



## Appendix A

### Clearing permit offset proposal form

*Environmental Protection Act 1986*

| 1. Occupier's details   |   |
|---|---|
| Date: Clearing permit application number:   | CPS 11017/1   |
| Applicant:  |   |
| Phone numbers:  |   |
| Email:  |   |
| Contact person or environmental specialist:                                       |   |
| Name:   |   |
| Company:  |   |
| Phone numbers:  |   |
| Email:  |   |
| Environmental specialist's qualifications or equivalent, and relevant experience: | Bachelor of Science (Environmental), Post-graduate Diploma in Environmental Impact Assessment, 25 years environmental consulting experience |
| Purpose of clearing:  | Progression of the Peel Health Campus Expansion Project   |
| Land details of the clearing application area:                                    | Lot 3001 Lakes Road, Greenfields (on Deposited Plan 43727) (Crown Reserve R 40505)  |
| Total area of the proposed clearing (hectares):                                   | 2.84 ha   |

| 2. Proposed on site mitigation (if applicable)   |   |
|--|---|
| Area (ha) / number of trees to be planted:   | A total offset area of 6.78 ha, comprising of:<br>- 6.58 ha area of existing native vegetation will be managed to achieve an avoided loss outcome.<br>- 0.20 ha comprises previously cleared land and will be addressed through rehabilitation to restore native vegetation values. |
| Other on ground management actions proposed:   | Rehabilitation, weed control, access control, monitoring  |
| Future tenure and/or zoning:<br>(e.g. a conservation covenant will be placed on the certificate of title after sand mining and rehabilitation is undertaken) | Reserve for Conservation Purposes   |

|   |                              |
|---|------------------------------|
| Estimated future vegetation condition (Keighery scale):   | Excellent                    |
| Proposed commencement date of rehabilitation and revegetation:  | January 2026                 |
| Proposed completion date of rehabilitation and revegetation:<br>(date by which the benefit for the species/vegetation community impacted has been achieved) | January 3031                 |
| Is a revegetation plan attached?  | Proposed condition of permit |
| Is the spatial data for the location of on site mitigation provided (ESRI shapefile format)?  | Yes                          |
| Estimated cost of mitigation (on site rehabilitation and revegetation):   | \$500,000                    |

### 3: Proposed offset site (off site location)

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|--|--|
| Land details:  |  |
| Area (ha) or number of trees at site prior to offset being undertaken:   |  |
| Type of offset:<br>(rehabilitation and revegetation, on ground management or land acquisition)   |  |
| Current scheme zoning: (region or local scheme)  |  |
| Are there any development approvals?<br>(for example, extractive industry license or <i>Environment Protection and Biodiversity Conservation Act 1999</i> approval)            |  |
| Future tenure and/or zoning:<br>(e.g. proposed to change local council reserve from recreation to conservation purposes)   |  |
| Current vegetation condition (Keighery scale):   |  |
| Future predicted vegetation condition, if rehabilitation and revegetation or other on ground management are being carried out as part of the offset proposal (Keighery scale): |  |
| Proposed commencement date of rehabilitation and revegetation and/or other on ground management:   |  |

|   |  |
|---|--|
| Proposed completion date of rehabilitation and revegetation and/or other on ground management:<br>(date by which the benefit for the species/vegetation community impacted has been achieved) |  |
| Proposed date of land acquisition or method of securing the tenure of the site:   |  |
| Is the environmental survey of the offset site attached?  |  |
| Is a revegetation plan attached (if required)?  |  |
| Is the spatial data for the location of the offset site provided (ESRI shapefile format)?   |  |
| Is the spatial data for the environmental survey of the offset site provided (ESRI shapefile format)<br>(vegetation condition and type, locations of habitat trees)                           |  |
| Estimated cost of the offset:   |  |

#### 4. Information demonstrating that the offset policy principles have been addressed (if you require more space for this section, please attach separate documents)

1.Environmental offsets will only be considered after avoidance and mitigation options have been pursued.

Please explain how the significant impacts of the project (as identified by DER or DMP in the preliminary assessment report provided to the applicant) have been avoided and/or minimised. You should explain how each of the mitigation hierarchy steps (avoid, minimise, rehabilitate) have been applied to address each significant impact (that is, each clearing principle that is at variance), from the original proposed clearing application area through to the current proposed clearing application area. Offsets are only applied to the significant residual impact that remains after these steps have been taken.

See Emerge Associates Amendment Application Supporting Document Dated 18 December 2025. Extract provided below:

During the initial proposal development for the PHC expansion, the Applicant assessed a range of options to accommodate facility requirements across the broader Project Area. Through this process, substantial avoidance measures were demonstrated, which ultimately informed the approval of clearing permit CPS 11017/1. These measures resulted in the avoidance of the following environmental values within the broader Project Area:

- Approximately 7.38 ha of high-quality native foraging habitat for Carnaby's black cockatoo, comprising 6.71 ha of primary native foraging habitat and 0.67 ha of secondary native foraging habitat.
- Approximately 6.72 ha of high-quality native foraging habitat for Baudin's black cockatoo, comprising 0.38 ha of primary native foraging habitat and 6.34 ha of secondary native foraging habitat.
- Approximately 7.32 ha of high-quality native foraging habitat for forest red-tailed black cockatoo, comprising 6.71 ha of primary native foraging habitat and 0.61 ha of secondary native foraging habitat.
- A total of 80 black cockatoo habitat trees, including 79 identified as potential nesting trees and one identified as a suitable nesting tree.
- Approximately 6.08 ha of Banksia woodlands TEC/PEC.
- Approximately 1.94 ha of Tuart woodlands TEC/PEC.

In addition to the avoidance measures addressed within the approved clearing permit (CPS 11017/1) application (Emerge Associates 2025), the PHC Development Layout Plan has undergone further refinement, resulting in the Amended Clearing Area proposed in this application. When compared to the approved clearing permit (CPS 11017/1), the Amended Clearing Area further reduces environmental impacts, adding to the avoidance of the following environmental values:

- A reduction in the extent of Banksia woodland Priority Ecological Community (PEC) clearing by approximately 0.42 ha.
- A reduction in the extent of Carnaby's black cockatoo and forest red-tailed black cockatoo primary native foraging habitat clearing by approximately 0.02 ha, together with a reduction in the overall extent of foraging habitat clearing (including secondary native foraging habitat).

The overall impact avoidance outcome achieved as outlined above was the result of many iterations of the project development design and consideration of the project needs. In regard to the clearing associated with the Amended Clearing Area as presented in the application, it is important to note that:

- Further avoidance and reduction to the overall native vegetation clearing within the Amended Clearing Area has been achieved through redesign of the PHC development layout. The relocation of the proposed PHC building has allowed for additional avoidance to the Banksia woodland TEC by situating the building within an area that has previously been cleared and does not contain Banksia woodland TEC. This redesign has reduced the extent of Banksia woodland TEC/PEC clearing by approximately 0.42 ha and enabled the retention of higher-quality Banksia woodland TEC/PEC mapped in 'very good' condition within the northern and eastern portions of the Project Area. These retained areas will form part of the required offset area and will be protected within a conservation reserve.
  - While all trees within the Amended Clearing Area are currently proposed to be cleared, the Applicant has committed to opportunistically retaining black cockatoo habitat trees where possible along the southern boundary of the Amended Clearing Area. Although this amendment application is assessed on a worst-case scenario, the final development outcome is expected to achieve additional avoidance through the likely retention of black cockatoo habitat trees where possible.
- Given the impact avoidance that was accommodated into the consideration of the above, and the operational needs for the expansion, there is no further opportunity to avoid clearing of native vegetation and still meet the operational needs of the facility.



## 2. Environmental offsets will be cost-effective, as well as relevant and proportionate to the significance of the environmental value being impacted.

You should explain how the proposed offset will address each of the impacts described under the biodiversity related clearing principle(s) that the application is at variance to (as outlined in the DER or DMP preliminary assessment report provided to the applicant). Under each principle at variance, you should provide information on each environmental value that may be removed or decline as a result of the clearing and how the offset will provide equivalent or better replacement for these values (e.g. fencing the site, other habitat provided, etc.)

It is preferable that the design of an offset leads to a net gain in size, density and diversity of native vegetation and an overall improvement in the condition of the natural environment and the specific environmental values requiring offsetting. Please include information on how your offset has given consideration to ecosystem function, rarity, connectivity, vegetation condition, habitat quality and the type of ecological community cleared.

The requirement for 'equivalent or better replacement' is the key to successfully addressing this offset principle. For example, if breeding habitat (trees with hollows) for Carnaby's cockatoo is cleared then it is not appropriate to propose feeding habitat as an offset.

You may also provide information detailing expertise and demonstrated success in rehabilitation of the same vegetation type.

The key SRI as indicated in the Emerge Associates Amendment Application Supporting Document dated 18 December 2025 and the DWER Request for Further Information dated 17 April 2025, include:

- 2.45 ha of high-quality foraging habitat for Carnaby's cockatoo and forest red-tailed black cockatoo (black cockatoos).
- 1.49 ha of the Banksia Woodlands of the Swan Coastal Plain ecological community (Banksia Woodland PEC).

The proposed offset responds to these SRI through the provision of onsite revegetation and vegetation management to improve the quality of black cockatoo foraging habitat and Banksia Woodlands PEC.

In relation to the potential environmental offset outcome required as a result of the proposed SRI values identified by DWER, a portion of the broader Project Area that has been targeted for the avoidance of clearing, and which supports black cockatoo habitat and Banksia woodland TEC/PEC, is proposed as the basis for an on-site environmental offset. The proposed offset area totals 6.78 ha in size and is located immediately to the north and east of the proposed Amended Clearing Area (Figure 11 of the supporting letter).

The majority of the proposed offset area comprises existing native vegetation, which will be retained, protected and managed to deliver an averted loss outcome consistent with the WA Environmental Offsets Policy (Government of Western Australia 2011). A smaller component of the offset area, approximately 0.20 ha in size, comprises land that was previously cleared under the Approved Clearing Permit (CPS 11017/1) during the initial forward works undertaken (Figure 11), and will be addressed through rehabilitation to restore native vegetation values over time.

While the offset site will be managed as a single, contiguous area, the existing native vegetation and the cleared land will be addressed as distinct offset mechanisms, protection and rehabilitation respectively, within the same offset framework in accordance with the WA Environmental Offsets Policy (Government of Western Australia 2011).

The proposed offset area is considered ideal as an environmental offset opportunity as it is under the control of the Southern Metropolitan Health Services (SMHS) (the operator of the Peel Health Campus) and is proximal to the proposed clearing and offers the opportunity to provide a higher level of certainty in relation to its future avoidance and protection (in perpetuity) and also supports the same vegetation values as those being considered relevant to the proposed clearing.

In addition to this, the offset site will be protected in perpetuity through:

1. Excise the proposed offset area from the current Peel Health Campus lot into a separate lot.
2. Create a new Reserve over the proposed conservation area, for Conservation purposes, with a Management Order to the Department of Health.

The residual offset requirement to ensure an appropriate offset response will be addressed through a cash provision to acquire land that supports black cockatoo foraging habitat and Banksia Woodland PEC.

Therefore the proposed offset will be cost-effective and well as relevant and proportionate to the significance of the environmental values being impacted.

3. Environmental offsets will be based on sound environmental information and knowledge.

Describe how the environmental specialist has been involved in the design of the offset proposal and how and when an environmental specialist will be involved in the implementation and monitoring of the offset.

An environmental specialist means a person who is engaged by the permit holder for the purpose of providing environmental advice, who holds a tertiary qualification in environmental science or equivalent, and has experience relevant to the type of environmental advice that is required under the clearing permit and offset proposal.

You must describe the methodology for determining the components of an offset proposal. For example, this may include the identification of a suitable site based on landform, soil, proximity, species composition and relationship to the environmental values impacted.

If your offset includes rehabilitation and revegetation, please provide evidence of how the completion criteria were determined as appropriate and evidence of your ability to successfully meet those criteria. (Note. You may refer to the revegetation plan rather than repeat information)

Emerge Associates has been involved in progressing the offset proposal and the site conditions (including the offset site) have been the subject of details baseline ecological survey to understand both the SRI and the offset opportunities and approach.

The DWER offset metric has been used to quantify the overall environmental offset requirements.

The rehabilitation and revegetation completion criteria will be to ensure that the offset vegetation reaches 'Excellent' condition.

4. Environmental offsets will be applied within a framework of adaptive management.

Adaptive management involves defining the problem, establishing goals, implementing the action (including monitoring plans), evaluating the results and adapting in response to new information. For environmental offsets, this principle primarily relates to rehabilitation and revegetation or on ground management of native vegetation.

An adaptive management approach requires that contingency measures are in place to respond if monitoring determines an offset is not on track to meet completion criteria.

You should briefly describe the following (detailed information should be provided in the revegetation plan):

- Objectives
- Brief description of how the offset will be implemented (including timeframes)
- Monitoring techniques and timeframes
- Contingencies (e.g. monitoring results may trigger infill planting to ensure rehabilitation is successful).

A Revegetation Management Plan will be prepared for the onsite revegetation and vegetation management to ensure that the offset outcomes are planned for and delivered.

This will include:

- Objectives
- Brief description of how the offset will be implemented (including timeframes)
- Monitoring techniques and timeframes
- Contingencies (e.g. monitoring results may trigger infill planting to ensure rehabilitation is successful).

5. Environmental offsets will be focused on longer term strategic outcomes.

Before an offset can be approved, you must ensure that any other licences or approvals that are required have been obtained, and provide evidence of these. Examples include a letter of support from the landowner of an offset acquisition, a copy of the applicant's licence to collect seed or a licence to relocate fauna.

Explain what management processes will be implemented to ensure that there is an environmental benefit achieved over the longer term. You must be able to demonstrate that the tenure of the offset is secure and provides a long term conservation benefit for the environmental value/s impacted by the clearing. For example, an offset may be based on the types of actions proposed in a species recovery plan but additional to work already undertaken by the Department of Parks and Wildlife or land manager and not part of normal responsibilities.

The proposed offset site is under the management authority of the Department of Health.

The offset site will be protected in perpetuity through:

1. Excise the proposed offset area from the current Peel Health Campus lot into a separate lot.
2. Create a new Reserve over the proposed conservation area, for Conservation purposes, with a Management Order to the Department of Health.

The proposed works to improve the condition of the vegetation within the proposed offset site will be additional to any site management obligations already bestowed upon the Department of Health.

The proposed works to improve the condition of the vegetation within the proposed offset site will be directly related to the environmental values being impacted and that fall within a Peel Regionally Significant Area, a broader strategically important bushland area.

## 5. Ongoing commitments and consultation

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| <b>Monitoring commitment (including costs):</b><br>(Note: you may refer to the revegetation plan here, if applicable, rather than repeat information.) | Five (5) years (costs included in provision above) |
| <b>Management commitment (including costs):</b><br>(Note: you may refer to the revegetation plan here, if applicable, rather than repeat information.) |  |
| <b>Agencies or other organisations consulted and submissions received:</b>   | N/A  |

## 6. Other

|   |   |
|---|---|
| Please note that contaminated site/s classified under the <i>Contaminated Sites Act 2003</i> (past refuse disposal facilities, maintenance yards) are not considered to be suitable offset sites  | <input checked="" type="checkbox"/> Noted |
| You must ensure all laws are complied with (e.g. <i>Native Title Act 1993</i> ) and that necessary approvals are obtained (e.g. from landowner/s on which the offset will occur in the event that the subject land is not vested with the applicant) prior to submission. | <input checked="" type="checkbox"/> Noted |
| The agreed offset proposal document and revegetation plan may be published on the WA Environmental Offsets Register.  | <input checked="" type="checkbox"/> Noted |