (2024)

A3 @ 1:50000

0 0.25 0.5 1 km

GRID: GDA zone 50

N

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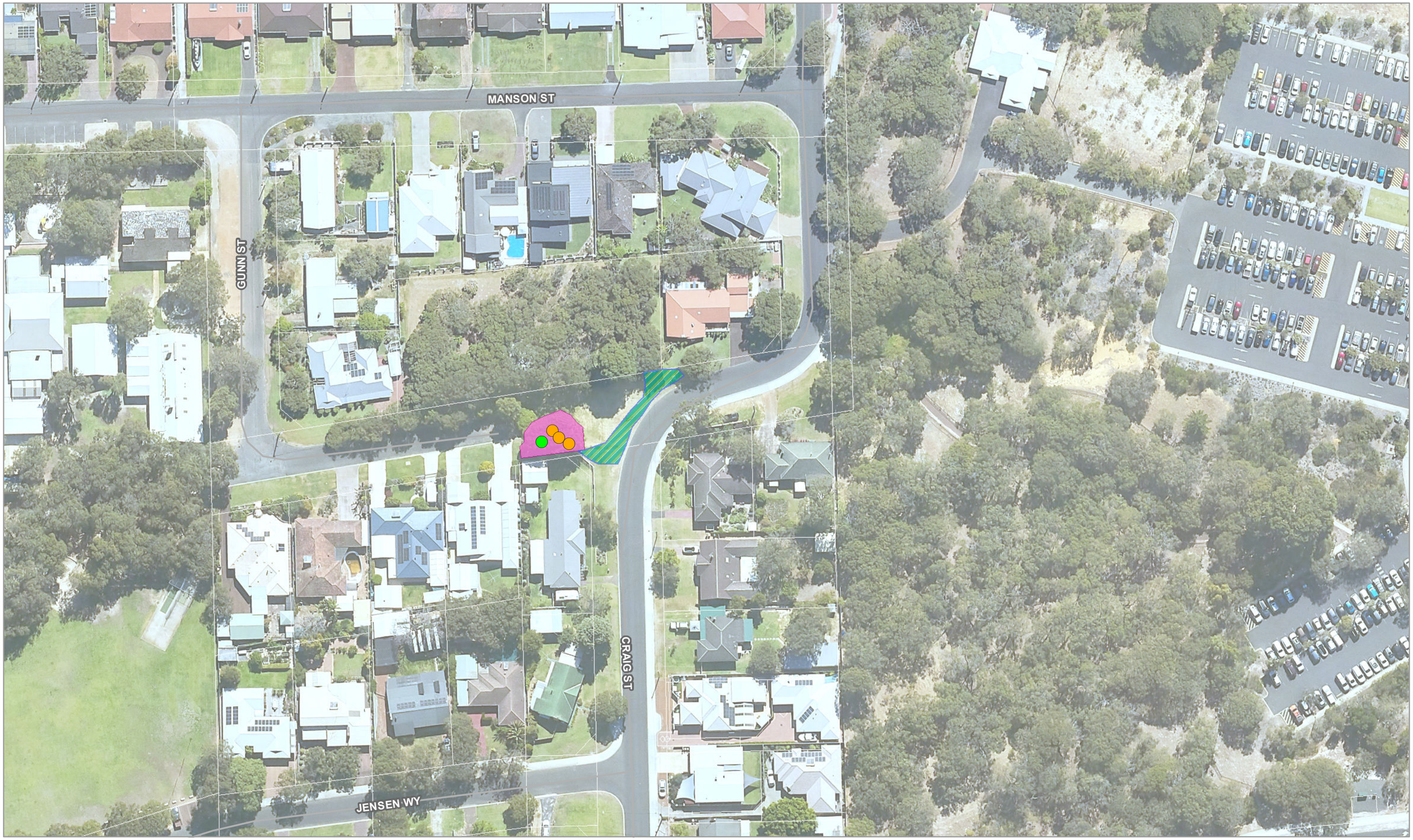

FIGURE 2. STUDY AREA AND PROPOSED CLEARING

GUNN STREET, CITY OF BUSSELTON

Ref: SW621
Date: 4/03/2025 Author: SP

- Tree to be retained if possible
- Trees to be cleared
- Road
- Proposed planting (approximate)
- Native vegetation under application

A3 @ 1:1000

0 5 10 20 m

GRID: GDA zone 50

N

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