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# ATTACHMENT 1: SUPPORTING DOCUMENT

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APA Pilbara Holdings Pty Ltd (APA) is proposing to clear up to 2.4 ha for the installations of two meteorological masts (met masts) (proposed clearing areas). The two locations (eastern and western) are shown in Figure 1 and provided as Attachment 2 .

APA has assessed the proposed clearing against the four criteria outlined in the *Native Vegetation Clearing Referral Guideline* (Guidance) (Department of Water and Environmental Regulation (DWER), 2021) and has determined that the proposed clearing meets all criteria to be considered a native vegetation clearing referral and therefore should not require application of a native vegetation clearing permit.

## ***Criterion 1 – The area proposed to be cleared is small relative to the total remaining vegetation***

Thresholds are provided in the Guidance to help determine if the proposed clearing (2.4 ha) is considered relatively small.

The Guidance separates Criterion 1 thresholds by the following three regions:

- Metropolitan Perth and Greater Bunbury Region Scheme constrained areas;
- The ‘intensive landuse zone’ located in south-west Western Australia (WA); and
- Remaining areas of WA.

The proposed clearing areas are located near Newman and therefore the thresholds and criteria below are for the ‘Remaining Areas of WA’ region.

**Table 1: Thresholds and criteria for Remaining Areas of WA (DWER, 2021)**

Criteria	Threshold	Proposed Clearing	Under the Threshold? (Y/N)
Extent of proposed clearing for each referral	If more than 5 ha is proposed to be cleared (or more than 10 ha if north of the 26° South latitude line), a permit is required.	Only 2.4 ha of clearing is proposed.	Y
Threshold for remaining extent of that native vegetation association or complex in the relevant IBRA bioregion	If less than 30% of that native vegetation association or complex is remaining within the relevant IBRA bioregion, a permit is required.	Clearing is proposed within the Gascoyne Interim Biogeographic Regionalisation of Australia (IBRA) bioregion in vegetation association 216. The pre-European extent of this vegetation association within the Gascoyne IBRA region is 254,089.5 ha. The current remaining extent of this association is 252,864.5 ha, representing 99.5% of its pre-European extent.	Y

Criteria	Threshold	Proposed Clearing	Under the Threshold? (Y/N)
Threshold for remaining native vegetation surrounding the boundary of the proposed clearing	If less than 30% native vegetation is remaining within a 10 km buffer of the proposed clearing, a permit is required.	The pre-European extent of native vegetation within 10 km of the proposed clearing is 48,923.4 ha. The Department of Primary Industries and Regional Development (DPIRD) 2018 native vegetation extent layer does not identify any significant cleared areas within the 10 km of the proposed clearing, with only small areas of clearing associated with pastoral activities. Therefore nearly 100% of native vegetation remains.	Y

***Criterion 2: There are no known or likely significant environmental values within the area***

The Guidance notes DWER will consider the impacts on environmental values, including:

- Biological values (e.g. flora, fauna, ecological communities);
- Conservation values (e.g. impact to ecological linkages, conservation areas, heritage values); and
- Land and water resource values (e.g. wetlands and watercourses, water resources, land and soil quality).

The environmental values listed in the Guidance and the relative considerations are addressed in Table 2.

**Table 2: Environmental values and the consideration as to whether a permit is required.**

Environmental Value	Consideration used to determine if a permit is required	Proposed Clearing
Vegetation condition	The quality of the existing remnant vegetation within and nearby the area to be cleared, based on the Keighery (1994) and/or Trudgen (1988) vegetation condition scales.	Phoenix Environmental Sciences Pty Ltd (Phoenix) completed a detailed flora and vegetation survey in September 2024. Preliminary mapping indicates that all vegetation within the western clearing area (Figure 1) is considered to be in Excellent condition and vegetation within the eastern clearing area (Figure 1) ranges between Very Good to Completely Degraded condition. The proposed clearing areas are part of the Sylvania Pastoral Station and are actively traversed by cattle. Neither clearing area would be considered remnant vegetation, with both sites surrounded by areas of vegetation in similar condition with nearly 99.9% of vegetation remaining as noted under Criterion No. 1. Clearing of up to 1.20 ha of Excellent quality vegetation and 1.20 ha of Completely Degraded to Very Good quality vegetation that is not remnant vegetation is unlikely to have locally or regionally significant environmental impact.
Significant fauna	Whether the proposed clearing area provides habitat for any threatened, priority, or specially protected fauna.	Phoenix completed a desktop review and field assessment in November 2024 and identified 40 significant fauna taxa that may occur across the 18,000 ha survey area, comprising 17 Threatened, Conservation Dependent or Specially Protected fauna species under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth) (EPBC Act) and/or <i>Biodiversity Conservation Act 2016</i> (WA) (BC Act). Sixteen species are listed as Migratory under the EPBC Act and BC Act. A further seven species are listed as Priority by the Department of Biodiversity, Conservation and Attractions. None of the known records were located within the proposed clearing areas.  The clearing areas contain two fauna habitats consisting of spinifex grassland on sandy plain (western clearing area ) and mulga shrubland on stony undulating plain (eastern clearing area). These habitats are widespread across the Pilbara and may contain suitable habitat for significant species however the habitats represent only a very small portion of the local extent and does not represent critical or important habitat for any significant species that may occur. Higher suitability habitat is present outside of the clearing area.
Fauna habitat	Whether the proposed clearing area provides critical habitat for fauna.	No critical habitat was recorded within the clearing areas.

Environmental Value	Consideration used to determine if a permit is required	Proposed Clearing
Significant ecological linkage	Whether the proposed clearing is part of a significant ecological linkage.	There has been very little clearing within 10 km of the clearing areas. The surrounding area remains primarily uncleared with the proposed 2.4 ha of clearing unlikely to have any impact on ecological linkage.
Mapped ecological community	The proximity of the proposed clearing to any threatened ecological communities or priority ecological communities.	No Threatened or Priority Ecological Communities were recorded within the clearing areas.
Significant flora	The proximity of the proposed clearing to any records of threatened or priority flora.	No Threatened or Priority Flora were recorded within the clearing areas.
Mapped wetland	The proximity of the proposed clearing to any wetlands listed under the Convention on Wetlands of International Importance (Ramsar Convention) or the Directory of Important Wetlands in Australia, or wetlands classified as 'conservation category' or 'resource enhancement'.	No wetlands occur within the clearing areas.
Mapped watercourse	Whether the proposed clearing may impact on a watercourse (e.g. the structural stability of a watercourse or deterioration of water quality).	No watercourses occur within the clearing areas.
Water resources (e.g. public drinking water supply areas)	Whether the clearing is in an area with high risk of decreasing water quality, rising groundwater levels, or increasing salinity.	The clearing areas does not occur within any public drinking water areas.
Conservation reserve	Whether the proposed clearing is within a 'conservation reserve' (e.g. Bush Forever; Environmental Protection Policy areas; land managed by the Department of Biodiversity, Conservation and Attractions; Regional Open Spaces; crown reserves vested for conservation purposes).	No conservation reserves occur within the clearing areas.
Land and soil quality	Whether the clearing is in an area with high risk of land and/or soil degradation. Factors to determine this may include (among other matters) contaminated sites records, risk of dieback disease or acid sulfate soils, and susceptibility to erosion.	<p>The clearing areas do not occur within an area where there has been intensive clearing or disturbance. Up to 99.9% of the pre-European native vegetation within the Gascoyne IBRA region remains (DPIRD, 2018).</p> <p>There are no registered contaminated sites or dieback within the clearing areas. The proposed clearing is limited to vegetation rolling and minor mechanical clearing which is unlikely to disturb any acid sulphate soil which may be present.</p>

Environmental Value	Consideration used to determine if a permit is required	Proposed Clearing
Heritage-related values and native title matters	Proximity to heritage-related values, including sites of Aboriginal significance, and native title matters.	A search of the Aboriginal Cultural Heritage Inquiry System was conducted in March 2025. No registered, lodged or historic sites were identified within the clearing areas. APA also completed a Cultural Sensitivity Assessment with the Nyiyaparli People and determined that the area was culturally safe to access.

***Criterion 3: The state of scientific knowledge of native vegetation within the region is adequate***

APA commissioned flora and fauna surveys in 2024 over the entire 18,000 ha Section 91 Licence area, which includes the clearing areas. The survey work was completed as part of a larger renewable energy hub project that will be subject to separate approvals. The reporting for this survey work is still being prepared, however Phoenix has prepared a technical memo which addresses the proposed clearing for the two met mast locations. Therefore, APA has extensive and current knowledge of the native vegetation within the clearing areas and the surrounds.

Should this referral be determined to not require a permit, APA will undertake clearing within weeks of receiving a decision and therefore the recent survey results will remain relevant.

***Criterion 4: Conditions will not be required to manage environmental impacts***

APA has considered the mitigation hierarchy for the proposed clearing to ensure impacts to environmental values are minimised as much as possible. Clearing is limited to 2.4 ha for the installation of two met masts. The application of the mitigation hierarchy has been summarised below.

*Avoid*

Access to the proposed clearing areas will be by existing pastoral tracks to avoid clearing of native vegetation for additional access tracks.

The following environmental values have also been avoided in the design of the clearing areas:

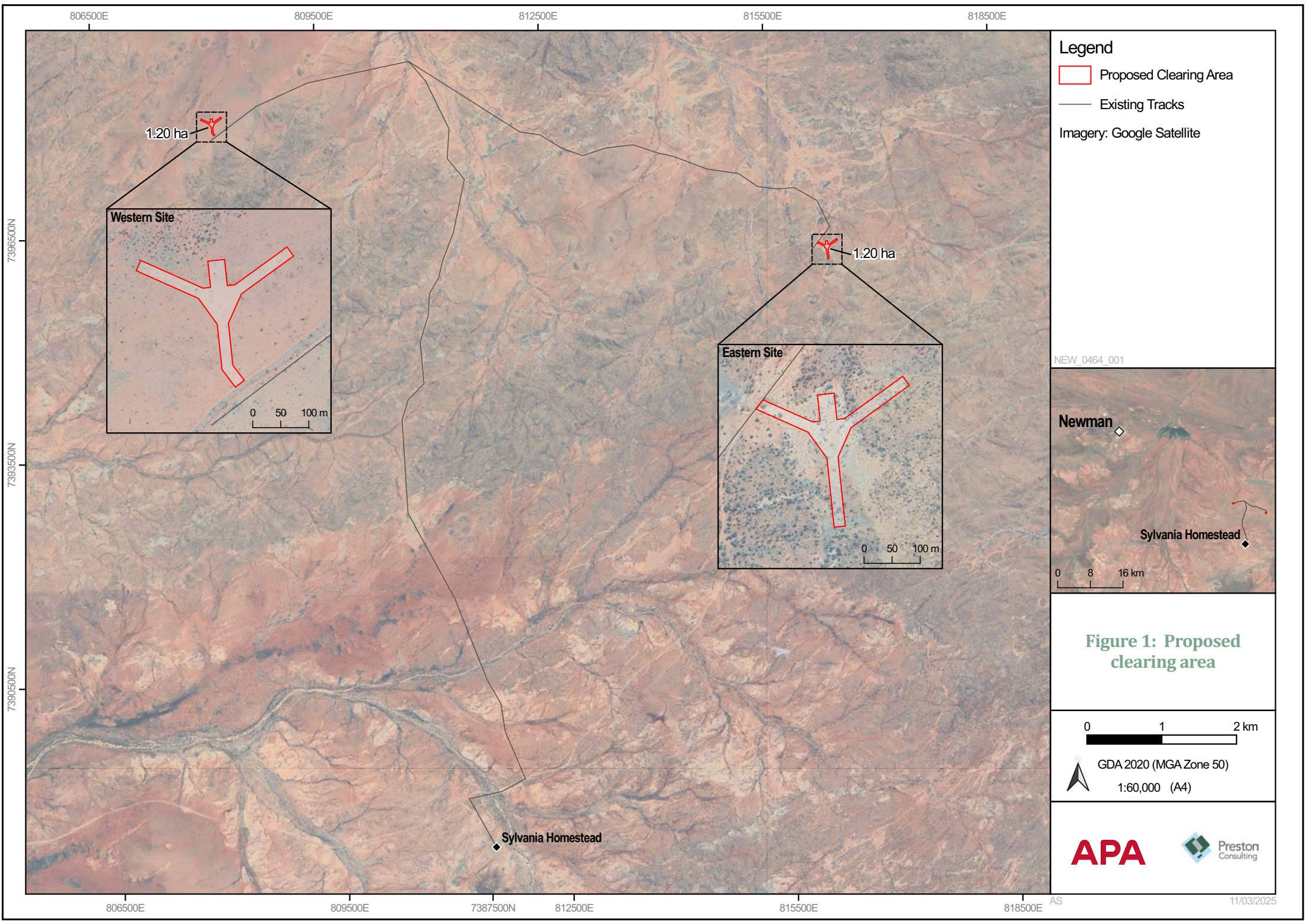
- Threatened Ecological Communities and Priority Ecological Communities;
- Significant flora and fauna;
- Potential significant fauna habitat;
- Heritage values; and
- Watercourses and public drinking water source areas.

*Minimise*

The following steps have been taken to minimise impacts:

- Met mast locations have been designed close to existing tracks used for access to further minimise the amount of clearing between the existing tracks and the met mast locations;
- APA will only clear what is actually required for the installation of met masts; and
- Wherever possible, clearing will be undertaken by vegetation rolling to reduce damage to native vegetation.





**Legend**

Proposed Clearing Area

Existing Tracks

Imagery: Google Satellite

NEW\_0464\_001

**Newman**

**Sylvania Homestead**

0 8 16 km

**Figure 1: Proposed clearing area**

0 1 2 km

GDA 2020 (MGA Zone 50)

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