

23 April 2015

Department of Environment Regulation
Locked Bag 33
CLOISTERS SQUARE
PERTH WA 6850

Dear Sir/Madam,

RE: Lot 12 Keane Road, Forrestdale – Clearing Permit Documentation

On behalf of Carrolup Capital Pty Ltd please find attached a Clearing Permit application to clear approximately 4ha of native vegetation on Lot 12 Keane Road, Forrestdale for an industrial subdivision. A description of the site and the vegetation proposed to be cleared is provided below.

1 Background

Lot 12 Keane Road, Forrestdale (the site) is owned by Carrolup Capital Pty Ltd and zoned 'Special Development' under the Armadale Redevelopment Authority Redevelopment Scheme. The site is proposed to be used for light industrial and service industrial purposes as part of the Forrestdale Business Park West (FBPW) Structure Plan (Attachment 1) which comprises Precinct 4A in the Armadale Redevelopment Area. The site is under the jurisdiction of the Metropolitan Redevelopment Authority (MRA) and is therefore not subject to the provisions of the Metropolitan Region Scheme or City of Armadale Town Planning Scheme No. 4.

Historical aerial photography shows that the site was completely cleared by 1965, however the southern half had regenerated by 2000 and currently the majority of the site contains native vegetation (Landgate, 2015a).

Given the industrial uses proposed for the site it is not anticipated that any native vegetation will be able to be retained. Therefore, the clearing permit being applied for includes the entire Lot 12 Keane Road area (Attachment 2).

Development Application

A Development Application (DA) for forward works including clearing and grubbing has been applied for by Meyer Shircore for the construction of a building and hardstanding area on the site.

The DA has been submitted to the MRA who have provided initial feedback and further requirements to be addressed.

2 Site Description

2.1 Land Use

The site was historically cleared by 1965 (Landgate, 2015a). It was leased out to be utilised for grazing horses until 2000. Historical aerial photography shows that some regeneration of vegetation had commenced in the south-western area of the site by 1995 when a row of trees were also planted in the north-eastern area (Plate 1). The lack of grazing since 2000 has enabled the site to regenerate and currently the majority of the site is vegetated as shown in Plate 2.

Plate 1: Historical Aerial Photography of the Site from 1995 (Landgate, 2015a)



Plate 2: Aerial Photography of the Site from 2015 (Landgate, 2015a)



2.2 Topography

The site is relatively flat at 24m Australian Height Datum (AHD), sloping gently to the west where it reaches 23m AHD off the site (DoW, 2015).

2.3 Geomorphology and Soils

The site is located on the Pinjarra System which consists of a poorly drained coastal plain landform with alluvium over sedimentary rocks (DAFWA, 2015). The soils are generally semi-wet with grey deep sandy duplexes, brown loamy earths, pale sands and clays.

The site contains two soils types, these are (DAFWA, 2015):

- Pinjarra, B2 Phase (213Pj_B2) located on flat to very gently undulating sandplain with well to moderately well drained deep bleached grey sands with a pale yellow B horizon or a weak iron-organic hardpan 1-2m.
- Pinjarra P8 Phase (213Pj_P8) located on broad poorly drained flats and poorly defined stream channels with moderately deep to deep sands over mottled clays; acidic or less commonly alkaline gley and yellow duplex soils to uniform bleached or pale brown sands over clay.

2.4 Surface Water and Wetlands

Historical and recent aerial photography does not show surface water to be present on the site. However, the historical photography indicates that when the site was cleared man-made drainage lines were also excavated and this would have altered the hydrology of the site (Landgate, 2015a).

The site was not originally identified in DPaW's *Geomorphic Wetlands of the Swan Coastal Plain* dataset as a wetland as shown on mapping from 2010 (Attachment 3). This is likely due to the site having been completely cleared by 1965. Environmental work was undertaken across the FBPW Structure Plan area in 2010, when the site had already regenerated, and the site was identified as having wetland values in the southern area. The entire site apart from an extremely thin section along the south-eastern boundary has since been included in DPaW's wetland dataset, evaluated as a Resource Enhancement (RE) wetland with the classification Not Assessed (UFI 15832) (Landgate, 2015b).

2.5 Flora and Vegetation

A vegetation survey carried out by Cardno (2010) identified two native plant communities on the site as follows and shown in Attachment 4:

- AsKg: Open Scrub of *Astartea scoparia* and *Kunzea glabrescens*. This plant community occurs on the southern half of the site, extending north slightly in the centre of the site.
- KgJs: Open Scrub *Kunzea glabrescens* over Open Low Shrubland *Jacksonia sternbergiana*, *Astartea scoparia* and *Hypocalymma angustifolium* over a mixed Open Herbland. This plant community occurs on the northern half of the site.

The vegetation condition on the site as mapped by Cardno (2010) ranged from Completely Degraded to Very Good (Attachment 5). The Completely Degraded sections are small areas occurring along the

boundary, while the majority of the site has been mapped as Very Good with a section mapped as Very Good-Good and a section as Good.

The two plant communities mapped by Cardno (2010) were considered to be representative of the Floristic Community Type 6 (FCT 6), described as weed dominated wetlands on heavy soils. FCT 6 is a 'Well Reserved' and 'Low Risk' community type and is not identified as a Threatened Ecological Community (TEC) or a Priority Ecological Community (PEC) (Cardno, 2010).

The flora survey undertaken by Cardno (2010) found no Threatened, Declared Rare or Priority species at State or Commonwealth level to be present on the site. *Dielsia stenostachya* is a Bush Forever significant species and was present on the site.

Quadrat data for locations sampled by Cardno (2010) within the site are provided in Attachment 6.

2.6 Fauna

A fauna survey of the FBPW Structure Plan area, including the site, identified two species of conservation significance that were known to use the area (Harewood, 2010). These species were Carnaby's Black Cockatoo (*Calyptorhynchus latirostris* – Endangered) and the Southern Brown Bandicoot (*Isodon obesulus fusciventer* – Priority 5).

There were a number of potential Black Cockatoo breeding habitat trees found in the FBPW Structure Plan area, however none occurred on the site (Harewood, 2010). There was also no evidence of foraging observed on the site and no evidence was found of trees being used for overnight roosting.

Bandicoot diggings were observed during the survey by Harewood (2010) and it was concluded that they are likely to be present in all areas within the vicinity that contain reasonably dense groundcover. The majority of the site contains vegetation in Very Good Condition therefore Bandicoots are likely to be present.

3 Environmental Approval

LandCorp, who own other lots within the FBPW Structure Plan area, requested advice from the Environmental Protection Authority (EPA) in 2012 on the likely environmental suitability of developing their Lot 801 Anstey Road, Forrestdale for industrial/commercial purposes. The EPA sought advice in the preparation of the response from the Department of Planning and the Department of Environment and Conservation (now DPaW). The Chairman of the EPA issued a letter to LandCorp on 13 April 2012 (Attachment 7) and also to the MRA on 19 December 2012. In their response, the EPA included the entire FBPW Structure Plan area, therefore including Lot 12 Keane Road (Attachment 1), and their view was that the environmental values that existed within the area had been adequately offset by the Negotiated Planning Solution (NPS) which protected the most significant environmental values in the locality and provided an appropriate management solution to the environmental values in the vicinity of a business park. The NPS involved LandCorp ceding land to the State for inclusion in Bush Forever Site 342, located adjacent to the FBPW Structure Plan area, resulting in the protection of consolidated remnant vegetation with secure long-term management arrangements in contrast to protecting small isolated areas of remnant vegetation.

The EPA's position is consistent with their advice on Bush Forever in January 2001, which stated that *"The EPA is unlikely to assess either a proposal or a scheme amendment referred to it if the Negotiated Planning Solution achieves a reasonable outcome expected through Bush Forever"*.

The EPA also provided comment on the presence of wetlands. The EPA took the view that the NPS resulted in the protection of a substantial area of Conservation Category Wetland within Bush Forever Site 342 within a consolidated area also containing upland vegetation and in accordance with EPA Guidance Statement No. 10 *"natural areas containing both upland and wetland ecological community groups support the highest biodiversity and are a focus for protection"*. Therefore the RE wetland on the site is not required to be retained.

4 Conclusion

The information contained in this letter supports the granting of a Clearing Permit application for Lot 12 Keane Road, Forrestdale on the basis of the EPA's position that any environmental values on the site have been adequately offset by the Bush Forever Negotiated Planning Solution process.

Please contact me if you would like full copies of the technical reports referred to in this letter and if you would also like some assistance on site during a site inspection.

References

- Cardno (2010) *Forrestdale Business Park West Flora and Vegetation Survey*. Prepared for Armadale Redevelopment Authority. Perth, Western Australia.
- Department of Agriculture and Food Western Australia (DAFWA) (2015) Natural Resource Management Shared Land Information Platform. Accessed April 2015 <http://maps.agric.wa.gov.au/nrminfo/framesetup.asp> Government of Western Australia, Perth.
- Department of Water (DoW) (2015) *Perth Groundwater Atlas*. Accessed April 2015 <http://www.water.wa.gov.au/idelve/gwa/> Government of Western Australia, Perth.
- Harewood, G. (2010) *Fauna Survey (Level 1) of Forrestdale Business Park West (FBPW) Forrestdale*. Prepared on behalf of Cardno. Bunbury, Western Australia.
- Landgate (2015a) Historical Aerial Photography. Accessed April 2015 <https://www.landgate.wa.gov.au/bmvf/app/mapviewer/> Government of Western Australia, Perth.
- Landgate (2015b) WA Atlas Shared Land Information Platform. Accessed April 2015 <https://www2.landgate.wa.gov.au/bmvf/app/waatlas/> Government of Western Australia, Perth.