

Document Reference: EP24-094(06)—016 KNF

13 January 2026

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 Emerge Associates

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

*Delivered by email to: [info@dwer.wa.gov.au](mailto:info@dwer.wa.gov.au)*

Dear Sir/Madam,

## **APPLICATION TO AMEND CLEARING (AREA) PERMIT (CPS 11017/1) FOR 110 (LOT 3001) LAKES ROAD, GREENFIELD ON DEPOSITED PLAN 43727**

This letter correspondence has been prepared in support of the lodgement of an application to amend native vegetation clearing permit CPS 11017/1 pursuant to Section 51M of the *Environmental Protection Act 1986* (EP Act). The application to amend the clearing permit is lodged by the Department of Housing and Works (DoHW or ‘the permit holder’) and is associated with the proposed clearing of native vegetation associated with the Peel Health Campus (PHC) Expansion project.

Regarding the clearing permit amendment application and the summary provided in this supporting letter, please note the following key terms as they relate to the clearing permit amendment application:

- **Project Area** – this encompasses the full extent of 110 (Lot 3001) Lakes Road, Greenfield (see **Figure 1**). The Project Area comprises the existing Approved Clearing Permit Area, the Amended Clearing Area, the Development Envelope and the Avoidance Area.
- **Development Envelope**: the boundary within which construction and development activities are proposed to occur which is approximately 7.66 ha (see **Figure 1**).
- **Avoidance Area**: refers to all areas outside of the Development Envelope that support native vegetation and associated values that have been avoided through proposal design process (see **Figure 1**).
- **Approved Clearing Permit Area**: this refers to the area of native vegetation that is subject to the existing Approved Clearing Permit (CPS 11017/1). The Approved Clearing Permit authorises the clearing of 2.82 ha of native vegetation within the Approved Clearing Permit Boundary (see **Figure 1**).
- **Amended Clearing Area**: this refers to the area of native vegetation that is proposed to be cleared within the Development Envelope and is the subject of this clearing permit amendment application. A total of 2.84 ha of native vegetation is proposed to be cleared as part of the Amended Clearing Area to enable the construction of buildings and associated infrastructure for the PHC Expansion project. This includes vegetation cleared to date under CPS 11017/1 (see **Figure 1** to **Figure 11**).

This letter provides supporting information to be read in conjunction with the Clearing Permit Amendment Application Form and the following attachments:

- **Attachment A – Clearing Permit Amendment Application Form**
- **Attachment B – Peel Health Campus Redevelopment Site Plan**

- **Attachment C – Detailed Flora and Vegetation Assessment Peel Health Campus, Greenfields** (Emerge Associates 2024b).
- **Attachment D – Basic Fauna and Targeted Black Cockatoo Assessment - Peel Health Campus, Greenfields** (Emerge Associates 2024a).
- **Attachment E – Peel Health Campus Historic Aerial Imagery** (Landgate 2024).
- **Attachment F – Appendix A Clearing Permit Offset Proposal**
- **Attachment G – Preliminary Offset Calculation Banksia Woodland Lot 3001**
- **Attachment H – Preliminary Offset Calculation Black cockatoo Lot 3001**
- **Attachment I – Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) Referral Decision.**
- 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) was engaged by the DoHW to assist with the planning for the PHC Expansion Project, which initially involved undertaking a range of baseline ecological surveys and assessments to inform and then guide the planning of the PHC Expansion and to take into consideration the environmental conditions, values and required approvals.

A clearing permit application was lodged with the Department of Water and Environmental Regulation (DWER) on 26 March 2025 for the proposed clearing of native vegetation within a portion of 110 (Lot 3001) Lakes Road, Greenfield (on Deposited Plan 43727) (Crown Reserve R 40505). A clearing permit (CPS 11017/1) was granted on 6 August 2025 and authorises the permit holder to clear no more than 2.82 ha of native vegetation within the approved clearing permit area, as shown in Figure 1.

Since the clearing permit was issued in August 2025, revisions to the PHC design and development layout plan have been undertaken, resulting in a revised Development Layout Plan which has been provided as **Attachment B**. The updated Development Layout Plan necessitates additional clearing of native vegetation outside of the currently approved clearing permit area, but also a reduction of clearing within the previously issued clearing permit area extent. The Amended Clearing Area that is the subject of the amendment application is illustrated in Figure 1.

Clearing associated with forward works for the PHC expansion has commenced within the Development Envelope, resulting in the clearing of approximately 1.15 ha of native vegetation within the approved clearing permit boundary, as shown in Figure 2. Accordingly, the previously cleared areas have been included within this amendment application, along with the remaining native vegetation within the Development Envelope forming the basis of the environmental values assessment for the Amended Clearing Area.

A summary of the characteristics and values of the native vegetation to be cleared within the Amended Clearing Area, including those areas of native vegetation previously cleared within the approved clearing permit boundary, is provided below in **Table 1**.

*Table 1: Amended Clearing Area native vegetation clearing summary and values*

Vegetation Value	Amended Clearing Area	
Native Vegetation	Vegetation Units	Vegetation Condition
	Ap: 0.03 ha BaEm: 1.89 ha Cc: 0.31 ha Eg: 0.01 ha EgBa: 0.16 ha Mixed: 0.27 ha	<b>Completely Degraded:</b> 0.17 ha <b>Degraded:</b> 1.19 ha <b>Good:</b> 0.85 ha <b>Very Good:</b> 0.63 ha

Table 1: Amended Clearing Area native vegetation clearing summary and values (continued)

Vegetation Value	Amended Clearing Area	
(Continued as above)	Vegetation Units	Vegetation Condition
	<b>Non-native:</b> 0.17 ha  <b>Total native vegetation</b> (pursuant to the EP Act) to be cleared: 2.84 ha	
ESA (yes/no)	No	
TECs and PECs	<b>Banksia Woodland TEC:</b> 1.49 ha <b>Tuart woodland TEC:</b> 0.01 ha	
Black cockatoo foraging habitat (ha)	<b>CBC:</b> 2.45 ha of primary native foraging habitat <b>BBC:</b> 0.31 ha of primary native foraging habitat <b>FRTBC:</b> 2.45 ha of primary native foraging habitat	
Black cockatoo potential breeding trees (number)	Evidence of use: 0 Suitable hollows: 0 No Hollows: 37	

In summary, the Amended Clearing Area will require the clearing of 2.84 ha of native vegetation. As a result of this proposed clearing, the following vegetation values would be impacted:

- 1.49 ha of 'Banksia Woodlands of the Swan Coastal Plain' Threatened Ecological Community (TEC)/Priority Ecological Community (PEC).
- 0.01 ha of 'Tuart (*Eucalyptus gomphocephala*) woodlands of the Swan Coastal Plain' Threatened Ecological Community (TEC)/Priority Ecological Community (PEC).
- 2.45 ha of primary native foraging habitat for Carnaby's black cockatoo.
- 0.31 ha of primary native foraging habitat for Baudin's black cockatoo.
- 2.45 ha of primary native foraging habitat for forest red-tailed black cockatoo.
- 37 potential breeding trees for black cockatoo, none with suitable hollows that could be used for breeding.

In comparison to the Approved Clearing Permit (CPS 11017/1), the proposed amendment would result in the following differences in terms of impacts to key vegetation values:

- Reduce the extent of Banksia woodland PEC clearing by 0.42 ha
- Reduce the extent of Carnaby's black cockatoo and Forest red-tailed black cockatoo primary native foraging habitat by 0.02 ha, and reduce extent of foraging habitat clearing overall (including secondary native)
- Increase the extent of native vegetation clearing by 0.02 ha
- Increase the extent of Baudin's black cockatoo foraging habitat by 0.31 ha
- Increase the number of black cockatoo potential breeding trees to be cleared by six (6).

## 2 INTRODUCTION

### 2.1 Background

In 2020, the McGowan Labor Government announced a \$152 million redevelopment for the major expansion and redevelopment of the existing PHC facilities. Stage 1 works were undertaken and completed earlier this year (2025), with Stage 2 'enabling' works commenced in late 2025 and completion was originally expected by September 2027.

The project is a high priority State Government project, and proposes the expansion of healthcare facilities including beds, operating theatre, emergency centre, car parks and connecting roads, which will be directly connected to and integrated with the existing PHC facilities.

The Project Area is currently reserved for ‘Public purposes – Hospital’ under the Metropolitan Region Scheme (MRS), and ‘Public purposes - Hospital’ under the City of Mandurah Local Planning Scheme (LPS) No. 12 and is situated within a ‘Public purposes’ designation identified by the WA State Government in the South Metropolitan Peel Sub-Regional Planning framework (WAPC and DPLH 2018).

On 28 March 2025 the DoHW lodged an application for a new permit to clear native vegetation within a portion of 110 (Lot 3001) Lakes Road, Greenfields associated with the progression of the PHC Expansion Project. The application was for the clearing of 2.82 ha of native vegetation, and was provided by a supporting assessment in letter correspondence from Emerge (Emerge Associates 2025). On the 6 August 2025 the application was assessed and clearing permit CPS 11017/1 was granted under section 51E(5) of the *Environmental Protection Act 1986* (EP Act).

Since the issue of clearing permit CPS 11017/1, revisions to the PHC design and development layout have been undertaken, resulting in a revised Development Layout Plan, as provided in **Attachment B**. The updated layout plan would necessitate additional clearing of native vegetation outside of the currently approved clearing permit area boundary, while also avoiding the need to clear two areas of native vegetation located to the north and east of the Project Area that are included within the Approved Clearing Permit. The Amended Clearing Area does not propose a material increase in the overall clearing extent, but rather a modification to the spatial area of the authorised clearing area.

Forward works associated with the installation of services commenced within the Development Envelope, resulting in the clearing under CPS 11017/1 of approximately 1.15 ha of native vegetation within the Approved Clearing Permit Boundary, as illustrated in **Figure 2**. Accordingly, this cleared vegetation has been included in the environmental values considered as part of this clearing permit amendment application.

The proposed amended clearing extent will be undertaken within one land parcel, 110 Lakes Road, Greenfield, WA, 6210 (Lot 3001 on Deposited Plan 43727). The site is Crown Reserve 40505, for the purpose of ‘Hospital and allied purposes’. A Management Order for the Crown Reserve is held by the Health Ministerial Body, with the Department of Health as the Responsible Agency.

## 2.2 Supporting documentation

A range of investigations have been undertaken within the broader Project Area to support the relevant approval processes required for the proposed expansion of the PHC facilities. This includes the following:

- *Basic Fauna and Targeted Black Cockatoo Assessment - Peel Health Campus, Greenfields* (Emerge Associates 2024a) (see **Appendix C**).
- *Detailed Flora and Vegetation Assessment Peel Health Campus, Greenfields* (Emerge Associates 2024b) (see **Appendix D**).

## 2.3 Amended Clearing Area boundary

This clearing permit amendment application proposes a modification to the boundary of the area authorised to be cleared (the “Amended Clearing Area”) to align with the most recently revised and updated PHC Development Layout Plan. The Amended Clearing Area will incorporate portions of existing clearing permit CPS 11017/1 as well as an additional area within the southern portion of the Project Area that currently falls outside of the Approved Clearing Permit Boundary. Conversely, two areas of native vegetation currently included within the Approved Clearing Permit Area, located to the north and east, are no longer required and therefore excluded from the required clearing area. The location and extent of the clearing area subject to this amendment application is shown in **Figure 1** and is referred to as the ‘Amended Clearing Area’.

Overall, the Amended Clearing Area does not propose a material increase in the overall clearing extent, but rather a modification to the spatial area of the authorised clearing area.

#### 2.4 Historical land uses and clearing

The Project Area has been subject to historical disturbance, clearing and development works for the establishment of the existing PHC facilities. This includes cleared areas associated with car parks, infrastructure and associated built-up areas. Conversely, areas within the Project Area located to the north and east support intact native vegetation which has been subject to less historic disturbance.

Based on a review of historical aerial imagery, more than half of the Project Area was cleared by 2000 (Landgate 2024), with the eastern balance of the Project Area comprising of remnant native vegetation that has not been cleared (see **Attachment E**).

Forward works commenced within the Approved Clearing Permit Area for CPS 11017/1, resulting in the clearing of approximately 1.15 ha of native vegetation, as shown in **Figure 2**. These areas of cleared vegetation have been included within the clearing permit amendment, with native vegetation values assessed based on the vegetation existing prior to that clearing being undertaken and discussed in the following sections.

### 3 SUMMARY OF ENVIRONMENTAL CONDITIONS

#### 3.1 Flora and vegetation assessment

As part of the application process for the currently approved clearing permit (CPS 11017/1), Emerge undertook a flora and vegetation assessment across the entirety of the Project Area. The assessment was completed to a 'detailed' survey standard in accordance with the EPA's *Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment* (EPA 2016). Emerge completed the detailed flora and vegetation assessment with surveys conducted during spring 2021, 2022, 2023 and 2024, during which the composition and condition of vegetation was recorded. The assessment report is provided as **Attachment C**.

##### 3.1.1 Regional vegetation complexes

Heddle et al. (1980) mapping shows the Project Area as comprising the 'Yoongarillup complex', which is described as woodland to tall woodland of *Eucalyptus gomphocephala* with *Agonis flexuosa* in the second storey, and occasionally open forest of *Eucalyptus gomphocephala* - *Eucalyptus marginata* -*Corymbia calophylla*.

The Yoongarillup complex was determined to have 35.8% of its pre-European extent remaining on the Swan Coastal Plain in 2018, with 14.1% protected for conservation purposes (Government of Western Australia 2019).

##### 3.1.2 Threatened or Priority Flora

The Protected Matters Search Tool (DCCEEW 2024) and DBCA's threatened and priority flora databases (reference no. 36-1121FL) identified 15 threatened and 46 priority flora occurring or potentially occurring within a 15 km radius of the Project Area (refer to **Attachment C**). Based on a review of distribution and habitat preferences, *Caladenia huegelii* (CR) was considered to have a high likelihood of occurrence within the Project Area, including the Amended Clearing Area, while four (4) were considered to have a moderate likelihood of occurrence, namely *Acacia benthamii* (P2), *Lasiopetalum membranaceum* (P3), *Caladenia speciosa* (P4) and *Jacksonia sericea* (P4).

No occurrences of threatened or priority flora species were recorded within the Project Area during the surveys. There was no confirmed suitable habitat for any threatened or priority flora species recorded within the Project Area during the surveys.

All the significant species identified in the desktop assessment are not considered likely to occur in the Project Area due to lack of suitable habitat and because they were not recorded during the field survey, including *C. huegelii*. This species' habitat is well-drained, deep sandy soils in lush undergrowth in a variety of moisture levels, and flowers in September to early November. The habitat in the Project Area does not represent *C. huegelii* habitat. Specifically targeted surveys during spring did not identify *C. huegelii* within the Project Area, and no further survey is required to confirm the absence of *C. huegelii* within the Project Area.

### 3.1.3 Plant communities and condition

The detailed flora and vegetation assessment (Attachment C) identified seven (7) vegetation units within the Project Area, as shown in Figure 3. The vegetation condition across the Project Area ranged from 'Very Good' to 'Completely Degraded' condition using methods from Keighery (1994) and as shown on Figure 4. The vegetation units and condition recorded within the proposed clearing areas, including the previously cleared areas, which collectively comprise the total Amended Clearing Area, are summarised in Table 2 below.

Table 2: Vegetation values within the Amended Clearing Area

Vegetation units and description	Vegetation condition (Keighery 1994)	Amended Clearing Area (ha)
<b>Ap</b> - Shrubland of <i>Acacia pulchella</i> var. <i>glaberrima</i>	'Degraded'	0.03 ha
<b>BaEm</b> - Woodland <i>Banksia attenuata</i> and <i>Eucalyptus marginata</i> with scattered <i>Banksia grandis</i> over shrubland <i>Gompholobium aristatum</i> , <i>Hibbertia hypericoides</i> and <i>Macrozamia riedlei</i> over mixed native sedge/herbland over grassland * <i>Ehrharta calycina</i>	'Good' to 'Degraded'	1.89 ha
<b>Cc</b> – Forest <i>Corymbia calophylla</i> over scattered shrub <i>Macrozamia riedlei</i> and <i>Jacksonia sternbergiana</i> over grassland * <i>Ehrharta calycina</i>	'Degraded'	0.31 ha
<b>Eg</b> – Forest <i>Eucalyptus gomphocephala</i> and scattered planted trees over planted gardens, bare ground and hard stand	'Degraded'	0.01 ha
<b>EgBa</b> – Woodland <i>Eucalyptus gomphocephala</i> and <i>Banksia attenuata</i> over shrubland <i>Gompholobium aristatum</i> and <i>Jacksonia sternbergiana</i> over mixed native sedge/herbland over grassland * <i>Ehrharta calycina</i>	'Degraded'	0.16 ha
<b>Mixed</b> – Open woodland native species such as <i>Eucalyptus gomphocephala</i> , <i>Eucalyptus marginata</i> , <i>Banksia attenuata</i> and <i>Jacksonia furcellata</i> with non-native species such as * <i>Eucalyptus camaldulensis</i> , * <i>Ehrharta calycina</i> and * <i>Eragrostis curvula</i> in modified drainage landform	'Degraded'	0.27 ha
<b>Non-native</b> – Heavily disturbed areas containing predominantly non-native vegetation with scattered native plants	'Completely Degraded'	0.17 ha

The native vegetation to be cleared (and as defined by the Amended Clearing Area) is based on the presence of native vegetation canopy cover and includes canopy cover that extends over the existing cleared and bare ground areas.

Avoidance of clearing and native vegetation retention within the broader Project Area is discussed in Section 5.

### 3.1.4 Threatened Ecological Communities and Priority Ecological Communities

Within the Amended Clearing Area, a 1.89 ha portion of the community BaEm and 0.16 ha of the community EgBa was considered representative of EPBC Act listed *Banksia Woodlands of the Swan Coastal Plain* (Banksia Woodlands TEC). Additionally, 0.01 ha of the *Tuart (Eucalyptus gomphocephala) woodlands of the Swan Coastal Plain* (Tuart woodlands TEC) was identified within to occur within the Amended Clearing Area associated with plant community EgBa and Eg, as shown in Figure 5.

The DoEE (2019) conservation advice for Tuart woodlands TEC states that the boundary of a patch of the Tuart woodlands TEC is determined by applying a 30 m buffer to the canopy of each tuart tree that has a Diameter at Breast Height (DBH) greater than 150mm. Small areas without understory vegetation, such as bare ground or hardscape, are included in the determination of a patch if they do not significantly alter the overall function of the ecological community, but buildings and gardens do not represent the Tuart woodlands TEC or contribute to determination of patch size and condition (DoEE 2019).

Based on this, the majority of the 30 m buffer applied to the tuart trees within the Eg vegetation unit within the Project Area would not represent the Tuart woodlands TEC on its own as it wouldn't meet condition thresholds applicable to smaller patch sizes. Inspection of adjacent areas during the flora and vegetation survey indicated that additional Tuart trees occur on the opposite side of Lakes Road within various private landholdings, outside of the Project Area. When buffered in accordance with the conservation advice these areas connect with the patch of Tuarts comprising the Eg vegetation units within the Project Area to form a larger patch that extends outside of the Project Area. The extent of this Tuart woodlands TEC patch within the Project Area consists largely of isolated tuart trees that are located above bare ground/ garden beds, and are atypical of Tuart understory, and as such does not represent high value Tuart woodlands TEC but would be considered as forming part of the Tuart woodlands TEC given the proximity of the adjacent and wider occurring Tuart woodlands TEC patch.

The Banksia woodlands TEC is also representative of the State listed Priority 3 Priority Ecological Community (PEC). The description, area and condition thresholds that apply to the EPBC-listed TEC of the same name, also apply to this PEC, but is not identified as a TEC pursuant to the Western Australian *Biodiversity Conservation Act 2016* (BC Act).

The Tuart woodlands TEC is also representative of the State listed Priority 3 Priority Ecological Community (PEC). The description, area and condition thresholds that apply to the EPBC-listed TEC of the same name, also apply to this PEC, but is not identified as a TEC pursuant to the BC Act.

### 3.2 Fauna

As part of the application process for the currently approved clearing permit (CPS 11017/1), Emerge completed a Basic Fauna Survey and Targeted Black Cockatoo Assessment field survey across the broader Project Area on 6 September 2024, to the standards of the *Technical Guidance - Terrestrial vertebrate fauna surveys for environmental impact assessment* (EPA 2020) and the EPBC Act Black cockatoo referral guidelines (DAWE 2022). The fauna assessment report is attached as **Attachment D**.

The 24 native fauna species recorded within the broader Project Area are all generally common and widespread across the Swan Coastal Plain.

#### 3.2.1 Fauna habitat

The Banksia woodland habitat (see **Figure 6**), in the eastern portion of the Project Area provides the greatest value to fauna as it provides contiguous cover of native trees and shrubs. The habitat is relatively limited in extent for larger ranging fauna species and largely confined with little connectivity with other areas of remnant vegetation. Disturbance from regular human activity such as walking tracks has also reduced the value of this habitat.

The remaining habitats are likely to be predominantly used by common and widespread native and non-native fauna with non-specific habitat requirements, which enable them to persist in highly modified environments.

#### 3.2.2 Likelihood of occurrence

Five State listed species were considered to have a moderate likelihood of occurrence within the Project Area including *Apus pacificus* (MI), *Falco peregrinus* (OS), *Synemon gratiosa* (P4), *Lerista lineata* (P3) and *Neelaps Calonotos* (P3). Despite not being recorded during the field survey, four species were considered to have a high likelihood of occurrence within the Project Area including *Zanda latirostris* (Carnaby's black

cockatoo), *Zanda baudinii* (Baudin's black cockatoo), *Calyptorhynchus banksii naso* (forest red-tailed black cockatoo) and *Isoodon fusciventer* (P4).

Carnaby's black cockatoo, Baudin's black cockatoo and Forest red-tailed black cockatoo have a high likelihood of occurring within the Project Area. These species are discussed further in **Section 3.6.3**.

Of the remaining species with moderate and high likelihoods of occurrence, the Project Area provides limited habitat.

While quenda (P4) wasn't recorded during the survey, it is likely they utilise the banksia woodland habitat due to its dense ground cover. The Project Area isn't large enough to support multiple individuals, but nearby adjacent residential gardens may provide a connection to the quenda record along the Serpentine River approximately 650 m away.

Perth slider (P3) and black-striped snake (P3) are both found within banksia woodlands on the Swan Coastal Plain and so the banksia woodland habitat would be suitable for these species. However, due to the relatively small extent of banksia woodland within the Project Area and its isolation, the likelihood of both species being present is moderate.

Pacific swift (MI) and peregrine falcon (OS) are highly mobile species that may opportunistically fly over or forage within the Project Area for short periods of time as part of a much larger home range. Neither of these species would breed within the Project Area. Any occurrence of pacific swift or peregrine falcon in the Project Area would likely be in the air space and largely independent from terrestrial habitat.

### 3.2.3 Black Cockatoos

#### 3.2.3.1 Foraging Habitat

The Project Area contains native foraging habitat for all species of black cockatoo. The majority of the foraging habitat is associated with the Banksia woodland vegetation. This is considered primary native foraging habitat for Carnaby's black cockatoo due to the banksia species and Jarrah. Jarrah is also considered a primary species for the Forest red-tailed black cockatoo. This habitat is only categorised as secondary for Baudin's black cockatoo as these plants are only considered supplementary foraging sources for this black cockatoo species.

Marri trees within the southern portion of the Project Area, including the Amended Clearing Area, provides a primary native foraging source for all three species of black cockatoo, while the tuart trees located along Lakes Road provides secondary foraging habitat for both Carnaby's and Forest red-tailed black cockatoos. *Agonis flexuosa* (peppermint tree) and *Jacksonia furcellata* also feature within the Project Area which provide secondary foraging habitat for Carnaby's, as well as *Allocasuarina fraseriana* (sheoak), which provides a secondary foraging habitat for all three species of black cockatoo.

Including the area of cleared native vegetation within the approved clearing permit boundary, the following black cockatoo foraging habitat values have been recorded within the broader Project Area:

- **Carnaby's black cockatoo:** A total of approximately 10.18 ha of foraging habitat occurs within the Project Area, comprising 9.20 ha of primary native foraging habitat and 0.98 ha of secondary native foraging habitat. Of this, approximately 2.74ha (2.45 ha of primary native and 0.29 ha of secondary native foraging habitat) occurs within the Amended Clearing Area and is proposed to be cleared, as shown in **Figure 7**.
- **Baudin's black cockatoo:** Approximately 9.49 ha of foraging habitat remains within the Project Area, comprising 0.38 ha of primary native foraging habitat and 9.11 ha of secondary native foraging habitat. Of this total, approximately 2.73 ha (0.31 ha of primary native and 2.42 ha of secondary native foraging habitat) falls within the Amended Clearing Area and is proposed to be cleared, as shown in **Figure 8**.
- **Forest red-tailed black cockatoo:** Approximately 10.18 ha of foraging habitat occurs within the Project Area, comprising 9.20 ha of primary native foraging habitat and 0.91 ha of secondary

native foraging habitat. Of this, approximately 2.74 ha (2.45 ha of primary native and 0.29 ha of secondary native foraging habitat) occurs within the Amended Clearing Area and is proposed to be cleared, as shown in **Figure 9**.

### 3.2.3.2 Breeding Habitat

Carnaby's and Baudin's black cockatoos are not expected to breed within the Project Area, as it lies outside their modelled breeding ranges. In contrast, Forest red-tailed black cockatoos do not have defined breeding area, and therefore, the Project Area has the potential to support breeding by this species.

The Project Area contains 114 trees of the appropriate species that are large enough to be considered potential breeding trees but wouldn't currently provide nesting habitat due to the lack of suitable hollows. These habitat trees have the potential to form suitable hollows in the future, however, it could take decades for hollows to form that are large enough to be suitable for use by black cockatoos for breeding.

One suitable nesting tree was recorded within the Project Area containing a hollow potentially suitable for use by black cockatoos for nesting (see **Figure 10**), but this is not currently being used for breeding by black cockatoo and is not proposed to be cleared.

A total of thirty seven (37) potential black cockatoo nesting trees occur within the Amended Clearing Area and would be removed during the clearing as shown in **Figure 10**. These black habitat trees do not currently support suitable nesting hollows for black cockatoos and therefore could not currently support black cockatoo breeding activity within the Amended Clearing Area.

### 3.2.3.3 Roosting Habitat

There are no known black cockatoo roosting sites within the Project Area, and the nearest known black cockatoo roosting site is located approximately 0.83 km southwest from the Project Area. No secondary evidence of roosting such as branch clippings, droppings or feathers were observed within the Project Area.

Therefore, there is no reason to suspect that roosting by black cockatoos has recently occurred within the Project Area. Nevertheless, the Project Area contains many tall trees and groups of tall trees that have the potential to provide roosting habitat for black cockatoos.

## 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 developing the Peel Health Campus Expansion project and the resultant proposed Amended Clearing Area, in order to ensure the environmental impacts associated with proposed clearing were minimised.

### 4.1 Avoidance

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 issue of clearing permit CPS 11017/1. These measures resulted in the avoidance of the following native vegetation 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 as part of this application. When compared to the Approved Clearing Permit Area (CPS 11017/1), the Amended Clearing Area further reduces 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.

## 4.2 Mitigation

Clearing activities will be managed in accordance with a Construction Environmental Management Plan (CEMP) to be prepared and implemented by the proponent to minimise potential impacts to native vegetation and fauna habitat. The CEMP will be enforced through the Development Approval process and include the following procedures:

- Clearly defining the extent of the clearing area before any clearing activities commence, and vehicle and personnel access limitations to within the Development Envelope.
- Clearly defining habitat trees to be retained within the Amended Clearing Area where possible.

- A pre-clearing fauna inspection to identify potential fauna interactions, including an inspection of trees for hollows and signs of use one (1) to two (2) days before clearing occurs.
- A pre-works trapping program to capture and translocate small to medium sized (translocatable) native fauna, if such fauna is present and translocation is possible.
- A fauna spotter to be present during clearing works to direct and manage works to avoid direct impacts to fauna.
- Implementation of hygiene protocols during the clearing and construction process to appropriately manage construction to prevent potential spread of weeds, dieback and feral animals into areas of retained vegetation. This will include:
  - Vehicles, machinery, and personnel to be free of mud/soil and plant material upon entering the site. Inspections to be completed prior to works commencing.
  - Minimising clearing and earthworks during wet conditions.
  - Using landscaping species not identified as weeds.
  - Ensuring the project is maintained in a clean and tidy manner to ensure feral and other species are not attracted to the site. Waste material is to be disposed of appropriately through waste services and/or to licenced landfill during construction and as part of ongoing operation.

#### 4.3 Offsets

During the assessment process for the previously approved clearing permit (CPS 11017/1), DWER issued a request for further information associated with the identification of satisfactory offsets to enable DWER to progress their assessment of the clearing permit application. DWER indicated that the proposed clearing would result in the following significant residual impacts (SRI):

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

In comparison with the Amended Clearing Area proposed as part of this amendment application, the proposed clearing footprint, including clearing already undertaken, is expected to result in changes to the following SRI based on DWER's assessment:

- 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 Community).

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**).

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.

Preliminary consultation has been undertaken with the Lands Division of the Department of Planning, Lands & Heritage (DPLH) to discuss the feasibility of this approach and appropriate pathway. DPLH confirmed the following process that can be progressed:

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.

This process can be commenced once the proposed offset approach is agreed and confirmed between the Department of Health and DWER.

Based on this, Emerge on behalf of DoHW has completed Appendix A of the *Clearing of native vegetation – offsets procedure* (DWER 2014), and has been attached as **Attachment F**.

The DWER request had also provided completed WA Environmental Offsets Metrics based on suggested/indicative values that had been provided by DWER. Based on these and a review by Emerge based on the extent available information, these preliminary offset calculations have been refined to reflect the new SRI based on the Amended Clearing Area as well as the new proposed onsite environmental offset outcomes for both Banksia woodland TEC/PEC and black cockatoo, which have also been attached as **Attachment G** and **Attachment H** respectively.

In summary, the recommended revisions to these include:

- Banksia woodland TEC/PEC (**Attachment G**):
  - **Conservation Significance:** The Banksia woodland community should be considered as a Priority 3 PEC rather than TEC for the purposes of the application assessment, given its status as a TEC has been considered and resolved under the EPBC Act referral and considered not significant.
  - **Significant Residual Impact:** Quality (scale) of 5.5, on the basis that the impacted Banksia Woodland Community ranges in condition between 'Very Good' (Quality of 6) and 'Good' (Quality of 4), and this reflects an appropriate area weighted Quality score.
  - **Offsets:** The proposed offset area, as shown in **Figure 11**, will deliver offset outcomes through two separate actions consistent with the *WA Environmental Offsets Policy*. A 6.58 ha area of existing native vegetation will be managed to achieve an averted loss outcome, whereby the vegetation is protected and managed to prevent future degradation or clearing. This area is currently assessed as being in 'Very Good' condition, with a current quality score of 6, and is anticipated to improve to an 'Excellent' condition with a future quality score of 8 as a result of the offset management actions, consistent with DWER recommendations. The remaining 0.20 ha comprises previously cleared land and will be addressed through rehabilitation to restore native vegetation values. This area has a current quality score of 0, reflecting historical clearing under CPS 11017/1, and is expected to achieve an 'Excellent' condition with a future quality score of 8 following rehabilitation, consistent with DWER recommendations.
- Black cockatoo (**Attachment H**):
  - **Offsets:** as discussed above, the relevant black cockatoo offset outcomes will be addressed through two separate actions consistent with the *WA Environmental Offsets*

*Policy.* A 6.58 ha area of existing native vegetation will be managed to achieve an averted loss outcome, whereby the vegetation is protected and managed to prevent future degradation or clearing. This area is currently assessed as being in ‘Very Good’ condition, with a current quality score of 6, and is anticipated to improve to an ‘Excellent’ condition with a future quality score of 8 as a result of the offset management actions, consistent with DWER recommendations. The remaining 0.20 ha comprises previously cleared land and will be addressed through rehabilitation to restore native vegetation values. This area has a current quality score of 0, reflecting historical clearing under CPS 11017/1, and is expected to achieve an ‘Excellent’ condition with a future quality score of 8 following rehabilitation, consistent with DWER recommendations.

Based on the above, the proposed on-site environmental offset comprises 6.58 ha of existing native vegetation and 0.20 ha of previously cleared native vegetation, totalling 6.78 ha, and would provide the following extent of offset coverage:

- 256% of the required offset value for Banksia Woodland Community
- 72.4% of the required offset value for black cockatoo.

As recommended by DWER, it is the DoHW intention that a monetary offset would be provided to DWER to address the remaining offset value coverage, and DoHW supports the methodology to determine this sum as provided in the DWER request, but adjusted to reflect the resultant residual offset coverage following the onsite offset approach.

## 5 PLANNING INSTRUMENTS AND OTHER ENVIRONMENTAL APPROVALS

The Applicant is submitting a new Development Approval application under the *Planning and Development Act 2005* (PD Act) to progress the intended development works across the amended Development Envelope. The proposed use is in accordance with the planning framework and in particular the reservation for public purposes that extends over the amended Development Envelope.

A portion of the Amended Clearing Area is situated within PRSNA ‘Greenfields Bushland’. *Environmental Protection Bulletin No. 12 Swan Bioplan – Peel Regionally Significant Natural Areas* (EPB 12) (EPA 2013) is used to inform strategic land use planning in the Peel Region by identifying PRSNA which are expected to have significant flora, vegetation and landform values that represent the original landscape of the Peel Region. Development proposals which may potentially impact upon a PRSNA require detailed flora, vegetation and fauna investigations to be undertaken. Based on the outcomes of these investigations, development proposals should firstly aim to avoid, and then minimise, potential impacts on identified PRSNA.

The avoidance and mitigation measures proposed for the PHC Expansion will reduce the overall impact on the ‘Greenfields Bushland’ area, with a proposed avoidance area of 9.86 ha within the Project Area, and direct and indirect impacts to the adjoining bushland to be identified and managed through a CEMP.

The proposed action that is associated with the ultimate development footprint for the PHC Expansion has been referred for consideration by the Commonwealth Minister for the Environment pursuant to the EPBC Act. This referral was progressed on the basis that there will be impacts to Matters of National Environmental Significance (MNES) arising from the progression of the proposed action arising from clearing required within the Amended Clearing Area, and specifically black cockatoo in accordance with the *EPBC Act black cockatoo referral guidelines* (DAWE 2022) and EPBC Act listed communities in accordance with the Banksia Woodland TEC conservation advice (DoEE 2016) and Tuart woodlands TEC Conservation Advice (DoEE 2019).

An EPBC Act referral was lodged to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) in November 2024, and in March 2025 the decision was made that the referred proposed action was not a controlled action (NCA) and there are no further obligations or requirements on the proponent in order to be able to implement the proposed action. The referral decision notice has been

attached as **Attachment I**. Given the reduction or similarity in relevant impacts, while the amended proposal is not the same as the referred action, given the previous referral decision it is not likely that the proposed action would be considered potentially significant and therefore not need to be re-referred.

The Proponent is not proposing to refer the proposal to the WA Environmental Protection Authority (EPA), pursuant to Section 38 of the EP Act on the basis the proponent is of the view that the proposal is not a significant proposal.

## 6 RESPONSE TO EP ACT CLEARING PRINCIPLES

A total of 2.84 ha of native vegetation occurs within the Amended Clearing Area and is proposed to be cleared. Although the proposed amendment would result in the increase in the extent of native vegetation clearing by 0.02 ha, the Amended Clearing Area has allowed for the further retention of Banksia woodland TEC/PEC in 'very good' condition, which will form part of the Avoidance Area within the northern and eastern portions of the Project Area as shown in **Figure 1**. These retained areas will form part of the required offset area and will be protected.

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 clearing permit application under consideration.

Whilst the proposed amendment is considered to be minor, we have considered and responded to the ten clearing principles in **Table 3** below. Further detail can be reviewed in the original clearing permit application (Emerge Associates 2025).

Table 3: Summary of response to each clearing principle specific to the Amended Clearing Area

Clearing principle	Level of variance	Response to clearing permit principle
Principle (a)	Not at variance	<p>The Amended Clearing Area is highly disturbed as a result of historical clearing within and surrounding the Project Area and is situated within an area ranging from 'good' to 'completely degraded' condition, avoiding areas of higher quality vegetation included within the existing approved clearing permit (CPS 11017/1).</p> <p>With the small extent of the clearing in its broader context, the Amended Clearing Area is not considered to represent a high level of biological diversity, with the higher value vegetation containing higher biodiversity values has been avoided in the Avoidance Area.</p>
Principle (b)	May be at variance	<p>While no evidence of black cockatoos was found, vegetation in the Amended Clearing Area provides habitat for the three black cockatoo species. The vegetation to be cleared within the Amended Clearing Area includes 2.45 ha of primary native foraging habitat for Carnaby's, 2.45 ha of primary native foraging habitat for Forest red-tailed black, 0.31 ha of primary native foraging habitat for Baudin's black cockatoo and 37 potential breeding trees for black cockatoo, none with suitable hollows that could be used for breeding. The residual impacts are not considered to be significant.</p> <p>Overall, the implementation of the Amended Clearing Area has resulted in the reduction of the following black cockatoo values:</p> <ul style="list-style-type: none"> <li>• A reduction in the extent of both 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).</li> </ul>
Principle (c)	Not at variance	No State or Commonwealth listed threatened or priority flora species have been recorded within the Application Area and are considered unlikely to occur. There are no impacts likely to occur.
Principle (d)	May be at variance	<p>Vegetation in the Amended Clearing Area comprises of Banksia woodlands TEC/PEC and Tuart woodlands TEC/PEC. The proposed clearing therefore may be at variance with Principle (d), however residual impacts are not considered to be significant given an EPBC Act referral determined that potential impacts to the EPBC Act listed TECs are not likely to be significant, and the PECs are not considered TECs pursuant to the BC Act.</p> <p>Additionally, implementation of the Amended Clearing Area has reduced the extent of Banksia woodland TEC/PEC clearing by approximately 0.42 ha and has avoided areas of higher-quality Banksia woodland TEC/PEC mapped in 'very good' condition included within the currently approved clearing permit area (CPS 11017/1).</p>
Principle (e)	Not at variance	The vegetation within the Amended Clearing Area is representative of Yoongarillup Complex, which retains 35 percent of its pre-European extent, which is above the 30 per cent threshold outlined in the national objectives and targets for biodiversity conservation in Australia (Commonwealth of Australia 2001). Therefore, the Amended Clearing Area is not considered to be within an extensively cleared landscape.
Principle (f)	Not at variance	There are no wetlands or watercourses within the Amended Clearing Area, and riparian vegetation was not recorded during the Survey. Therefore, the proposed clearing is unlikely to impact on an environment associated with a watercourse or wetland.

Table 3: Summary of response to each clearing principle specific to the Amended Clearing Area (continued)

Clearing principle	Level of variance	Response to clearing permit principle
Principle (g)	Not at variance	The Amended Clearing Area is mapped as the Spearwood S4A Phase (211 Sp_S4a) soil unit, which is mapped as having a low risk of water erosion, land degradation and salinity. Therefore, the proposed clearing is not likely to result in appreciable land degradation. A CEMP will ensure that any risk of land degradation is managed and avoided.
Principle (h)	Not at variance	The Amended Clearing Area is not located immediately adjacent to Bush Forever or conservation reserves. A portion of the application area is situated within PRSNA 'Greenfields Bushland'. The avoidance and mitigation measures proposed will aim to reduce the overall impact on the 'Greenfields Bushland' PRSNA, with a proposed Avoidance Area of 9.86 ha, and indirect impacts to the adjoining bushland to be identified and managed through a CEMP.
Principle (i)	Not at variance	Given no watercourses or wetlands are recorded within or adjacent to the Amended Clearing Area, the proposed clearing is unlikely to impact on surface or groundwater quality.
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.

## 7 SUMMARY AND CLOSING

The proposed Amended Clearing Area reflects the redesigned PHC facility and updated Development Layout Plan (Attachment B), allowing for additional avoidance measures. The redesign of the new proposed PHC facility has been relocated to fit within the existing cleared and degraded areas located within the southern portion of the Project Area, which has reduced the overall amount of native vegetation clearing required, whilst also avoiding and retaining higher quality native vegetation within the designated Avoidance Area.

Clearing associated with forward works for the PHC Expansion Project has commenced, resulting in the clearing of approximately 1.15 ha within the approved clearing permit boundary. These previously cleared areas have been incorporated into the clearing permit amendment, with environmental values assessed based on pre-clearing vegetation conditions. Accordingly, the total Amended Clearing Area, comprising both proposed and previously cleared areas, contains the following environmental values:

- 2.84 of 'native vegetation' as defined by the EP Act.
- 1.49 ha of the Banksia woodlands TEC/PEC.
- 0.01 ha (comprising three (3) individual Tuart trees) of the Tuart woodlands TEC/PEC.
- 2.45 ha of primary native foraging habitat for Carnaby's, black cockatoo.
- 0.31 ha of primary native foraging habitat for Baudin's black cockatoo.
- 2.45 ha of primary native foraging habitat for forest red-tailed black cockatoo.
- 37 potential breeding trees for black cockatoo, none with suitable hollows that could be used for breeding.

Overall, in comparison to the current approved clearing permit (CPS 11017/1), the implementation of the Amended Clearing Area would result in the following:

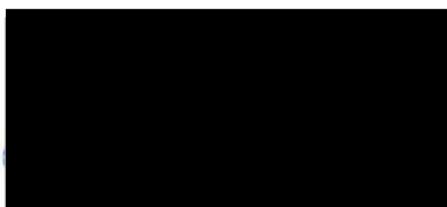
- A reduction in the extent of Banksia woodland Priority Ecological Community (PEC) clearing by approximately 0.42 ha.
- A reduction in the extent of Carnaby's black cockatoo and forest red-tailed black cockatoo primary native foraging habitat clearing by approximately 0.02 ha, together with a reduction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

- Increase in the extent of native vegetation clearing by 0.02 ha.
- Increase the number of black cockatoo potential breeding trees to be cleared by six (6).
- Increase the extent of Baudin's black cockatoo foraging habitat by 0.31 ha.

Emerge believe that the proposed amendment remains consistent with the EP Act Clearing Principles, consistent with the Approved Clearing Permit Area (CPS 11017/1), given the reduction in the overall clearing and increase in retention of Banksia Woodland TEC/PEC and both Carnaby's black cockatoo and Forest red-tailed black cockatoo foraging habitat.

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

Yours sincerely  
Emerge Associates



**Jason Hick**  
PRINCIPAL ENVIRONMENTAL CONSULTANT

Encl: **Figure 1:** Proposed Amendment Area Location  
**Figure 2:** EP Act Native Vegetation Extent  
**Figure 3:** Vegetation Units  
**Figure 4:** Vegetation Condition  
**Figure 5:** Threatened and Priority Ecological Communities  
**Figure 6:** Fauna Habitat  
**Figure 7:** Carnaby's Black Cockatoo Foraging Habitat  
**Figure 8:** Baudin's Black Cockatoo Foraging Habitat  
**Figure 9:** Forest Red-tailed Black Cockatoo Foraging Habitat  
**Figure 10:** Black Cockatoo Habitat Trees  
**Figure 11:** Proposed Offset Area

**Attachment A – Clearing Permit Application Form**

**Attachment B - Peel Health Campus Development Layout Plan**

**Attachment C - Detailed Flora and Vegetation Assessment Peel Health Campus, Greenfields (Emerge Associates 2024b).**

**Attachment D - Basic Fauna and Targeted Black Cockatoo Assessment - Peel Health Campus, Greenfields (Emerge Associates 2024a).**

**Attachment E - Peel Health Campus – Historic Aerial Imagery (Landgate 2024)**

**Attachment F – Appendix A Offset Proposal**

**Attachment G – Preliminary Offset Calculations Banksia Woodland Lot 3001**

**Attachment H – Preliminary Offset Calculations Black cockatoos Lot 3001**

**Attachment I – EPBC Act Referral Decision Notice**

## General References

Department of Agriculture, Water and the Environment (DAWE) 2022, *Referral guideline for 3 WA threatened black cockatoo species: Carnaby's Cockatoo, Baudin's Cockatoo and the Forest Red-tailed Black-cockatoo*, Canberra.

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 Environment and Energy (DoEE) 2019, *Approved Conservation Advice (incorporating listing advice) for the Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain ecological community*, Canberra.

Emerge Associates 2024a, *Basic Fauna and Targeted Black Cockatoo Assessment - Peel Health Campus, Greenfields*, EP24-094(03)--005 NAW, 1.

Emerge Associates 2024b, *Detailed Flora and Vegetation Assessment Peel Health Campus, Greenfields*, EP21-128(04)--008A TDP, 2.

Emerge Associates 2025, *Clearing Permit Application: Peel Health Campus Expansion - 110 (Lot 3001) Lakes Road, Greenfield on Deposited Plan 43727*, EP24-094(06)--008A SPL, Version A, .

Government of Western Australia 2011, *WA Environmental Offsets Policy*.

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

Landgate 2024, *Landgate Locate V5*, Western Australia Land Information Authority, <<https://maps.slip.wa.gov.au/landgate/locate/>>.

Western Australian Planning Commission and Department of Planning, Lands and Heritage (WAPC and DPLH) 2018, *South Metropolitan Peel Sub-regional Planning Framework*, Perth.

## Online References

Department of Water and Environmental Regulation (DWER) 2020c, Perth Groundwater Map, viewed December 2024, <https://maps.water.wa.gov.au/#/webmap/>

