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Clean Energy Link North – Eneabba Substation to Eneabba Terminal 132kV – Clearing Permit application submission.

Western Power proposes to clear native vegetation for the purpose of the construction of a new 12km double circuit 132kV transmission line connecting the Eneabba Zone Substation to the Eneabba Terminal.

Note. This is not a submission under Western Powers existing Clearing Permit, CPS 1918/11. As per recent discussion with Executive Director, Green Energy Unit, Belinda Walker this application is to be assessed by the Green Energy Assessment unit.

The project requires up to 2 ha of permanent clearing within an 83.6 ha envelope to:

- Construct approximately 64 steel poles along the 12km line.
- Construct approximately 11 wooden poles within the Eneabba Terminal.
- Enable minimal underground drilling works at the Eneabba Zone Substation.
- Establish four metre wide access tracks for light vehicle movement during construction (through isolated native vegetation patches where aerial stringing is not feasible).
- Construct two single gantry's south of the Eneabba Terminal.

Note that the vegetation clearing associated with the Eneabba Terminal build are governed by a separate clearing approval, '*Eneabba Terminal Upgrade – CEL N*'. This clearing activity is exempt from standard clearing requirements under *Regulation 5, Item 19 – Clearing of isolated trees*. The decision to separate the clearing activities was based largely on differing timelines and the requirement to expedite Eneabba Terminal construction works prior to the Eneabba lines works.

Western Power has conducted a clearing environmental assessment (see Attachment 1) which has determined the clearing is at variance to principles (a) and (b) and not likely to be at variance to the remaining principles.

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Survey results

A Detailed Flora, Vegetation and Targeted Black Cockatoo Assessment was undertaken in spring 2023 (AECOM, 2024). The survey area was 60-metre wide and 12km long.

- The survey area has high flora diversity with 192 species recorded including eleven Priority flora species, of which ten Priority flora species occur within the Development Envelope (DE).
- No Threatened flora or Threatened Ecological Communities (TECs) or Priority Ecological Communities (PECs) occur within the survey area or will be indirectly impacted.
- A total of 23 vertebrate species were recorded during the survey including 19 birds and three mammals, however no direct or indirect evidence of any Threatened or Priority fauna was recorded.
- Habitat suitable for the Endangered Carnaby's Black Cockatoo was found, although no direct or indirect evidence of their presence was recorded.
- Thirty-three potential nesting trees (no suitable hollows) were recorded within the survey area, of which 17 are within the DE.
- Three fauna habitats were mapped including 'Heath' and 'Mallee Heathland', and one modified (non-native) 'Agriculture' habitat representing disturbed paddocks with weeds and plantation.
- The Heath and Mallee habitats represent 12.52% of the DE and is rated 'moderate' quality (Bamford, 2020).
- The Agricultural paddocks represent 82.3% of the DE and rated 'low' quality habitat (Bamford, 2020).
- Areas of intact vegetation within the survey area were largely in Excellent condition (11.47 ha, 10%).
- All trees were mapped as 'completely degraded' condition.

Impacts relating to principles at variance

- **Principle (a)**

The project has a Proposed Clearing Area (PCA) of up to 2 hectares (ha) of 10.8 hectares of native vegetation within an 83.6 ha DE. Habitat condition ranged from Excellent to Degraded (Mallee and Heath). All trees were mapped as completely degraded. A breakdown of vegetation condition across the DE is provided below in Table 1.

Table 1 Vegetation condition within DE

Vegetation Condition	Amount ha (% of DE)
Excellent	7.9 (9.45%)
Very Good	1.17 (1.39%)
Good	0.2 (0.24%)
Degraded/Completely Degraded	1.54 (1.84%)
Total Native Vegetation	**10.8 (12.9%)**
Cleared (Non-Native)	**72.8 (87.08%)**

- The Mallee Woodland and Heath shrubland foraging habitat (rated as moderate quality habitat) is recognised for the Endangered Carnaby's Black Cockatoo (that is known to occur) and the four Priority fauna species that have the potential to occur.
- Ten Priority flora species were recorded in the DE. To minimise disturbance to the Priority species and foraging habitat, Western Power is exploring alternative construction approaches such as aerial stringing of new conductors to avoid the need for vegetation clearing where feasible. However, following the precautionary principle, Western Power has considered the potential impact to these species should clearing be required. If required, it is expected that vegetation clearing will be primarily restricted to the creation of a vehicle access track with a maximum width of four metres.
- Up to five potential breeding trees may be impacted by the clearing activities.

Given the above comprise a high level of biodiversity, the clearing activities are considered to be at variance to this principle.

- **Principle (b)**

Two native fauna habitats were mapped within the DE. A breakdown of these, their amount within the DE and Bamford (2020) score is provided below in Table 2.

Table 2 Native Fauna habitats within DE

Fauna Habitat	Amount ha (% of DE)	Bamford (2020) rating
Heath	8.8 (10.52%)	Moderate (5)
Mallee Woodland	1.67 (2%)	Moderate (5)

There was no evidence of the foraging habitat being in use within the DE. The nearest breeding sites are 12 and 16km away and the nearest roosting site is 110 km away from the DE. Given this, the low foraging habitat scoring and the fact that similar fauna habitat is extensively available adjacent to and nearby the site, the impacts to fauna are unlikely to be significant. Nonetheless, the clearing will result in clearing of moderate-quality suitable Carnaby's Black Cockatoo foraging habitat (2ha and up to five potential breeding trees). However, this constitutes 0.003% of native vegetation within a 10km radius. Regardless, the significant past clearing of important habitat for this species habitat is acknowledged and this clearing principle is considered to be at variance.

In relation to the proposed clearing the following avoidance, minimisation and mitigation measures will occur:

- Co-locating the new transmission line with the existing 330kV transmission line, thereby utilising existing Western Power easements, access tracks and infrastructure where possible.
- Placing assets outside of sensitive areas and aerial stringing conductors over vegetation where feasible, reducing the need for ground-based machinery and clearing of four metre wide light vehicle tracks.
- Positioning most of the Development Envelope on land that has already been cleared for agriculture.
- Making use of existing farm tracks and previously established access routes to the existing Zone Substation, Terminal and transmission corridor wherever feasible.
- Revising the initial design near the Eneabba Zone substation to eliminate the need for clearing within and nearby the adjacent South Eneabba nature reserve.
- Avoiding mapped Black Cockatoo habitat trees within the Development Envelope wherever possible.
- Avoiding Priority flora species wherever possible.
- No clearing for most of the construction corridor as much of the area is cleared paddocks.
- A Dieback survey has recently been completed. An associated Hygiene Management Plan (HMP) will be prepared with conditions adhered to throughout the construction activities, in order to prevent the spread of Phytophthora cinnamomi and weeds within the DE and surrounding areas.

A Clearing Assessment Report (CAR) has been prepared to support the assessment of this clearing (see Attachment 1).

Additionally, Western Power does not consider the clearing to be significant and is therefore not proposing an offset. Justification for this as follows:

- The Development Envelope (DE) and its surroundings have already undergone substantial historical clearing.
- The proposed clearing area is relatively small, not exceeding 2 hectares over a 12km long corridor.
- The reduced quality of the foraging habitat to be cleared (Bamford score - moderate (5).
- The habitat trees to be cleared offer limited value for Carnaby's Black Cockatoo nesting. While *Eucalyptus todtiana* (2) and other unknown *Eucalyptus* species (3) may be present, these species are not primarily used for nesting (DER, 2016).
- No known Carnaby's Black Cockatoo breeding sites within 12km and no known roosting sites within 110km of the DE.
- No direct or indirect evidence of Black Cockatoo use within found within the survey area.

- Nearby conservation areas such as, South Eneabba Nature Reserve, Tathra National Park, White Gums Nature Reserve, Wotto Nature Reserve, Depot Hill Nature Reserve and Alexander Morrison National Park all offer better quality and contiguous amounts of suitable habitat for the significant species known to occur in the area.

Please find enclosed the following:

- DWER - NV-F01 v12.0 - *Eneabba 132kV_TransmissionLine* - Application for new permit / Referral to clear native vegetation,
- Clearing Assessment Report,
- Shapefile of Development Envelope

Principal, Environmental, Strategy & Policy Advisor
Transmission, Energy, Transition

References

AECOM (2024). *Clean Energy Link North - Flora, Vegetation and Fauna Survey*. Unpublished report

AECOM (*2025). Clean Energy Link North Region Flora, Vegetation and Fauna Assessment*. IBSASUB-20250402-408A7305. IBSA-2025-0148

Bamford Consulting Ecologists. (2020). *Scoring System for the Assessment of Foraging Value of Vegetation for Black Cockatoos*. https://ecologists.bamford.id.au/ecological-consulting/black-cockatoos

Department of the Environment (2016). *Attachment 1: Assessment of Significance – EPBC Act Referral 2016/7706*. Retrieved from Department of the Environment.