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RE: (SW767) Stormwater pipe replacement (SLK 0.64) Gifford Road, City of Busselton: Clearing Permit application

The City of Busselton ('the City') proposes to undertake urgent stormwater infrastructure works along Gifford Road, Dunsborough, within the City of Busselton. The works are required to address the failure of a stormwater pipe (DN750) within Armstrong Reserve (Reserve 25229), which has collapsed in two locations (SLK 0.51–0.52 and 0.54–0.56).

The project is essential for public safety and involves decommissioning the failed pipe in situ and installing a replacement stormwater pipe connecting from an existing headwall, then running underground along the western verge of Gifford Road. This alignment has been selected to minimise the extent of native vegetation clearing required.

To accommodate the works, selective minor clearing will be required within Armstrong Reserve at SLK 0.64, providing access to the existing headwall approximately 8.5 m from the reserve boundary. The proposed disturbance footprint is approximately 0.006 ha. This cover letter has been prepared to provide background and supporting information for a Clearing Permit application, required under section 51E of the *Environmental Protection Act 1986* (draft attached).

A preliminary assessment against the clearing principles indicates that the project may be at variance to Principles a, b, and e, and is not at or not likely to be at variance to the remaining Principles. Due to the small scale of the clearing area (0.006 ha), and proposed Revegetation Management Plan (detailing guidelines for the reinstatement of vegetation and weed control management), formal offsets are not proposed.

- **Attachment 1** Proposal background and assessment against the 10 clearing principles
- **Attachment 2** Draft Clearing (Area) Permit Application

If you would like to discuss further, please feel to call me on [REDACTED]

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ATTACHMENT 1

BACKGROUND

Proposal background

The City of Busselton ('the City') proposes to undertake urgent stormwater infrastructure works along Gifford Road, Dunsborough, within the City of Busselton. The project Study Area is located approximately 500 m north of the Dunsborough town centre, as shown in Attachment 2. The works are considered essential and a high priority for public safety.

The works are required to address the failure of a stormwater pipe (DN750) which has collapsed in two locations within Armstrong Reserve (Reserve 25229) (SLK 0.51–0.52 and 0.54–0.56). The reserve is categorised as Class 'C' bushland, supporting 3.51 ha of remnant native vegetation, and is vested with the City of Busselton for the purpose of 'Recreation'.

The proposed works involve decommissioning the failed pipe in situ via infilling with concrete slurry and installing a new underground stormwater pipe from the existing headwall, connecting to the western verge of Gifford Road where it will be aligned underground along the existing cleared and maintained road verge.

To accommodate the works, selective minor clearing will be required within Armstrong Reserve at SLK 0.64, as delineated in Attachment 2. This clearing is necessary to provide access to the existing headwall and facilitate connection of the replacement pipe to the road verge. The proposed disturbance footprint is approximately 0.006 ha.

As clearing of native vegetation is required, the City will submit a Clearing Permit (Area Permit) Application to the Department of Water and Environmental Regulation (DWER). The City has considered measures to avoid, minimise, mitigate and manage proposed clearing impacts and reinstate the vegetation. A preliminary assessment of the residual impacts of clearing is provided against the 10 Clearing Principles.

Biodiversity surveys were undertaken in Spring 2025 by SW Environmental to inform the environmental assessment process, guide the project design and inform the Clearing Permit application. Proposed flora, fauna and vegetation impacts were assessed during a site inspection by SW Environmental [REDACTED] [REDACTED] on the 24th of October 2025 with [REDACTED] [REDACTED] and follow up surveys with [REDACTED]

Summary of the flora, fauna and vegetation values

Key flora, fauna and vegetation values of the proposed clearing area are listed below:

- The vegetation within the proposed clearing footprint is in Very Good condition (EPA, 2016), and does not represent a Threatened Ecological Community.
- The Survey Area is located within a known Priority Ecological Community (PEC) *Corymbia calophylla*, *Melaleuca raphiophylla*, *Banksia littoralis*, *Eucalyptus rudis*, *Agonis flexuosa* low open forest with seasonal subsoil moisture (Dunsborough area) (Priority 1).
- One structural vegetation unit was mapped within the Study Area, described as:
 - *Corymbia calophylla*, *Eucalyptus rudis* subsp. *cratyantha*, *Melaleuca raphiophylla* and *Agonis flexuosa* open forest over *Acacia pulchella* and *Hibbertia cuneiformis*, shrubland over *Machaerina juncea*, *Anigozanthos flavidus*, and *Lobelia anceps* herb and sedgeland, with patches of **Cenchrus clandestinus* and **Cynodon dactylon* (Photo 1) – 0.006 ha.

- One state-listed species of conservation significance was recorded within Armstrong Reserve, *Eucalyptus rudis* subsp. *cratyantha* (Priority 4). One plant was recorded in the proposed clearing area with an additional two located just outside the proposed boundaries.
- There were no suitable Diameter at Breast Height trees (> 50cm DBH) within the area under application and no trees with potential to be used by black cockatoo¹ for breeding. No evidence of black cockatoo roosting or foraging was found within the clearing area, broader road reserve or adjacent vegetation.
- Critically Endangered Western Ringtail Possums (*Pseudocheirus occidentalis*) (WRP) occur with Armstrong Reserve, with one active drey observed in the proposed clearing area and a second just outside the boundary. An authorised fauna spotter will be present prior to and during clearing to manage WRP and other fauna. Impacts to WRP are considered low due to the small scale and nature of required clearing, the plans to retain most of the habitat patch, and the proposed revegetation of cleared areas.
- It is unlikely that the proposed clearing area would provide significant habitat for any other conservation significant fauna.

¹ Black cockatoos collectively refers to

- Forest Red-tailed Black-Cockatoo (*Calyptorhynchus banksii* subsp. *naso*) (Vulnerable)
- Baudin's Black Cockatoo (*Zanda baudinii*) (Endangered)
- Carnaby's Black Cockatoo (*Zanda latirostris*) (Endangered)



Photo 1 – Vegetation present within Survey Area (looking from Gifford Road)



Photo 2 – Vegetation present within Survey Area (looking towards Gifford Road)

PRELIMINARY CLEARING ASSESSMENT

Measures to avoid, minimise, mitigate and manage proposed clearing impacts

The City has progressed the project design with an emphasis on avoiding and or minimising impacts to native vegetation where impacts cannot be directly avoided. Some clearing is unavoidable as an excavator is required to carry out the work safely. To protect and enhance the remaining environmental values within the site, the design process included the following measures, applied to directly avoid or minimise the impact to native vegetation:

- Project Managers met with construction contractors to ensure machinery and construction techniques would result in keeping clearing areas to a minimum, where possible.
- The proposed impact area will be clearly delineated and flagged prior to works commencing.
- A design package was developed to minimise access impacts.
- The preferred access was modified to retain additional remnant trees, where possible. The original design proposed repair of the failed stormwater pipe within the reserve via excavation and would have resulted in extensive clearing along the older pipeline alignment. This was redesigned to decommission the existing pipe in-situ through concrete filling, with a replacement pipe installed along the cleared road verge. This change reduced the total clearing area to 0.006 ha. In addition to design mitigation measures, the following actions will be undertaken during and following the construction period:
- An authorised fauna spotter will supervise clearing, due to the potential for WRP to occur.
- Trees to be cleared will be clearly demarcated to avoid unnecessary or accidental vegetation impacts.
- A toolbox talk with the contractor will occur, communicating environmental management requirements.
- Excavated material will be tracked out to the road reserve, as opposed to creating a large soil stockpile within native vegetation.
- Machinery will be clean on entry.

Mitigation measures are proposed to ensure that residual impacts of clearing will not trigger variance:

- Revegetation will be captured in a Revegetation Management Plan (RMP), to be prepared for the project. The RMP will document a management framework to formally capture revegetation management commitments proposed by the City, tailored to the site. The objectives of the Plan will be to:
 - Revegetate the application area, establishing native vegetation to a condition capable of generating long-term environmental values, similar to those in adjacent Armstrong Reserve – to at least Good to Very Good condition.
 - Implement successful revegetation by controlling present and ongoing risks to the site.
 - Completion targets to aim for 10 years final completion.
 - Be prepared in-line with the Department of Water and Environment Regulation's (DWER) publication: *A guide to preparing revegetation plans for clearing permits* (DWER, 2018).
 - The RMP will recreate vegetation to a condition that supports the objectives of the plan. The reintroduction of native vegetation through revegetation will improve site stabilisation, general ecosystem functioning and fauna habitat value.
 - Cleared areas will be revegetated with suitable available species from the clearing list (SW Environmental 2025), including *Eucalyptus rudis* subsp. *cratyantha* (Priority 4).

Revegetation plant stock will be locally sourced where possible, comprising local, naturally occurring species.

- The application area will be included in the City’s weed management program. A weed management campaign would be conducted within the broader reserve to enhance the existing condition of the Reserve (PEC). The Armstrong Reserve site would not benefit from any revegetation, as it is already dense, with weed ingress being the most prevalent threat.

Preliminary assessment of clearing impacts against the 10 clearing principles

In assessing whether the project is likely to have a significant impact on the environment, the area under application (0.006 ha) was assessed against the ten clearing principles (EP Act 1986, Schedule 5). The project **may be at variance to Principles a, b, and e**, and is not at, or not likely to be at variance to the remaining Principles.

Due to the small scale of the clearing area (0.006 ha), and the proposed RMP (providing a guideline for the reinstatement of vegetation to the same or better condition, with weed control implemented on-site and through the broader Armstrong Reserve), **formal offsets are not proposed**.

Table 1 Preliminary assessment against the 10 clearing principles

Clearing principle	Preliminary Assessment	Variance
(a) Native vegetation should not be cleared if it comprises a high level of biological diversity.	<p>The vegetation within the clearing area is in a Very Good vegetation condition (Keighery, 1994). Vegetation structure was intact, with one vegetation unit identified within the proposed clearing area: Marri, Swamp Paperbark and Flooded Gum open forest. The vegetation is mapped within the Native Vegetation Extent dataset (Landgate, 2025) (DPIRD-005).</p> <p>The DBCA database indicates that four state listed Priority Ecological Communities (PECs) (DBCA, 2025a) occur within 5 km, with one recorded within the application area: Dunsborough Forest Swamp (BCA Priority 1). This is an existing occurrence (DBCA, 2025a), with the entirety of Armstrong Reserve mapped as being this community. SW Environmental (2025) ground-truthed the vegetation present and confirmed it to be representative of this PEC.</p> <p>Eleven Priority flora species occur within 5 km of the project (DBCA, 2025b). SW Environmental (2025) identified three plants of <i>Eucalyptus rudis</i> subsp. <i>cratyantha</i> (Priority 4) occurring within or at the edge of the Survey Area. This species was readily identified at the time of the survey. It is unlikely that additional unmapped individuals would occur within or immediately adjacent to the application area. These are included in the application in case they are impacted.</p> <p>SW Environmental (2025) identified numerous fauna species that may utilise the site periodically, or as part of a larger patch. The habitat under application forms such a small potential habitat component, that impacts will negligible. Priority fauna that may utilise the clearing area include:</p> <ul style="list-style-type: none"> • <i>Isoodon fusciventer</i> (Southern Brown Bandicoot) – Priority 4 • <i>Phascogale tapoatafa wambenger</i> (Southern Brush-tailed Phascogale) – Conservation Dependent • <i>Ctenotus ora</i> (Coastal Plains Skink) – Priority 3 <p>The impact areas align with known suitable habitat for the Coastal Plains Skink, which has been previously recorded in Armstrong Reserve. While the proposed clearing could marginally affect suitable</p>	May be at variance

	<p>habitat for this species, it would not disrupt habitat linkages, and the dense microhabitat within the footprints is less optimal than preferred open areas.</p> <p>Southern Brown Bandicoot (SBB) and Southern Brush-tailed Phascogale (SBP) may use the application area as a very small component of broader habitat available throughout Armstrong reserve.</p> <p>Due to the small scale of clearing, lack of hollow bearing trees and prevalence of available habitat within the adjacent reserve, the impacts to SBB, SBP, and any additional fauna are considered negligible. The direct impact to wildlife will be managed by the presence of a fauna spotter, and habitat will be reinstated through the application of the RMP.</p> <p>The proposed clearing may to be at variance to this principle</p>	
<p>(b) Native 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.</p>	<p>Desktop fauna searches identified occurrences of 255 terrestrial vertebrate species, with 48 target taxa with the potential to occur locally. Habitat quality was assessed as being of moderate to high within Armstrong Reserve. No trees that were hollow-bearing or of a diameter at breast height greater than 50 cm were recorded in the area under application.</p> <p>SW Environmental (2025) identified that the application area may provide suitable habitat for the following threatened fauna:</p> <ul style="list-style-type: none"> • <i>Calyptorhynchus banksia</i> subsp. <i>naso</i> (Forest Red-tailed Black Cockatoo) – Vulnerable • <i>Pseudocheirus occidentalis</i> (Western Ringtail Possum) (WRP) Critically Endangered • <i>Zanda baudinii</i> (Baudin’s Black Cockatoo) – Endangered • <i>Zanda latirostris</i> (Carnaby’s Black Cockatoo) – Endangered <p>WRP was the only species recorded on site, with scats and an active drey recorded within the impact area. No individuals were observed.</p> <p>No evidence of black cockatoo foraging, roosting or breeding was observed within the application area. No clearing of large trees (Diameter at Breast Height (DBH) >50 cm) or hollow bearing trees is proposed. Due to the small scale of the clearing envelope and the presence of continued, adjacent high-quality foraging habitat, the proposed clearing will not significantly impact black cockatoos.</p> <p>The proposed clearing involves disturbance footprint of a small scale. The clearing is unlikely to result in significant impacts on local fauna values.</p> <p>Impacts to WRP are most likely to be associated with direct actions, such as killing individuals during construction if they were to occur within the clearing area. Indirect impacts such as habitat loss at this site are less likely to significantly effect WRP. An authorised fauna spotter will supervise clearing to mitigate the direct impacts to fauna that may be present.</p> <p>The proposed clearing may to be at variance to this principle.</p>	<p>May be at variance</p>
<p>(c) Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, rare flora.</p>	<p>Results from the DBCA database searches identified nine Threatened flora taxa with records occurring within 5 kms of the project (DBCA, 2025b). One record of Threatened <i>Caladenia viridescens</i> occurs within Armstrong Reserve, located approximately 30 m west of the northern pipeline section clearing area.</p> <p>Most conservation significant flora taxa with habitat preferences suited to the site would have been identifiable during the SW Environmental</p>	<p>Not at variance</p>

	<p>(2025) survey. The species most likely to remain undetected is <i>Caladenia viridescens</i>, due to its known variable flowering periods and potential for non-emergent or non-flowering individuals resulting from seasonal conditions or other disturbances. Previous surveys for this species have been undertaken across the reserve, and recorded plants approximately 30 metres from the proposed clearing. The SW Environmental (2025) spring flora survey did not identify any threatened flora occurring within or in close proximity to the area under application. Whilst numerous common <i>Caladenia</i> plants were observed through the adjacent Armstrong Reserve, none were within the area associated with the drain and road which is proposed to be cleared. SW Environmental (2025) concluded it to be unlikely that any further threatened flora were left undetected or impacted.</p> <p>The proposed clearing is not at variance with this principle.</p>	
<p>(d) Native 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.</p>	<p>An interrogation of the DBCA database identified three Threatened Ecological Communities (TEC) as occurring within 5 km of the clearing area (DBCA, 2025a):</p> <ul style="list-style-type: none"> • <i>Calothamnus graniticus</i> subsp. <i>graniticus</i> heaths on south-west coastal granites – Vulnerable (BC Act) • <i>Corymbia calophylla</i> — <i>Eucalyptus marginata</i> woodlands on sandy clay soils of the southern Swan Coastal Plain (floristic community type 3b as originally described in Gibson et al. 1994) – Endangered (BC Act) • Dense shrublands on clay flats (floristic community type 9 as originally described in Gibson et al. 1994) (synonymous with subtypes of Claypans of the Swan Coastal Plain EPBC-listed TEC) – Endangered (BC Act) <p>No TECs were previously mapped or recorded at the site.</p> <p>The proposed clearing is not at variance to this clearing principle.</p>	Not at variance
<p>(e) Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.</p>	<p>The Survey Area occurs within remnant vegetation mapped as part of Southwest Swan Coastal Plain regional vegetation mapping as the Abba Complex (DBCA, 2018). The Abba Complex consists of:</p> <ul style="list-style-type: none"> • A mixture of open forest of <i>Corymbia calophylla</i> (Marri) - <i>Eucalyptus marginata</i> (Jarrah) - <i>Banksia</i> species and woodland of <i>Corymbia calophylla</i> (Marri) with minor occurrences of <i>Corymbia haematoxylon</i> (Mountain Marri). Woodland of <i>Eucalyptus rudis</i> (Flooded Gum) - <i>Melaleuca</i> species along creeks and on flood plains. <p>Only 6.64 % of vegetation mapped as the Abba Complex remains within the City of Busselton Local Government Area (DBCA, 2019). The Abba Complex falls below the statewide retention target of preventing ecological communities from being cleared to levels below 30 % of their pre-European extent (DCCEEW, 2024). Of its total statewide pre-European extent, less than 7 % of the complex remains, demonstrating that the complex has been subject to extensive clearing disturbances. Vegetation at the site is in Good to Very good vegetation condition.</p> <p>The proposal may be at variance to this Principle.</p>	May be at variance
<p>(f) Native vegetation should not be cleared if it is growing in, or in association with, an environment</p>	<p>The application area does not intersect any natural drainage lines or mapped geomorphic wetlands, nor will it impact any native wetland vegetation. The clearing proposed is not considered likely to cause any deterioration of surface or underground water but will reinstate</p>	Not at variance

<p>associated with a watercourse or wetland.</p>	<p>previous drainage regimes through replacing the stormwater drain and stop the current erosion that is currently taking place.</p> <p>The proposed clearing is not at variance to this principle.</p>	
<p>(g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.</p>	<p>The minor clearing associated with the replacement of the failed stormwater drain within Armstrong Reserve will not cause land degradation. It will however improve the current erosion and turbid runoff that is currently taking place because of the failed pipes and prevent possible future erosion by moving the pipeline out of the vegetated area.</p> <p>Acid Sulfate Soils (ASS) occur in low-lying coastal areas and are common in water-logged, groundwater-dependant and high-groundwater-table environments. The project area occurs in Risk Class 2 (2i, p3) mapped area, with a moderate to low risk of ASS occurring (DWER, 2017). Impacts to ASS will be low due to low volumes of excavation and these areas being filled, with no dewatering proposed.</p> <p>Contractors will ensure their equipment is clean before entering the site and wash down as required to minimize the spread of weeds, dieback (<i>Phytophthora cinnamomi</i>) or other pathogens if present.</p> <p>The proposed clearing is not at variance to this principle.</p>	<p>Not at variance</p>
<p>(h) Native 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.</p>	<p>The project will not impact on any nearby conservation areas. Armstrong Reserve (25229) in which the clearing application areas occur, a 'C' class bushland reserve vested with the City of Busselton for the purpose of 'Recreation', supports remnant bush. The nearest other local government reserves with high conservation value (though not Conservation zoned) are Marri Reserve (Class C) 250 m west and the Centennial Park and foreshore reserves approximately 200m east. The nearest terrestrial DBCA land is the Leeuwin Naturaliste National Park over 5 km west.</p> <p>The proposed clearing will not impact these areas or disrupt any associated environmental values.</p> <p>The proposed clearing is not at variance to this principle.</p>	<p>Not at variance</p>
<p>(i) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.</p>	<p>The minor clearing associated with the replacement of the failed stormwater pipe within Armstrong Reserve will not cause any deterioration of surface or underground water. It will stop the current erosion and turbid runoff that is currently taking place.</p> <p>Existing drainage will be maintained through the project design and in line with local government road construction standards.</p> <p>The proposed clearing is not at variance to this principle.</p>	<p>Not at variance</p>
<p>(j) Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.</p>	<p>The minor clearing associated with the replacement of the failed section of stormwater drain within Armstrong Reserve will not increase the risk of flooding. Failure to repair the drains however may result in flooding of upstream areas.</p> <p>The proposed clearing is not at variance to this principle.</p>	<p>Not at variance</p>

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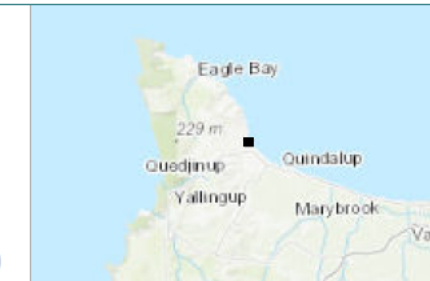
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ATTACHMENT 2: PROPOSED CLEARING

GIFFORD ROAD (0.64 SLK), DUNSBOROUGH

- Proposed clearing area
- Road
- Armstrong Reserve
- Failed stormwater drain



A3 @ 1:750

