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8 May 2026

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

Dear Sir/Madam,

CLEARING PERMIT APPLICATION FOR VEGETATION REMOVAL TO SUPPORT ROAD UPGRADES AND TURBINE EQUIPMENT TRANSPORT ASSOCIATED WITH THE DEVELOPMENT OF PARRON WIND FARM

Regarding the letter's content outlined below, the following key terms are relevant in relation to this clearing application:

- **Site** - the area within which all proposed road upgrades and vegetation clearing/trimming will occur. The site covers an area of approximately 0.73 hectares (ha).
- **Survey area** – the area surveyed to identify environmental values and inform the design and layout of the road upgrades at the Cowalla Road and Brand Highway intersection. These surveys also covered the nearby Parron Wind farm. 3.07 ha of the survey area relates specifically to this clearing permit application.
- **Application area** – the area of native vegetation proposed to be cleared, forming the subject of this clearing permit application. The application area includes areas of both complete clearing and significant trimming where trunks or stems may be severed, consistent with the definition of clearing under the *Environmental Protection Act 1986* (EP Act). Up to 0.49 ha of native vegetation is proposed to be cleared or trimmed to facilitate road upgrades and turbine equipment transport, as shown in **Figure 1** and **Appendix A**.

This letter provides supporting information to be read in conjunction with the clearing permit application form and the following attachments.

- **Appendix A** – *Brand Hwy-Cowalla intersection proposed site clearing layout plan*
- **Appendix B** – *Main Roads Western Australia Authorisation for the Application of a Clearing Permit*
- **Appendix C** – *Detailed Flora and Vegetation Assessment*
- **Appendix D** – *Basic Fauna and Targeted Bird and Bat Assessment*
- 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 INTRODUCTION

Emerge Associates (Emerge) were engaged by Zephyr Energy Pty Ltd (the applicant) to support the preparation of a clearing permit application, including flora, vegetation and fauna assessments, for the

proposed intersection upgrades required to facilitate the transport of turbine components and provide safe access to the Parron Wind Farm.

The proposed upgrades are located approximately 5.5 kilometres (km) north northwest of Badgingarra, Western Australia, at the intersection of Cowalla Road and Brand Highway (the site). The site covers an area of approximately 0.73 ha and is approximately 4.7 km east of the Parron Wind Farm (refer to **Figure 1**).

The site is generally surrounded by Twyata Nature reserve to the east, agricultural land to the west, Brand Highway road reserve to the north and south, with Brand Highway intersecting the site. Badgingarra National Park also occurs to the southwest of the site.

The proposed development involves road widening and modification of existing vegetation to enable the safe transport of large equipment associated with construction of the Parron Wind Farm. A left-hand turning lane from Brand Highway onto Cowalla Road will also be constructed to provide safe access to Cowalla Road for workforce and other vehicles travelling from the proposed accommodation site in the Badgingarra townsite to the Parron Wind Farm.

The Parron Wind Farm development will contribute to Western Australia's transition to a greater use of renewables, whilst providing the transmission of reliable and affordable energy to the South-West Interconnected System (SWIS). The project aligns with both State and Federal Government objectives for sustainable production of energy and commitments to reduce greenhouse gas emissions.

To enable transport and site access, small areas of native vegetation will need to be removed or trimmed at the Cowalla Road and Brand Highway intersections, within road reserves. Authorisation from Main Roads Western Australia (MRWA) has been obtained to complete these works, with a supporting letter provided in **Appendix B**. This clearing permit application covers areas proposed for both clearing and trimming, including locations where trimming may disturb surrounding vegetation or sever trunks or stems, consistent with the definition of clearing under the *Environmental Protection Act 1986* (EP Act).

The application area includes 0.42 ha of intact vegetation that will require clearing, of this 0.09 ha will be permanently cleared and support the installation of hardstand and pavement with the remaining 0.33 ha temporarily cleared for construction and allowed to revegetate following the completion of construction and haulage activities. A further 0.07 ha has been conservatively estimated to allow for vegetation trimming, which also includes anticipated minor disturbance around the trees requiring trimming to ensure safe access. **Figure 2** and **Appendix A** identifies the areas proposed for clearing and those subject to trimming and incidental disturbance within the application area. Vegetation within trimming areas will be retained as far as reasonably practicable.

A summary of the clearing area values is shown below in **Table 1**.

Table 1: Clearing permit application area summary and values

Vegetation value	Application area
Clearing footprint	Up to 0.49 ha
ESA (yes/no)	No
TECs and PECs	N/A
Black cockatoo foraging habitat (ha)	Up to 0.49 ha
Black cockatoo potential breeding trees (number)	None

2 BACKGROUND

The applicant is seeking a clearing permit to remove native vegetation in 'very good' to 'good-degraded' condition from the Cowalla Road and Brand Highway intersection to allow for transport of equipment and safe access into the Parron Wind Farm site.

The proposed clearing will be undertaken within the following lots:

- Lot 4296 'good - degraded' to 'very good' vegetation within the Brand Highway road reserve
- Lot 4280 'good' vegetation within the Cowalla Road road reserve

Clearing within the Parron Wind Farm development site itself (Lots 3738, 3739, 3742, 3743 and 3744) involves the removal of 2.6 ha of native vegetation in 'degraded' to 'completely degraded' condition to accommodate the installation of WTG hardstands and ancillary infrastructure.

Following consultation with the Department of Water and Environmental Regulation's (DWER) Native Vegetation Regulation branch, the potential application of clearing exemptions was considered. Based on DWER's definition of structure, the applicant has determined that the clearing required for the development of the Parron Wind Farm meets this definition and is therefore exempt from the requirement to obtain a clearing permit. A clearing permit application has not been prepared for this component of the project.

Notwithstanding the above, the applicant has designed the proposed wind farm layout and associated construction methods with full consideration of the site's environmental values. A comprehensive understanding of the site's flora, vegetation, fauna, wetlands, surface water, groundwater, and surrounding land uses has been developed to ensure that design decisions are informed, and that no previously unidentified environmental values are at risk of impact.

3 SUMMARY OF ENVIRONMENTAL CONDITIONS

3.1 Clearing application area

The native vegetation to be cleared is up to 0.49 ha, the breakdown of this area into permanent clearing, temporary construction clearing and vegetation trimming can be seen in **Table 2** below. The location and extent of the site and application area is shown in **Figure 2**.

Table 2: Clearing Areas and future uses

Clearing Area	Area (ha)	Future use
Permanent clearing	0.09	Pavement or hardstand associated with road widening, turning lane and road shoulder
Temporary construction clearing	0.33	Rehabilitated native vegetation
Vegetation trimming (at height of 3.5m)	0.07	Rehabilitated native vegetation

3.2 Historical clearing

A review of historical images available from 2000 onwards show that a portion of the site was cleared of native vegetation prior to 2000, for the construction of Brand Highway and Cowalla Road as well as a cross over on Cowalla Road. **Plate 1** below shows the aerial imagery taken across the site in 2000. Since this time the extent of native vegetation within the road reserve and adjacent Twyata Nature Reserve has remained relatively stable (Landgate 2026). Aerial imagery shows that the surrounding area comprises predominantly agricultural land use, with land subject to extensive clearing prior to 2000.

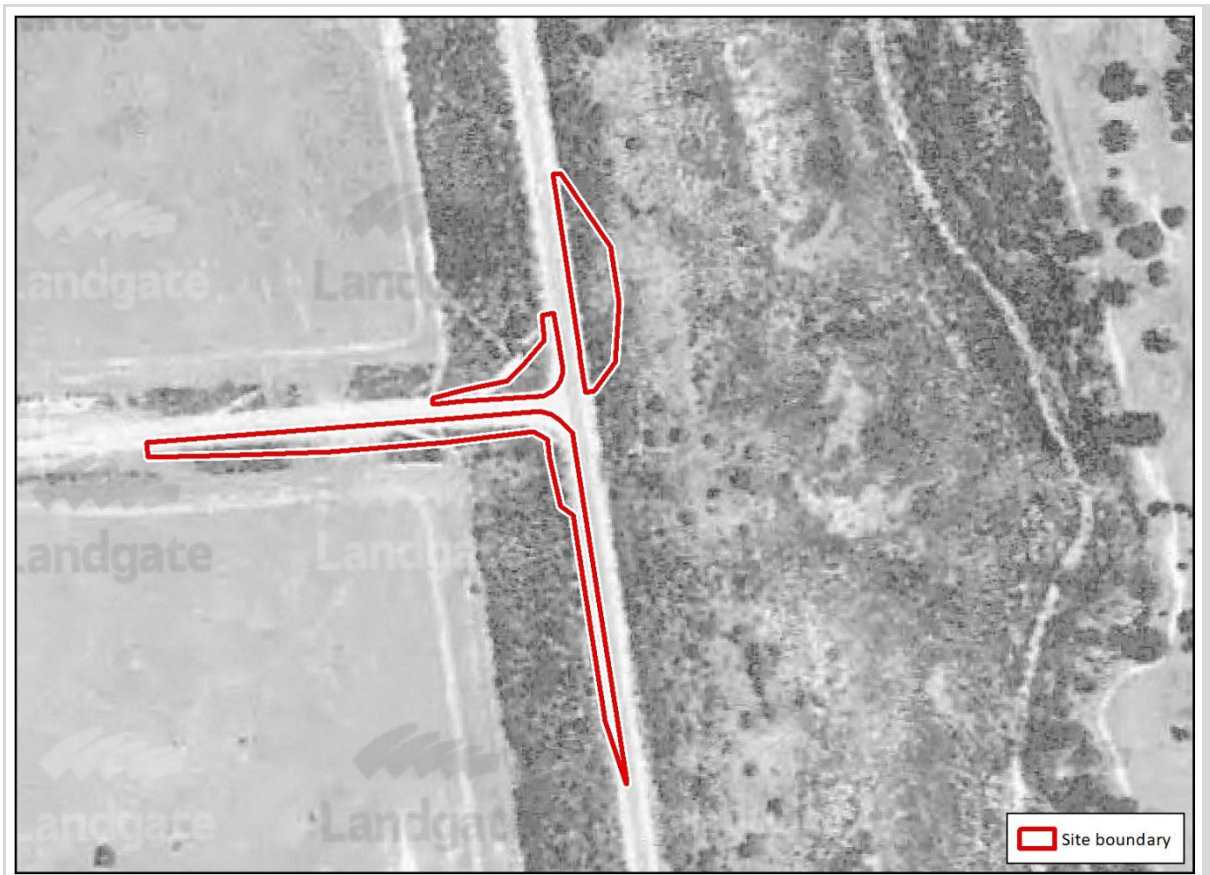


Plate 1: Historic aerial of the site taken in 2000 (Landgate 2026)

3.3 Soils and Landforms

The site occurs on the Geraldton Sandplains in the Lesueur Sandplain subregion, which is the geomorphic unit that characterises the region from Dongara in the north, to Greenhead in the south and inland to Badgingarra.

Fine scale soil landscape mapping by DPIRD (2022) shows two (2) units as occurring within the site. The site is not known to contain any restricted landforms or unique geological features. The most abundant system covering the majority of the site is the Yerramullah 3 Subsystem. This comprises colluvial slopes and some plateau remnants, very gently to gently inclined hillslopes and sand filled minor valleys; pale and yellow deep sands, pale sandy gravels, shallow gravel over duricrust, some sandy duplexes and sandy earths.

3.4 Acid Sulfate Soils

No ASS risk mapping exists for much of the Wheatbelt region, including the site. Generally, if ASS are present within a site, these would occur beneath the lowest seasonal groundwater levels, and risks only posed when activities are proposed to extend below the groundwater levels, through either deep excavation or dewatering.

No dewatering or excavation below groundwater is expected during intersection upgrade works, and therefore the potential risk of ASS is very low.

3.5 Flora and vegetation values

3.5.1 Regional values

The site is contained within the Geraldton Sandplains Biogeographic Regionalisation for Australia (IBRA) region (previously 'Northern Sandplains' region) of Western Australia. The region is described as comprising mainly 'scrub heath on sandplain near the coast, *Acacia* to *Casuarina* thickets further

inland and *Acacia* scrub with scattered trees of *Eucalyptus loxophleba* on hardsetting loams' (Beard 1990).

Variations in native vegetation can be further classified based on regional vegetation mapping. Beard *et al.* (2013) mapping shows the majority of the site as comprising vegetation association 'Le Sueur_7' which is described as 'woodland'. A small portion in the western most portion of the site is mapped as comprising the 'Le Sueur_1031' vegetation association which is described as 'scrub-heath or heath' (Beard *et al.* 2013).

The 'Le Sueur_7' association was determined to have 33.63% of its pre-European extent remaining in the Geraldton Sandplains region in 2019, with 3.1% protected for conservation purposes. The 'Le Sueur_1031' association was determined to have 32.67% of its pre-European extent remaining in the Geraldton Sandplains region in 2019, with 12.35% protected for conservation purposes (Government of Western Australia 2019).

3.5.2 Local values

Emerge Associates (2026b) have undertaken ecological surveys throughout the survey area including surveying plant communities and vegetation condition (**Appendix C**).

One plant community was identified throughout the site ranging from 'very good' to 'good- degraded' condition. The plant community and vegetation condition are shown in **Figure 3** and **Figure 4**, respectively. The data presented in **Table 3** is specific to the native vegetation values that were identified within the application area.

A portion of the site comprises **predominantly non-native vegetation** in 'completely degraded' condition (0.24 ha, 33%), which includes heavily disturbed areas on road shoulders, as well as Brand Highway and Cowalla Road themselves.

Table 3: Vegetation values identified within the application area

Plant community and description	Vegetation condition	Clearing area (ha)
EtBaBmBc: Low open woodland <i>Eucalyptus todtiana</i> , <i>Banksia attenuata</i> , <i>Banksia menziesii</i> , <i>Banksia candolleana</i> and occasional <i>Banksia prionotes</i> and/or <i>Hakea obliqua</i> over open shrubland <i>Apectospermum spinescens</i> , <i>Adenanthos cygnorum</i> subsp. <i>cygnorum</i> , <i>Allocasuarina humilis</i> and <i>Callitris acuminata</i> over low shrubland <i>Eremaea</i> spp., <i>Hypocalymma xanthopetalum</i> , <i>Hibbertia hypericoides</i> , <i>Stirlingia latifolia</i> and <i>Conospermum</i> spp. over forb/rushland <i>Alexgeorgea subterranea</i> , <i>Alexgeorgea nitens</i> , <i>Chordifex sinuosus</i> , <i>Chordifex microdon</i> , <i>Mesomelaena pseudostygia</i> and <i>Lomandra</i> spp. over mixed native herbs and occasional weeds on sandy soils/sandplains.	'very good' to 'good - degraded'	0.49 ha

3.6 Threatened and priority flora

Emerge Associates (2026b) recorded 478 native and 25 non-native flora species during field surveys throughout the broader survey area (including the nearby Parron Wind Farm site). While no threatened species were identified, 23 priority flora species were recorded within intact native vegetation areas, one of which was recorded in the site (*Hensmania stoniella* (P3)) as shown in **Figure 5**. The priority flora record occurs within the vegetation trimming area and as such will not be impacted as it falls well below the 3m trimming height. Emerge Associates (2026b) concluded that there were an additional 13 threatened and 84 priority flora species that may occur within various intact native vegetation areas within the survey area (inclusive of the broader Parron wind farm site). The site was traversed on foot by two senior ecologists on 3 November 2023 and the presence of one priority species was recorded. This survey effort is considered sufficient to discount the presence of other threatened and priority flora within the site.

3.7 Threatened and priority ecological communities

All threatened ecological communities (TECs) and priority ecological communities (PECs) identified from database searches were confirmed from the field survey as having a 'nil' likelihood of occurrence within the site, meaning that the field survey confirmed no TECs or PECs occur within the site.

3.8 Fauna habitat

Emerge Associates (2026a) undertook a fauna assessment (**Appendix D**) which included opportunistic fauna observations and an evaluation of fauna habitats to assess their suitability for supporting threatened, specially protected, and priority fauna.

The broader survey area was found to consist of 10 broad habitat types, however only one habitat type (sandplain) was found to occur within the site. The site comprises 0.49 ha of sandplain habitat, further described in **Table 4** and shown in **Figure 6**. This habitat type was assessed as having high habitat value due to its low level of disturbance, subsequently supporting the highest diversity of reptile and bird species recorded across the survey area.

Table 4: Fauna habitats within the site

Fauna habitat	Description	Total area within site (ha)	Representative photograph
Sandplain	Open <i>Eucalyptus</i> spp. and <i>Proteaceae</i> woodland over native shrubs on sandy soils. • High microhabitat complexity (woody debris, burrows, runnels, fallen logs, leaf litter) • Denser areas may provide habitat for larger mammals and a wide assemblage of common and rarer avifauna as well as reptiles. • Largest areas of habitat fenced from livestock.	0.49 ha	

3.9 Threatened and priority fauna

Based on the outcomes of the likelihood of occurrence assessment completed by Emerge Associates (2026a), one threatened, two specially protected, and four priority species were classified as having a 'high' or 'moderate' likelihood of occurrence (**Table 5**).

Table 5: Conservation significant fauna species found to occur or are likely to occur within the survey area

Species name	Common name	Status		Habitat description	Likelihood of occurrence
		WA	EPBC Act		
Birds					
<i>Apus pacificus</i>	Fork-tailed swift	MI	MI	Aerial, migratory species that is most often seen over inland plains and sometimes above open areas, foothills or in coastal areas. Sometimes occurs over settled areas, including towns, urban areas and cities	Moderate
<i>Falco peregrinus</i>	Peregrine falcon	OS	-	Mainly found around cliffs along coasts, rivers, ranges and around wooded watercourses and lakes	Moderate

Table 5: Conservation significant fauna species found to occur or are likely to occur within the survey area (continued)

Species name	Common name	Status		Habitat description	Likelihood of occurrence
		WA	EPBC Act		
Birds					
<i>Zanda latirostris</i>	Carnaby's cockatoo	EN	EN	Mainly proteaceous scrubs and heaths and adjacent eucalypt woodlands and forests; also plantations of <i>Pinus</i> spp. Attracted to seeding <i>Banksia</i> spp., <i>Dryandra</i> spp., <i>Hakea</i> spp., <i>Eucalyptus</i> spp., <i>Corymbia calophylla</i> , <i>Grevillea</i> spp., and <i>Allocasuarina</i> spp.	High
Invertebrates					
<i>Hylaeus globuliferus</i>	Woollybush bee	P3	-	Males are territorial and may be found perched on the growing tips of <i>Adenanthos</i> sp., <i>Banksia</i> sp. or <i>Jacksonia</i> sp. Has also been recorded visiting the flowers of <i>Grevillea</i> sp.	Moderate
<i>Idiosoma gardneri</i>	Mt Lesueur shield-backed trapdoor spider	P2	-	Only one recorded specimen. Found in Lesueur National Park, likely has similar biology to <i>Idiosoma sigillatum</i> .	Moderate
Mammals					
<i>Notamacropus irma</i>	Western brush wallaby	P4	-	Dry sclerophyll forest, <i>Banksia</i> spp. woodlands and shrublands, typically favouring dense low vegetation that provides dense cover.	Moderate
Reptiles					
<i>Neelaps calonotos</i>	Black-striped snake	P3	-	Coastal and near-coastal dunes, sandplains supporting heathlands and <i>Banksia</i> spp. woodlands.	Moderate

Neither the fork-tailed swift nor the peregrine falcon would breed within the survey area, and any occurrence of these species would be in the air space, largely independent of terrestrial habitat.

Although not recorded during the survey, the woollybush bee, Mt Lesueur shield-backed trapdoor spider, western brush wallaby, and black-striped snake are considered to have a high or moderate likelihood of occurrence within the survey area. The sandplain habitat within the site is considered to provide suitable habitat for these species.

Foraging evidence of Carnaby's cockatoo, including chewed plant fruits/seeds, was observed in the sandplain habitat within the survey area during the Emerge Associates (2026a) survey, with historic records of the species occurring in surrounding areas (DBCA 2023). The site is located within the northern part of the Carnaby's cockatoo modelled distribution and breeding range which spans to Eneabba, approximately 40 km north of the site (DoEE 2016). The site is located outside of the modelled distribution range of Baudin's cockatoo and forest red-tailed cockatoo (DoEE 2016) and so these species are not considered likely to occur and have not been discussed further.

A total of 0.49 ha of foraging habitat for Carnaby's cockatoo was recorded within the site, all of which is categorized as primary native foraging habitat. The extent of foraging habitat by value category is detailed in **Table 6** and shown in **Figure 7**. Primary native habitat is the highest value foraging habitat. The site is also located near Badgingarra National Park (DBCA 2023), which offers extensive habitat for the species.

There is no suitable breeding or roosting habitat within the site Emerge Associates (2026a).

Table 6: Foraging habitat recorded within the site

Foraging habitat	Foraging habitat for Carnaby's cockatoos (ha)
Primary native	0.49
Primary non-native	0
Secondary native	0
Secondary non-native	0
Total	0.49

3.10 Wetlands

Wetlands of national or international significance may be afforded special protection under Commonwealth or international agreements. Review of the *Ramsar List of Wetlands of International Importance* (DBCA 2017) and *A Directory of Important Wetlands in Australia – Western Australia* (DBCA 2018) indicates that no Ramsar or listed 'important wetlands' are located within or near the site.

The DWER hydrography linear dataset (DWER 2018) indicates that no wetlands or water related features occur within the site.

A review of the *Geomorphic Wetlands, Cervantes Eneabba* dataset indicates that no geomorphic wetlands occur within or in the immediate vicinity of the site. One paluslope wetland feature (Unique Feature Identifier (UFI) 245) occurs approximately 275 m east of the site (DBCA 2024).

3.11 Hydrology

The DWER Water Register (DWER 2021) indicates the site falls within the Jurien Groundwater Area and the Badgingarra Groundwater Subarea. The site is underlain by a multilayer aquifer system comprised of the 'Perth – Superficial' aquifer and the 'Perth – Yarragadee North' aquifer. The Yarragadee aquifer is a major freshwater resource in the Badgingarra Groundwater Subarea which is capable of supplying bore yields of >5000 kL/day.

The Jurien Groundwater Area is an area proclaimed for licensing under the *Rights in Water and Irrigation Act 1914* (RIWI Act), which thereby requires that a 5C licence is obtained to abstract water for construction purposes. The 5C groundwater licence allows the licence holder to take a specified amount of water from the proclaimed area, water that may be transferred to another user, traded or leased, subject to approval. The 5C groundwater licence would be considered a temporary groundwater usage, which includes any activity with a set timeframe associated with the activity.

There are no groundwater bores/wells located within the site, and no groundwater levels are available for the site.

The site is within the Hill River Catchment area. The Hill River, a major tributary, passes approximately 200 m to the east of the site, before continuing north westward to the north of the site. No major or minor tributaries intersect the site.

The Hill River and tributaries catchment, as mapped by the DWER, is gazetted as a Proclaimed Surface Water Area allowing for the commercial use of water under a license as set out in the RIWI Act. The RIWI Act's purpose is to regulate the taking of water from watercourses and wetlands.

3.12 Aboriginal heritage

Noongar people are the Traditional Owners of the south-west of Western Australia, which incorporates the site. The proposed development occurs across the South West Settlement Native Title, and within the Yued region.

In accordance with the *Aboriginal Heritage Due Diligence Guidelines* (DAA 2013), a search of the AHIS online database (DPLH 2023) was undertaken which did not identify any Registered Aboriginal Heritage Sites or Other Heritage Places within the site.

The closest Registered Aboriginal Cultural Heritage Place in proximity to the site is JB1 SITE (Place 17118), which is approximately 700 m to the north near the Brand Highway. This ACH place is not culturally sensitive and is classified as a Camp.

Ongoing pre-construction heritage investigations are being undertaken in collaboration with the Yued Aboriginal Corporation.

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 the proposed clearing, in order to ensure the environmental impact was kept to a minimum.

4.1 Avoidance

As the required clearing is primarily driven by compliance with Main Road Western Australia (MRWA) standards and the engineering design of the upgraded intersection, opportunities to avoid clearing are limited. Nonetheless, avoidance has been a key consideration throughout the design process. The application area has been refined to ensure that clearing is limited to the minimum area necessary to accommodate safe vehicle movements, turbine component transport, and construction requirements. Where possible, vegetation has been retained within blade over sail areas, with trimming only required for those trees that have the potential to obstruct transport vehicles (greater than 3.5 m in height).

It is important to note that the application area subject to trimming reflects a conservative estimate of potential impacts, and avoidance will be prioritised throughout all trimming works. Only clearing essential for road widening, intersection upgrades, and safe turbine transport will be completed, while native vegetation in trimming zones will be retained wherever reasonably practicable. Trimming will be limited to trees over 3.5 m in height that may interfere with transport, with trimming works managed to confine any incidental disturbance to the immediate vicinity.

Reducing vegetation height to below 3.5 m will prevent uncontrolled damage to vegetation that could otherwise occur during transport, impacting tree health and structural integrity. Trimming is expected to allow trees to regrow following completion of haulage activities, and any areas subject to incidental disturbance necessary to provide safe access for trimming are anticipated to naturally regenerate.

To support the avoidance process, detailed swept path analysis has been undertaken to accurately determine the minimum space required for vehicle manoeuvring and component transport. Swept path analysis models the movement envelope of oversize vehicles as they travel along the nominated transport route, enabling precise identification of vegetation that must be cleared for safe passage. This ensures that clearing is restricted to only what is essential, and that any unnecessary removal of native vegetation beyond safety and design requirements is avoided.

In summary, avoidance has been demonstrated through the following measures:

- Limiting clearing to the minimum area required for road widening, intersection upgrades, and safe transport of turbine components.
- Retaining native vegetation wherever practicable within trimming zones.
- Restricting trimming to trees over 3.5 m that may interfere with transport, thereby protecting tree health and structural integrity.
- Incorporating buffers around trees requiring trimming to confine incidental disturbance to the immediate vicinity.

4.2 Mitigation

Where avoidance is not possible, mitigation measures will be implemented to reduce the intensity and/or extent of the impact.

Mitigation measures for flora, vegetation and fauna to be implemented as part of construction within the site have been outlined in the *Environmental Assessment and Management Plan* (EAMP) (Emerge Associates 2026e) which includes (but is not limited to):

- The preparation of and implementation of a *Construction Environmental Management Plan* (CEMP)
- Utilising existing roads to prevent additional vegetation disturbance
- Identification of tree/vegetation retention areas on engineering drawings and delineation of tree protection zones (TPZ). These will be identified as 'no go zones'. No access, clearing, or storage of machinery or equipment will be permitted within TPZs.
- Implementation of hygiene protocols during the clearing and construction process to minimise introduction/spread of weeds and plant pathogens. 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.

These mitigation measures are designed to complement avoidance strategies and ensure that, where clearing or trimming is necessary, environmental impacts are minimised and retained vegetation is protected to the greatest extent practicable.

4.3 Rehabilitation

Natural regeneration will commence within areas of the site where permanent pavements or hardstand have not been installed following completion of construction and haulage activities (0.40 ha). Trees that have been trimmed and are still viable will regrow. Where topsoil is removed and stockpiled during clearing this be reinstated across temporary construction clearing areas with the seedbank supporting regeneration. It is anticipated that native vegetation surrounding the cleared area will also allow the regeneration to occur.

Rehabilitation has been detailed in the Parron Wind Farm Decommissioning and Land Rehabilitation Management Plan (Emerge Associates 2026c).

4.4 Offset

The assessment of residual impacts, following application of the mitigation hierarchy, has indicated whilst some impacts are expected as a result of the proposed development, these can be managed and there is no significant residual impact predicted. Accordingly, no offsets have been proposed.

5 PLANNING INSTRUMENTS AND OTHER ENVIRONMENTAL APPROVALS

5.1 Planning approval

A development application has been lodged with the Shire of Dandaragan for the Parron Wind Farm, and development approval issued. The development application was supported by several technical studies, investigations and management plans including an *Environmental Assessment and Management Plan*, (Emerge Associates 2026e) *Fauna Management Plan* (Emerge Associates 2026d) and *Decommissioning and Land Rehabilitation Management Plan* (Emerge Associates 2026c). While the main wind farm site is the main subject of the development application and associated management plans, the road upgrades at the intersection of Cowalla Road and Brand Highway have also been considered.

5.2 Environment Protection and Biodiversity Conservation Act 1999

The EPBC Act protects listed MNES, and it is an offence to implement any action that would have or is likely to have a significant impact on any MNES. If a proponent believes their proposed action (i.e. the proposal) is likely to have a significant impact on any MNES, then they are required to refer the proposal to the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

Although significant impacts to MNES were considered unlikely for the proposal, the broader Parron Wind Farm proposal, which included the road upgrade works at the intersection of Cowalla Road and Brand Highway, was referred pursuant to the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 27 November 2024 in order to confirm its status to enable the proposal to proceed with certainty (EPBC 2024/10062). DCCEEW determined that the proposed action is unlikely to have a significant impact on MNES. As such, the proposal was deemed 'not a controlled action' on 6 May 2025 and doesn't require further assessment or approval under the EPBC Act.

5.3 Environment Protection Act 1986

Part IV Section 38(1) of the Environmental Protection Act 1986 (EP Act) provides that, where a proposal is likely to have a significant effect on the environment, a proponent may refer the proposal to the Environmental Protection Authority (EPA) for a decision on whether or not it requires formal assessment under the EP Act.

Although significant impacts to EPA factors were considered unlikely for the proposal, the broader Parron Wind Farm proposal was also referred pursuant to the EP Act to provide certainty for the project to proceed. The EPA determined that the likely environmental effects of the proposal are not so significant or unmitigated to warrant formal assessment under Part IV of the EP Act. The decision to 'not assess' the proposal was provided by the EPA on 28 March 2025.

Under the EP Act it is an offence to clear native vegetation unless the clearing is done in accordance with a clearing permit, or an exemption applies. 'Native vegetation' is defined in section 3(1) and 51A of the EP Act and Regulations as follows:

Indigenous aquatic or terrestrial vegetation, that includes dead vegetation unless that dead vegetation is of a class declared by regulation to be excluded from this definition but does not include vegetation in a plantation.

Native vegetation does not include vegetation that was intentionally sown, planted or propagated (even if this involves indigenous terrestrial plant species), although natural regeneration of previously areas would constitute native vegetation. Clearing vegetation that is not native vegetation, for the purposes of the EP Act, can be cleared without requiring a clearing permit or exemption.

'Clearing' is defined under in section 51A of the EP Act as follows:

- a) *the killing or destruction of; or*
- b) *the removal of; or*
- c) *the severing or ring-barking of trunks or stems of; or*
- d) *the doing of any other substantial damage to,*

some or all of the native vegetation in an area, and includes the draining or flooding of land, the burning of vegetation, the grazing of stock, or any other act or activity, that causes —

- e) *the killing or destruction of; or*
- f) *the severing of trunks or stems of; or*
- g) *any other substantial damage to,*

some or all of the native vegetation in an area.

A native vegetation clearing permit pursuant to Part V of the EP Act will be required where relevant exemptions do not apply. While a relevant exemption exists for the clearing of 2.6 ha of native vegetation in 'degraded' to 'completely degraded' condition to enable the construction of the Parron Wind Farm, this exemption does not apply to the proposed intersection upgrades.

6 RESPONSE TO EP ACT CLEARING PRINCIPLES

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 matter under consideration.

In support of this clearing permit application, we have considered and responded to the ten clearing principles in the following sections.

Principle (a) – Native vegetation should not be cleared if it comprises a high level of biological diversity.

The site is not located within a biodiversity hotspot as identified by the Threatened Species Scientific Committee for the Australian Government.

All PECs identified from database searches and the Emerge Associates (2026b) field survey had a 'nil' likelihood of occurrence within the site, meaning that the field survey confirmed that they do not occur within the site. The Emerge Associates (2026b) assessment identified one priority flora species within the site but will be retained as it is in the vegetation trimming area and is not close to the 3.5m trimming height.

Due to the location of the proposed clearing being within the road reserve, high level of historical disturbance within the site and in the immediate vicinity (through agriculture and road construction), the clearing area does not support a high level of biological diversity, and therefore this principle is likely to be met.

Principle (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.

The fauna assessment undertaken by Emerge Associates (2026a) observed foraging evidence of Carnaby's black cockatoos within the broader survey area. Two specially protected and four priority species that were identified in the preliminary assessment are considered unlikely to occur due to a lack of suitable habitat for the species.

Sandplain habitat is within the area proposed for clearing. The remainder of the site consists of bare ground associated with roads and adjacent cleared areas which provide no value for native fauna.

Given the condition and structure of the native vegetation within the site, the vegetation is primarily used by widespread native and non-native fauna species with non-specific habitat requirements. Limited overstory vegetation exists, therefore there is no suitable roosting or breeding habitat suitable for black cockatoos.

The native vegetation within the application area contains 0.49 ha of primary native foraging habitat for Carnaby's black cockatoos as shown in **Figure 7**.

There are large areas of known Carnaby's black cockatoo foraging habitat surrounding the site associated with established conservation reserves, such as Twyata Nature reserve and Badgingarra National Park, that also support known roosting and breeding sites, and what would also be potential breeding and roosting habitat. These areas are expected to support Carnaby's black cockatoo activity and movements in the wider regional context.

In contrast to the wider local habitat context for Carnaby's cockatoo, the site supports limited areas of foraging habitat for Carnaby's black cockatoos.

It is highly unlikely that clearing associated with this application would result in significant impact to fauna habitat necessary for the maintenance of fauna indigenous to Western Australia, and therefore this principle is likely to be met.

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

Emerge Associates (2026b) identified no threatened species within the survey area, but one priority flora species (*Hensmania stoniella* (P3)) was recorded within the vegetation trimming area within the site as shown in **Figure 5** but will be retained as it is not greater than 3.5m tall.

Emerge Associates (2026b) concluded that there were an additional 13 threatened and 84 priority flora species that may occur within various intact native vegetation areas within the survey area (inclusive of the broader Parron wind farm site). The site was traversed on foot by two senior ecologists on 3 November 2023 and the presence of one priority species was recorded. This survey effort is considered sufficient to discount the presence of other threatened and priority flora within the site.

Emerge Associates (2026b) concluded that areas of vegetation in ‘good – degraded’ or better condition may provide potentially suitable habitat for threatened flora species. However, as the site had sufficient survey effort the presence of additional threatened or priority flora species is considered unlikely.

Principle (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.

All threatened ecological communities (TECs) identified from database searches were confirmed from the field survey as having a ‘nil’ likelihood of occurrence within the survey area, meaning that the field survey confirmed that they do not occur within the site or broader survey area, and therefore this principle is likely to be met.

Principle (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.

The native vegetation clearing area is located within the Geraldton Sandplains Biogeographic Regionalisation for Australia (IBRA) region (previously ‘Northern Sandplains’ region) of Western Australia. The ‘Le Sueur_7’ association was determined to have 33.63% of its pre-European extent remaining in the Geraldton Sandplains region in 2019, with 3.1% protected for conservation purposes. The ‘Le Sueur_1031’ association was determined to have 32.67% of its pre-European extent remaining in the Geraldton Sandplains region in 2019, with 12.35% protected for conservation purposes (Government of Western Australia 2019).

The vegetation proposed to be cleared is 0.49 ha within road reserves (see **Figure 4**), of which only 0.09 ha will be permanently cleared with the remaining 0.40 ha being rehabilitated, which is not considered a significant remnant of native vegetation. Extensive areas of remnant vegetation are protected in the adjacent established conservation reserves, such as Twyata Nature reserve and Badgingarra National Park, and therefore this principle is likely to be met.

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

A review of the *Geomorphic Wetlands, Cervantes Eneabba* dataset indicates that no geomorphic wetlands occur within the site.

Native vegetation within the application area is not associated with a wetland or water course, and therefore this principle is likely to be met.

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

The site is relatively flat and the proposal includes a relatively small extent of proposed native vegetation clearing. Hardstand or asphalt will be applied to the majority of cleared area, and vegetation will be allowed to regenerate in areas of vegetation trimming or temporary construction clearing once construction and hauling activities are complete. As such the proposal is unlikely to result in appreciable land degradation such as erosion, and therefore this principle is likely to be met.

Principle (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.

A potential indirect impact of the clearing is the introduction and/or spread of declared pests and other weed species into adjacent conservation areas (i.e. Twyata Nature Reserve and Badgingarra National Park). This will be mitigated through the implementation of hygiene protocols, as outlined in the EAMP, during the clearing process will minimise the introduction and spread of weeds and plant pathogens. This will include:

- Vehicles, machinery, and personnel to be free of mud/soil and plant material upon entering the site. Inspections will be completed prior to works commencing.
- Minimising clearing and earthworks during wet conditions.
- Minimising the extent of clearing and maintaining a buffer (where only vegetation trimming will occur) between the proposed clearing area and the adjacent Twyata Nature Reserve.

With weed control measures in place, the native vegetation clearing is unlikely to impact the bordering Twyata Nature Reserve and Badgingarra National Park, and therefore this principle is likely to be met.

Principle (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.

The site is well-removed from surface and groundwater sources or any riparian vegetation, and the proposed clearing is not likely to cause a deterioration in water quality.

While no ASS risk mapping exists for the site, no dewatering or significant excavation below groundwater is required for the intersection upgrade works. As a result, the potential risk of ASS is considered to be very low.

It is therefore unlikely that the proposed clearing will expose ASS or mobilise other contaminants that could result in a deterioration in water quality within or surrounding the clearing area, and therefore this principle is likely to be met.

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

The clearing of up to 0.49 ha of native vegetation in this location is not likely to cause or exacerbate the incidence or intensity of flooding, therefore this principle is likely to be met.

The area is subject to low rainfall with very little clearing or other uses that could significantly affect the incidence or intensity of flooding proposed. The activities associated with the clearing are not expected to affect ground levels or grades compared to current land uses. If this small area of native vegetation is cleared, the risk of having a significant impact on the incidence or intensity of flooding is considered very low and therefore this principle is likely to be met.

7 SUMMARY

The clearing area under application proposes the clearing of up to 0.49 ha of native vegetation in 'good-degraded' to 'very good' condition of which 0.09 ha will be permanently cleared and 0.40ha will be rehabilitated. Clearing associated with this proposal includes the removal of up to 0.49 ha of the **EtBaBmBc** plant community, 0.49 ha of the sandplain fauna habitat, and 0.49ha of primary native foraging habitat for Carnaby's black cockatoos. While one priority species was recorded in the application area, impacts to this

species will be avoided as it occurs within the vegetation trimming area and is well below the 3.5m trimming height.

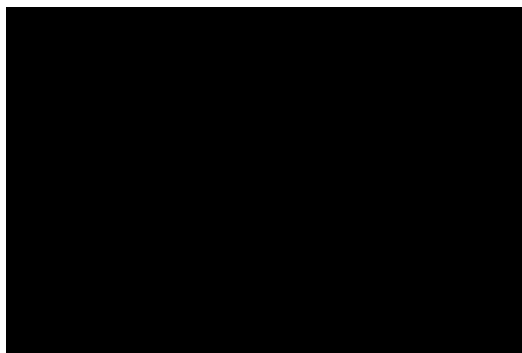
The applicant has undertaken processes to avoid and minimise the clearing of native vegetation and has included consideration of rehabilitation to occur across the application area.

A summary of responses to the clearing principles is provided in **Table 7**.

Table 7: Summary of responses to the EP Act clearing principles

Clearing principle	Compliance	Response to clearing permit principle
Principle (a)	Met	The native vegetation does not comprise a high level of biological diversity.
Principle (b)	Met	The native vegetation does not comprise the whole or a part of, or is necessary for the maintenance of a significant fauna habitat.
Principle (c)	Met	The native vegetation if cleared will not cause listed flora to become extinct.
Principle (d)	Met	The native vegetation does not comprise the whole or a part of, or is necessary for the maintenance of a threatened ecological community.
Principle (e)	Met	The native vegetation is not a remnant in an area that has been extensively cleared.
Principle (f)	Met	The native vegetation is not growing in, or in association with, an environment associated with a watercourse or wetland.
Principle (g)	Met	The native vegetation if cleared is not likely to cause appreciable land degradation.
Principle (h)	Met	The native vegetation if cleared is not likely to have an impact on the environmental values of any adjacent or nearby conservation area.
Principle (i)	Met	The native vegetation if cleared is not likely to cause deterioration in the quality of surface or underground water.
Principle (j)	Met	The native vegetation if cleared is not likely to cause, or exacerbate, the incidence or intensity of flooding.

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



Encl: Clearing Permit Application
Shapefiles of clearing areas

Figure 1: Site Location and Development Context
Figure 2: Clearing Areas
Figure 3: Plant Communities
Figure 4: Vegetation Condition
Figure 5: Priority Flora location
Figure 6: Fauna habitat
Figure 7: Carnaby's Black Cockatoo Foraging, Breeding and Roosting Habitat

Appendix A: Brand Hwy-Cowalla Intersection proposed site clearing layout plan
Appendix B: Main Roads Western Australia Authorisation for the Application of a Clearing Permit
Appendix C: Detailed Flora and Vegetation Assessment (Emerge Associates 2026b)
Appendix D: Basic Fauna and Targeted Bird and Bat Assessment (Emerge Associates 2026a)

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