

16 December 2025

Department of Water and Environmental Regulation  
Locked Bag 10  
Joondalup DA WA 6919



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.*

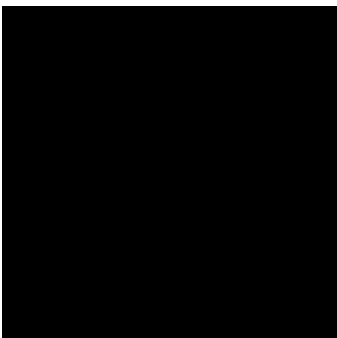
The proposed development will be designed in accordance with *Better Urban Water Management*. Stormwater will be managed by controls associated with a planning approval. The proposed clearing is considered not at variance to this principle.

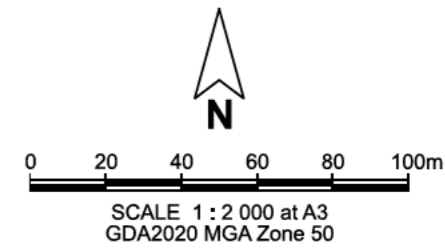
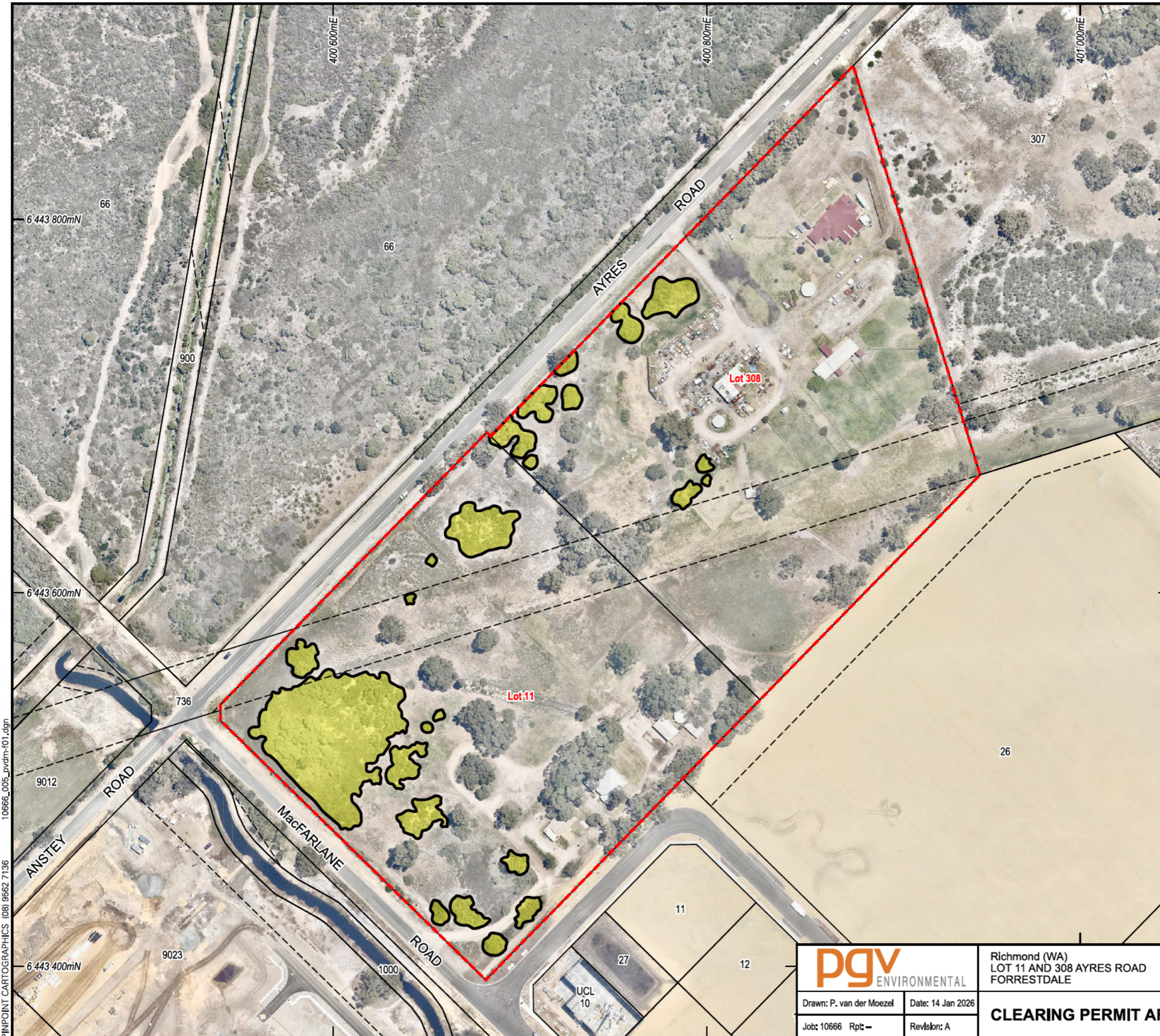
*Principle (j): Vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence of flooding.*

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





- Legend**
- - - Site Boundary
  - Cadastral Boundary
  - - - Easement Boundary
  - Clearing Permit Area

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

**pgv** ENVIRONMENTAL

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

Job: 10666 Rpt: —    Revision: A

Richmond (WA)  
 LOT 11 AND 308 AYRES ROAD  
 FORRESTDAL

**CLEARING PERMIT AREA**

**Figure 1**

PINPOINT CARTOGRAPHICS (08) 9562 7136 10666\_005\_pvdmm-101.dgn

**ATTACHMENT 2**

**Vegetation Assessment**  
**(PGV Environmental)**

16 December 2025

Godje Craig

Senior Development Manager



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 considerable 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.

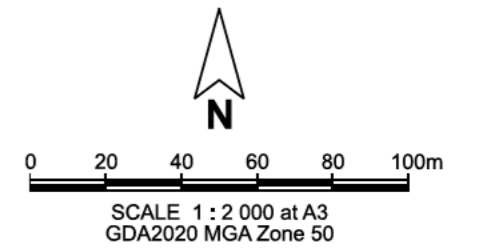
Please contact me if you require any clarification of this assessment.

Yours sincerely



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
  - **Cleared**

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

**pgv** ENVIRONMENTAL

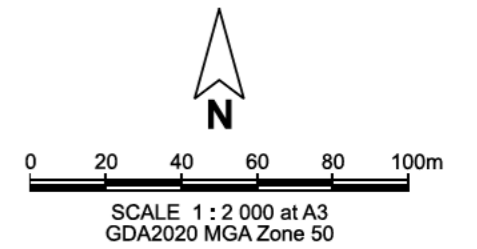
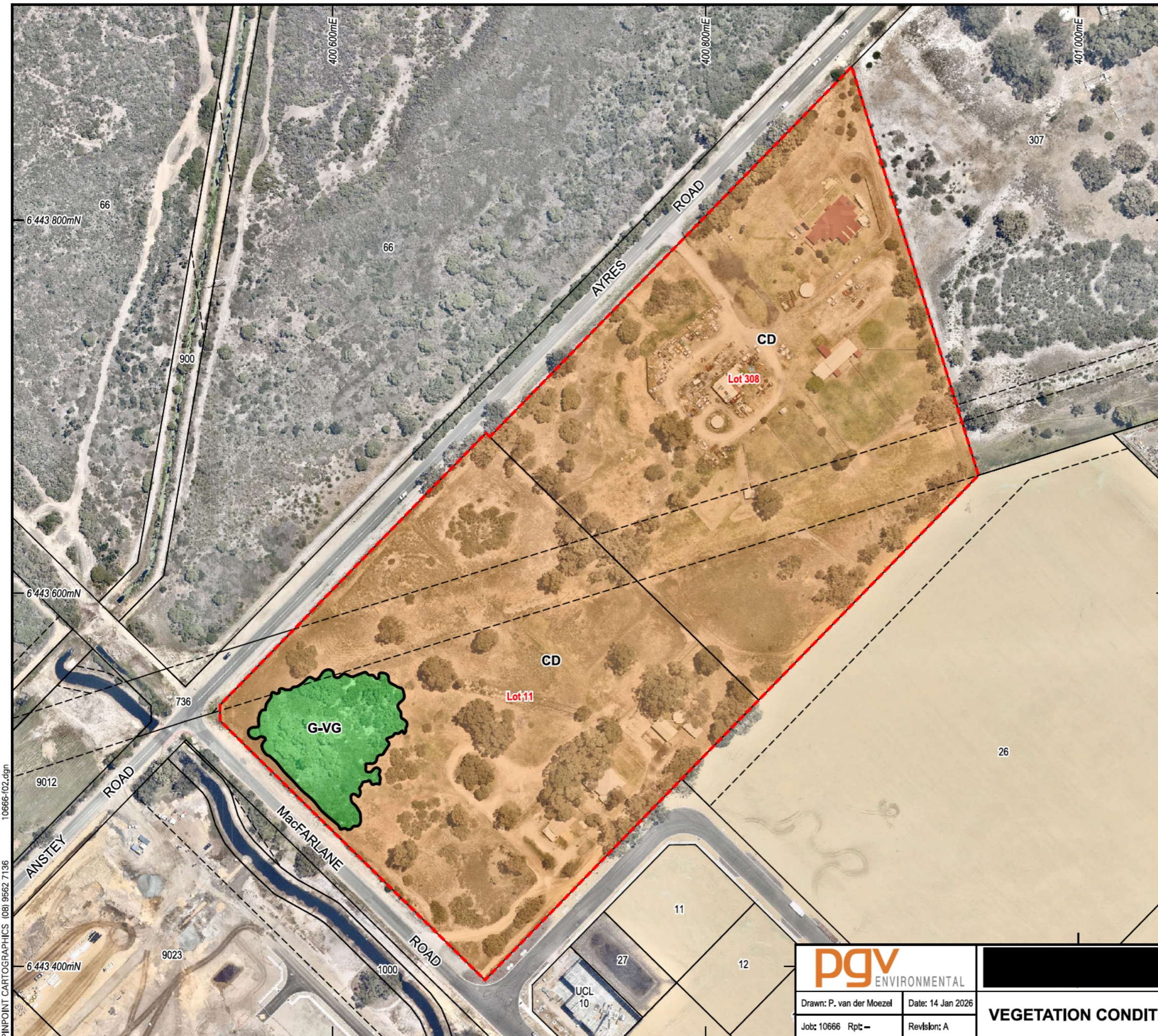
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**VEGETATION TYPES**

**Figure 1**

PINPOINT CARTOGRAPHICS (08) 9562 7136 10666-f01.dgn



- Legend**
- - - - Site Boundary
  - Cadastral Boundary
  - - - - Easement Boundary
  - Vegetation Condition Boundary
- Vegetation Condition**
- Good to Very Good
  - Completely Degraded

**Vegetation Condition**  
(SOURCE: Bush Forever, Govt. of W.A., 2000)

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

**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 - Degraded**  
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**  
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 - Cleared**  
No native vegetation remaining.

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

**pgv** ENVIRONMENTAL

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VEGETATION CONDITION

**Figure 2**

PINPOINT CARTOGRAPHICS (08) 9562 7136 10666-f02.dgn