

16 December 2025

Department of Water and Environmental Regulation
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Suite 3, 67 Howe Street
Osborne Park WA 6017
ABN 44 981 725 498
Knightside Nominees Pty Ltd

Dear Sir/Madam,

RE: Application to Clear Native Vegetation on Lots 11 and 308 Ayres Road, Forrestdale

On behalf of Richmond (WA) please find following information to support a clearing permit application for 0.829ha of native vegetation on Lots 11 and 308 Ayres Roa, Forrestdale. Certificates of Title are supplied as Attachment 1.

1 Background

Lots 11 and 308 Ayres Roa, Forrestdale, owned by Richmond (WA) are located in the City of Armadale. The Lots total 8.8017ha, of which parts contain native vegetation. The site is proposed to be developed into 13 Industrial Units with Ancillary Offices. The intended land use is consistent with the Industrial zoning of the site and the Forrestdale Business Park West (FBPW) Structure Plan.

A Development Application (DA) for the proposed development has been lodged with the planning authority which for the FBPW area is DevelopmentWA.

2 Flora, Vegetation and Fauna Survey

To assess the environmental attributes on the site a Vegetation Assessment was undertaken by PGV Environmental on 12 December 2025. The report is provided as Attachment 2.

The site has been completely cleared at least twice prior to 1995. Some regrowth of native vegetation has occurred in small areas. The main regrowth is associated with a Resource Enhancement wetland at the western end of Lot 11 which contains *Astartea scoparia* and *Melaleuca viminea* vegetation in Good-Very Good condition. A Multiple Use wetland also occurs on Lot 308 and contains several Paperbark trees over a weedy understorey. The wetland management categories are considered appropriate.

The regrowth native vegetation is not representative of a Threatened or Priority Ecological Community.

No Threatened or Priority plant species are expected to occur on the site due to the past level of disturbance and small area of native vegetation.

The Fauna Habitat on the site is also greatly impacted with very limited habitat. The trees on the site are all non-native to the area. Accordingly, there is no Black Cockatoo habitat on the site.

3 Avoidance and Mitigation Measures

The applicant intends to develop the site in its entirety in accordance with the FBPA Structure Plan.

4 Ten Clearing Permit Principles

The Ten Clearing Principles have been addressed below to determine the environmental impact that the removal of the native vegetation on the site would have.

Principle (a): Vegetation should not be cleared if it comprises a high level of biological diversity.

The vegetation on the site is mostly Degraded and Completely Degraded due to the past clearing. A small area of Good-Very Good vegetation occurs at the western end of the site. As a result, the vegetation does not have a high level of biological diversity.

The proposed clearing is considered not at variance to this principle.

Principle (b): Vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.

The fauna habitat is in poor condition with high levels of disturbance and is not considered significant habitat. The vegetation is fragmented, disturbed and has limited ecological linkage value. The proposed clearing is considered not at variance to this principle.

Principle (c): Vegetation should not be cleared if it includes, or is necessary for the continued existence of rare flora.

No Threatened or Priority plant species are likely to occur on the site given the clearing and high levels of disturbance. Therefore, the proposed clearing is considered not at variance to this principle.

Principle (d): Vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of a threatened ecological community.

The vegetation on the site is not representative of a Threatened Ecological Community. Therefore, the proposed clearing is considered not at variance to this principle.

Principle (e): Vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.

The site is not a significant remnant of vegetation. Therefore, the proposed clearing is considered not at variance to this principle.

Principle (f): Vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.

The site contains a Resource Enhancement (RE) wetland and part of a Multiple Use wetland. The RE wetland corresponds to the area of native *Astartea* and *Melaleuca viminea* vegetation on Lot 11. The MU wetland contains several Paperbark trees with a Completely Degraded understorey.

The proposed clearing may be at variance to this principle, however given the small size of the RE wetland, and the Negotiated Planning Solution endorsed by the EPA in 2013, the impact is not considered to be significant.

Principle (g): Vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.

Clearing the vegetation on the site will not result in land degradation as the land will be stabilised during construction of the industrial land use.

The proposed clearing is considered not at variance to this principle.

Principle (h): Vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.

Bush Forever Site 342 Anstey-Keane Bushland is located across Anstey Road to the north-west. Drainage from the development will be contained on site and not enter the Bush Forever site. The proposed clearing is considered not at variance to this principle.

Principle (i): Vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.

The proposed development will be designed in accordance with *Better Urban Water Management*. Stormwater will be managed by controls associated with a planning approval. The proposed clearing is considered not at variance to this principle.

Principle (j): Vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence of flooding.

The site is largely cleared already. Clearing the small amount of native vegetation is highly unlikely to cause or exacerbate the incidence of flooding. Therefore, the proposed clearing is considered not at variance to this principle.

Please contact me if you would like to discuss the application.

Yours sincerely



Paul van der Moezel
Managing Director

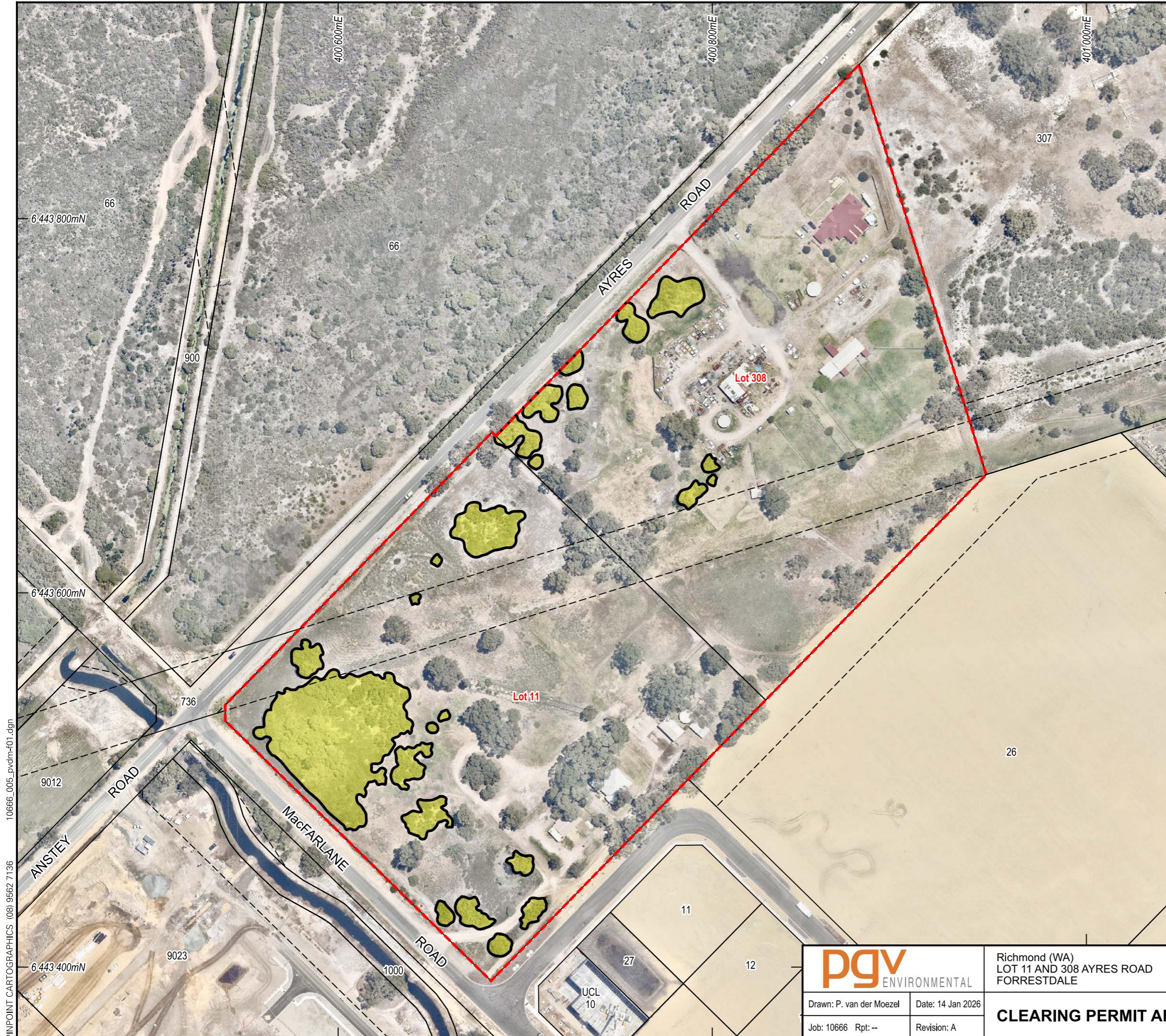
Provided as part of the Clearing Permit Application:

Clearing Permit Application Form
Shapefiles showing Application Area
Figure showing Application Area

Attachments:

Attachment 1 –Certificates of Title
Attachment 2 – Vegetation Assessment (PGV Environmental)

Figure



PGV
ENVIRONMENTAL

Drawn: P. van der Moezel Date: 14 Jan 2026

Job: 10666 Rpt: -- Revision: A

Richmond (WA)
LOT 11 AND 308 AYRES ROAD
FORRESTDALE

CLEARING PERMIT AREA

Figure 1

ATTACHMENT 1

Certificates of Title

WESTERN



AUSTRALIA

TITLE NUMBER

Volume Folio

2931 505

RECORD OF CERTIFICATE OF TITLE UNDER THE TRANSFER OF LAND ACT 1893

The person described in the first schedule is the registered proprietor of an estate in fee simple in the land described below subject to the reservations, conditions and depth limit contained in the original grant (if a grant issued) and to the limitations, interests, encumbrances and notifications shown in the second schedule.

BG Roberts
REGISTRAR OF TITLES



LAND DESCRIPTION:

LOT 308 ON DEPOSITED PLAN 64746

REGISTERED PROPRIETOR: (FIRST SCHEDULE)

RISANA INVESTMENTS PTY LTD OF 160 AYRES ROAD FORRESTDALE WA 6112

(T Q575930) REGISTERED 8/9/2025

LIMITATIONS, INTERESTS, ENCUMBRANCES AND NOTIFICATIONS: (SECOND SCHEDULE)

1. C856697 EASEMENT TO DBGNP LAND ACCESS MINISTER THE STATE ENERGY COMMISSION OF WESTERN AUSTRALIA. SEE SKETCH ON VOL 1849 FOL 016. REGISTERED 13/9/1984.
H619496 SUNDAY. THE GRANTEE OF TRANSFER C856697 IS NOW THE DBGNP LAND ACCESS MINISTER PURSUANT TO THE DAMPIER TO BUNBURY PIPELINE ACT 1997. REGISTERED 11/12/2000.
2. EASEMENT BURDEN CREATED UNDER SECTION 27A OF T. P. & D. ACT - SEE DEPOSITED PLAN 64746 AS CREATED ON PLAN 16906.
3. H619496 SUNDAY. PORTION OF THE LAND HEREIN IS WITHIN THE DBGNP CORRIDOR PURSUANT TO THE DAMPIER TO BUNBURY PIPELINE ACT 1997. SEE LAND ADMINISTRATION PLAN 15573. REGISTERED 11/12/2000.
4. P607947 EASEMENT BENEFIT FOR DRAINAGE PURPOSES. SEE DEPOSITED PLAN 417836. REGISTERED 4/9/2023.
5. P607943 EASEMENT BENEFIT FOR DRAINAGE PURPOSES. SEE DEPOSITED PLAN 418125. REGISTERED 4/9/2023.
6. P607948 EASEMENT BENEFIT FOR DRAINAGE PURPOSES. SEE DEPOSITED PLAN 417835. REGISTERED 4/9/2023.
7. P607952 EASEMENT BENEFIT FOR DRAINAGE PURPOSES. SEE DEPOSITED PLAN 418603. REGISTERED 4/9/2023.
8. P607944 EASEMENT BENEFIT FOR DRAINAGE PURPOSES. SEE DEPOSITED PLAN 418842. REGISTERED 4/9/2023.

Warning: A current search of the sketch of the land should be obtained where detail of position, dimensions or area of the lot is required.
Lot as described in the land description may be a lot or location.

-----END OF CERTIFICATE OF TITLE-----

END OF PAGE 1 - CONTINUED OVER

RECORD OF CERTIFICATE OF TITLE

REGISTER NUMBER: 308/DP64746

VOLUME/FOLIO: 2931-505

PAGE 2

STATEMENTS:

The statements set out below are not intended to be nor should they be relied on as substitutes for inspection of the land and the relevant documents or for local government, legal, surveying or other professional advice.

SKETCH OF LAND: DP64746

PREVIOUS TITLE: 1849-168

PROPERTY STREET ADDRESS: 160 AYRES RD, FORRESTDALE.

LOCAL GOVERNMENT AUTHORITY: CITY OF ARMADALE

WESTERN



AUSTRALIA

TITLE NUMBER

Volume Folio

1849 169

RECORD OF CERTIFICATE OF TITLE UNDER THE TRANSFER OF LAND ACT 1893

The person described in the first schedule is the registered proprietor of an estate in fee simple in the land described below subject to the reservations, conditions and depth limit contained in the original grant (if a grant issued) and to the limitations, interests, encumbrances and notifications shown in the second schedule.

BG Roberts
REGISTRAR OF TITLES



LAND DESCRIPTION:

LOT 11 ON PLAN 16906

REGISTERED PROPRIETOR: (FIRST SCHEDULE)

RISANA INVESTMENTS PTY LTD OF SUITE 1 567 HAY STREET DAGLISH WA 6008
(T Q575856) REGISTERED 8/9/2025

LIMITATIONS, INTERESTS, ENCUMBRANCES AND NOTIFICATIONS: (SECOND SCHEDULE)

1. C856697 EASEMENT TO THE STATE ENERGY COMMISSION OF WESTERN AUSTRALIA. SEE SKETCH ON VOL 1849 FOL 169. REGISTERED 13/9/1984.
2. EASEMENT BURDEN CREATED UNDER SECTION 27A OF T. P. & D. ACT - SEE PLAN 16906.
3. H619496 H619496 SUNDAY. THE GRANTEE OF TRANSFER C856697 IS NOW THE DBNPG LAND ACCESS MINISTER PURSUANT TO THE DAMPIER TO BUNBURY PIPELINE ACT 1997. REGISTERED 11/12/2000.
3. H619496 SUNDAY. PORTION OF THE LAND HEREIN IS WITHIN THE DBNPG CORRIDOR PURSUANT TO THE DAMPIER TO BUNBURY PIPELINE ACT 1997. SEE LAND ADMINISTRATION PLAN 15573. REGISTERED 11/12/2000.

Warning: A current search of the sketch of the land should be obtained where detail of position, dimensions or area of the lot is required.
Lot as described in the land description may be a lot or location.

-----END OF CERTIFICATE OF TITLE-----

STATEMENTS:

The statements set out below are not intended to be nor should they be relied on as substitutes for inspection of the land and the relevant documents or for local government, legal, surveying or other professional advice.

SKETCH OF LAND: 1849-169 (11/P16906)

PREVIOUS TITLE: 1173-233

PROPERTY STREET ADDRESS: 87 MACFARLANE RD, FORRESTDALE.

LOCAL GOVERNMENT AUTHORITY: CITY OF ARMADALE

NOTE 1: K897161 SECTION 138D TLA APPLIES TO CAVEAT K524642

NOTE 2: K919974 SECTION 138D TLA APPLIES TO CAVEAT K679633

ATTACHMENT 2

Vegetation Assessment (PGV Environmental)

16 December 2025

Godje Craig

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Mob +61 0 427 005 226

Email paul@pgv.net.au

Senior Development Manager
Richmond (WA)
Suite 1/567 Hay Street
Daglish WA 6008

Suite 3, 67 Howe Street
Osborne Park WA 6017

ABN 44 981 725 498
Knightside Nominees Pty Ltd

Dear Godje,

RE: Lot 11 and 308 Ayres Road, Forrestdale – Vegetation Assessment

Following is our vegetation assessment of Lots 11 and 308 Ayres Road Keane Road, Forrestdale (the site).

Our advice is based on a review previous flora surveys undertaken on the site as part of the Forrestdale Business Park West Structure Plan in 2011 as well as information from desktop sources and from a site assessment on 12 December 2025.

1 Site Description

Examination of historic aerial photography shows that the site was partly cleared in the past prior to 1953 (Plate 1). The western corner appears to have been part of a wetland.

Plate 1: Aerial from 1953 (Lot 308 is shown for reference)



The 1977 aerial photograph shows the site is almost completely cleared with only a few scattered shrubs or trees and some vegetation associated with the wetland on Lot 11 (Plate 2).

Plate 2: Aerial from 1977



The 1995 aerial shows most of the site has been cleared, including the western wetland (Plate 3).

Plate 3: Aerial from 1995



The 2000 aerial photograph shows some regeneration in the western wetland and some vegetation in the north-west corner of Lot 308 that is also a wetland (Plate 4). Some scattered trees and shrubs appear on the 2000 aerial.

Plate 4: Aerial from 2000



Plate 5 shows the current condition of the vegetation on the site. The western wetland has regrown considerably as has the growth of trees and shrubs elsewhere on the site. The wetland in the north-west corner of Lot 308 appears to have degraded since 2000.

Plate 5: Aerial from 2025



2 Vegetation

2.1 Cardno Survey 2010

A vegetation survey of the site was undertaken by Cardno in 2010 as part of the studies for the Forrestdale Business Park West Structure Plan. The vegetation was mapped by Cardno as:

As – Thicket of Astartea scoparia over a mixed Herb and Grassland

CP – Paddocks with scattered native, planted exotics and pasture grasses

The two areas of As vegetation coincide with the small area of wetland vegetation on both lots.

Plate 6: Cardno Vegetation Map (2010) Plate 7: Cardno Vegetation Condition Map (2010)



Cardno rated the As vegetation in both areas as being in Good-Degraded condition.

2.2 PGV Environmental Assessment

PGV Environmental mapped two intact vegetation types on the site as well as three vegetation types that are scattered or groups of native trees (Attachment 1). In addition, many non-native trees and shrubs are mapped as exotic trees and shrubs on the vegetation map.

The vegetation types mapped are:

- Native vegetation
 - Mv** *Melaleuca viminea* Tall Open Scrub
 - As** *Astartea scoparia* Closed Low Heath
 - Kg** *Kunzea glabrescens* (Spearwood) shrubs
 - Mp** *Melaleuca preissiana* (Paperbark) tall shrubs
- Non-native vegetation
 - Ex** Exotic trees and shrubs

The two areas of intact native vegetation are associated with the wetland at the western end of Lot 11 (Plate 8). *Melaleuca viminea* shrubs are 3-4m high and at a high density. Adjacent to the *Melaleuca viminea* vegetation is a dense, lower layer of *Astartea scoparia* shrubs.

Plate 8: *Melaleuca viminea* Tall Open Scrub (background) and *Astartea scoparia* Closed Low Heath (foreground)



Native Spearwood (*Kunzea glabrescens*) occurs as scattered individual tall shrubs as well as small stands (Plate 9).

Plate 9: *Kunzea glabrescens* Shrubs



The mapped wetland on Lot 308 contains some tall *Melaleuca preissiana* (Paperbark) shrubs up to 6m high over a cleared understorey that is grazed by sheep (Plate 9).

The exotic trees on the site are mostly River Red Gums (*Eucalyptus camaldulensis*), Rose Gum (*Eucalyptus grandis*), some Swamp Mahogany (*Eucalyptus robusta*) and a few Tuarts (*Eucalyptus gomphocephala*) and WA Peppermints (*Agonis flexuosa*) which are not native to this area.

The exotic shrubs include several Bottlebrushes on Lot 308.

Plate 10: *Melaleuca preissiana* Shrubs in Wetland on Lot 308



Plate 9: Exotic River Red Gums on Site



The intact area of native vegetation is not representative of a Threatened or Priority Ecological Community.

The vegetation is not likely to support any threatened or priority flora species due to the past history of clearing and the very small area of Good to Very Good vegetation in the western area.

3 Wetlands

According to the Geomorphic Wetland mapping, there is a Resource Enhancement (RE) wetland (Unique Feature Identifier (UFI) 15833) mapped on the western corner of Lot 11 (Plate 10). Based on the vegetation type and condition in this wetland PGV Environmental considers that the RE management rating is appropriate. A Multiple Use (MU) wetland (UFI 15834) is mapped in the northwestern portion of Lot 308. Based on the Completely Degraded vegetation condition in this wetland PGV Environmental considers that the MU management category is appropriate.

Plate 10: Wetland Mapping (dark green is CCW, light green is REW, blue is MUW)



There is an RE Wetland mapped on the lot to the south-east (UFI 15832). The RE Wetland has been cleared and earthworked for development.

4 Negotiated Planning Solution

A part of the FBPW Structure Plan area was initially with Bush Forever Site 342 (Anstey/Keane Dampland and Adjacent Bushland, Forrestdale). The Lots (68 and 70 Anstey Road) contained native vegetation that was identified as having regional environmental significance. Due to the lots being zoned for Industrial purposes, the final boundaries of the area to be protected in the Bush Forever site were considered as part of a Negotiated Planning Solution (NPS). The result of the negotiations resulted in all of Lot 68 and a portion of Lot 70 (which became Lot 800) being transferred free of cost to the WAPC.

The FBPW Structure Plan was submitted to government agencies for comment in 2012. The EPA provided its advice to the MRA in 2012 and later in 2013 to DPaW clarifying the areas to be developed. In their advice to DPaW (Attachment 2) the EPA referred to the Negotiated Planning Solution which resulted in all of Lot 68 and part of Lot 70 being transferred to the WAPC for protection within Bush Forever Site 342. The EPA concluded that while the NPS was originally done as part of the Bush Forever negotiations the NPS was also a good environmental outcome for the broader Forrestdale Business Park West Structure Plan area.

The EPA concluded its advice by stating that "it is the EPA's view that the NPS and Forrestdale Business Park West Structure Plan, as outlined in the attached map, protects the most significant environmental

values in the locality". The Structure Plan attached to the EPA advice shows all of Lot 11 and 308 to be developed with no requirement to retain any native vegetation.

5 Clearing Permit

The areas of native regrowth vegetation on the site are considered to meet the definition of native vegetation. The clearing of native vegetation in Western Australia requires a clearing permit under the *Environmental Protection Act 1986* unless an exemption applies.

There are two types of exemptions from a clearing permit; Schedule 6 exemptions and exemptions under the *Environmental Protection (Clearing of Native Vegetation) Regulations 2014*. The most likely relevant Schedule 6 exemption for the site is for clearing that is done as part of an approved subdivision. That could be applied to the site if subdivision is being considered.

The *Environmental Protection (Clearing of Native Vegetation) Regulations 2019* provide exemptions to a range of different activities. The most relevant activity for the site would be clearing of less than 5ha per year that is done for the construction of a building. However, the Environmental Protection Regulation exemptions do not apply in an Environmentally Sensitive Area (ESA). The site is mapped as an ESA (Plate 11) therefore the exemption for a building or structure under 5ha would not apply under the clearing permit system.

Plate 11: Environmentally Sensitive Area (green on map)



In summary, clearing the areas of native vegetation on Lot 11 and 308 will require a clearing permit unless an exemption applies through an approved subdivision.

6 Commonwealth Approvals

The site does not contain any Matters of National Environmental Significance that would require a referral under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

7 Summary

In summary,

- The site has been completely cleared at least twice prior to 1995. Some regrowth of native vegetation has occurred in small areas, particularly at the western end near the corner of MacFarlane and Ayres Road;
- The areas of intact regrowth native vegetation contain dense *Astartea scoparia* and *Melaleuca viminea* vegetation. This vegetation type is typical of wetland soils;
- The *Astartea scoparia* and *Melaleuca viminea* vegetation has regenerated to a Good to Very Good condition. The other areas of scattered native shrubs are in a parkland cleared setting and rated as Completely Degraded;
- The vegetation is not representative of a Threatened or Priority Ecological Community;
- No Threatened or Priority plant species are expected to occur on the site due to the past level of disturbance and small area of native vegetation;
- The site contains an RE wetland and part of an MU wetland. The RE wetland corresponds to the area of native *Astartea* and *Melaleuca viminea* vegetation on Lot 11. The MU wetland contains several Paperbark trees with a Completely Degraded understorey;
- The areas of native vegetation on the site require a clearing permit unless an exemption applies. A subdivision approval is likely to provide a Schedule 6 exemption. The exemptions afforded by the *Environmental Protection (Clearing of Native Vegetation) Regulations 2019* do not apply as the site is all mapped within an Environmentally Sensitive Area; and
- A referral under the Commonwealth EPBC Act is not required as there are no Matters of National Environmental Significance on the site.

Please contact me if you require any clarification of this assessment.

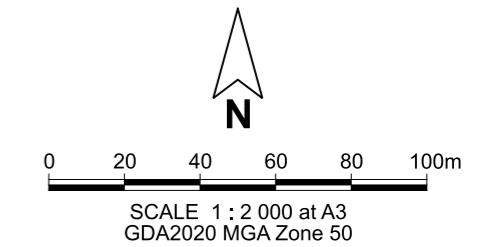
Yours sincerely



Paul van der Moezel
Managing Director

Attachment 1: Figure 1 Vegetation Types

Attachment 2: Figure 2 Vegetation Condition



Legend

— Site Boundary
— Cadastral Boundary
- - - Easement Boundary
— Vegetation Type Boundary
Mp Vegetation Type

Vegetation Types

Native vegetation

-  **Kg**
Kunzea glabrescens (Spearwood) shrubs
-  **Mp**
Melaleuca preissiana (Paperbark) tall shrubs
-  **Mv**
Melaleuca viminea Tall Open Scrub
-  **As**
Astartea scoparia Closed Low Heath

Non-native vegetation

Ex Exotic Trees and Shrubs

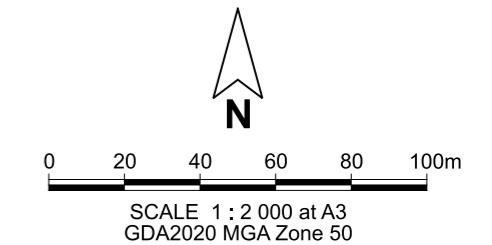
CADASTRAL SOURCE: Landgate, December 2025.
AERIAL PHOTOGRAPH SOURCE: NearMap, flown November 2025.

pgv ENVIRONMEN

AL Richmond (WA)
LOT 11 AND 308 AYRES ROAD
FORRESTDALE

Drawn: P. van der Moezel	Date: 14 Jan
Job: 10666 Rpt: --	Revision: A

VEGETATION TYPES



Legend

- Site Boundary
- Cadastral Boundary
- - - Easement Boundary
- Vegetation Condition Boundary

Vegetation Condition

-  Good to Very Good
-  Completely Degraded

Vegetation Condition

P - Pristine
Pristine or nearly so, no obvious signs of disturbance.

Excellence

EX - Excellent Vegetation structure intact, disturbance affecting individual species and weeds are non aggressive species.

VG - Very Good

Vegetation structure altered, obvious signs of disturbance. For example, disturbance to vegetation structure caused by repeated fires, the presence of some more aggressive weeds, dieback, logging and grazing.

G - Good

Vegetation structure significantly altered by very obvious signs of multiple disturbance. Retains basic vegetation structure or ability to regenerate it. For example, disturbance to vegetation structure caused by very frequent fires, the presence of some very aggressive weeds at high density, partial clearing, dieback and grazing.

D - Degrade

Basic vegetation structure severely impacted by disturbance. Scope for regeneration but not to a state approaching good condition without intensive management. For example, disturbance to vegetation structure caused by very frequent fires, the presence of very aggressive weeds, partial clearing, dieback and grazing.

CD - Completely Degraded

33 Completely Degraded The structure of the vegetation is no longer intact and the areas is completely or almost completely without native species. These areas are often described as 'parkland cleared' with the flora composing weed or crop species with isolated native trees or shrubs.

CI - Cleare

~~CP - cleared~~ No native vegetation remaining.

CADASTRAL SOURCE: Landgate, December 2025.
AERIAL PHOTOGRAPH SOURCE: NearMap, flown November 2025.

pgv
ENVIRONMENT

AL
Richmond (WA)
LOT 11 AND 308 AYRES ROAD
FORRESTDALE

Drawn: P. van der Moezel	Date: 14 Ja
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VEGETATION CONDITION