

14 September 2017

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

Dear Sir/Madam,

RE: Shenton Park Rehabilitation Hospital – Clearing Permit Documentation

On behalf of Landcorp please find attached a Clearing Permit application to clear 1.52ha of native vegetation on the Shenton Park Hospital Redevelopment Site. Clearing is required to reduce the bushfire hazard level from extreme to low.

1 Background

The Shenton Park Rehabilitation Hospital has been closed with the transfer of rehabilitation services to the new Fiona Stanley Hospital. An Improvement Plan for the development of the site was prepared by LandCorp. The plan includes the removal of existing buildings that are not heritage listed and the construction of predominantly residential dwellings between 2 and 12 storeys high as well as potential health and mixed-use precincts. The project will deliver a wide range of housing types for a broad sector of the community including multi-generational and affordable housing.

There is an area covered by three fragmented patches of native vegetation totalling 2.27ha on the western boundary of the Shenton Park Hospital site. The vegetation within this area is rated as Good to Very Good over the site. The vegetation on the site has been historically impacted by the surrounding hospital development and there are large areas within the bushland that are currently completely cleared such as for an access road, a carpark and a drainage sump.

2 Proposed Clearing

The western bushland area has been assessed as having an 'Extreme' bushfire hazard rating as mapped on the DFES Bushfire Prone Areas Mapping and must have permanent fuel reduction management measures to reduce the hazard level. The hazard level applies to existing buildings on surrounding lots and to future residential dwellings.

The hazard reduction will be achieved by retaining bushland in its natural state in cells less than 2,500m² in size separated by low fuel zones. The bushland area is already separated into three areas, north, south and a central southern area separated by a carpark, an access road off Lemnos Street and internal access roads.

The three parcels of retained vegetation in the proposed clearing footprint contain a mixture of Good and Very Good condition vegetation. The amount and configuration of the bushland retained allows for the retention of a north-south ecological linkage in a way that also allows efficient development on the site in a fire sensitive manner.

The low fuel zones between the parcels of retained vegetation can include low native shrub ground cover, and as such will ensure the parcels of native vegetation remain connected. The parcels of retained vegetation will be rehabilitated to improve their habitat values. A Landscape Masterplan has been prepared for the area (Attachment 1). The Landscape Masterplan details the required rehabilitation of these areas and is a requirement of the Shenton Park Hospital Redevelopment Structure Plan which was endorsed on the 15 February 2017. The intent for the western bushland is to provide a high amenity environment that promotes the retention of cells of high quality remnant vegetation while providing the necessary setbacks and separation corridors to ensure public safety. Retained cells will contain rehabilitated vegetation with a full tree canopy and understory.

Whilst the clearing plan has been prepared to show that the separation areas between the retained bushland cells are to have no trees retained, LandCorp is working with a Tier 3 accredited Bushfire Consultant, the City of Nedlands, Arborist and Landscape Architects to retain every tree possible. The landscape masterplan (Attachment 1) which details the ultimate plan for this area has been prepared with our specialist consultants to assess the health, longevity, potential bushfire risk and overall contribution to visual amenity each tree within the identified clearing areas poses. This highly detailed approach will ensure the minimal amount of tree removal occurs and will also identify opportunities for additional tree planting within the low fuel zones. However, this option requires approval from the City of Nedlands and their support for the ongoing maintenance obligation to control the bush fire risk.

3 Environmental Approvals

3.1 Environmental Protection Act, 1986

MRS Scheme Amendment 1293/57 was referred to the Environmental Protection Authority (EPA) under Section 48A of the Environmental Protection Act. The EPA determined the level of assessment for the Amendment as 'Scheme Not Assessed – Advice Given' (Attachment 2). The advice states:

The EPA supports the proposal to retain the Banksia woodland in Public Open Space and to also retain as much remnant vegetation as possible. The EPA expects that this advice will be implemented as part of the local planning scheme and subsequent subdivision and development applications.

The Woodland Precinct description of the Improvement Scheme Report and the POS Plan and Schedule demonstrate the intentions to keep as much vegetation on the western portion as possible.

The development of the site under an Improvement Scheme and approved Improvement Plan does not negate the requirement for approvals under environmental legislation. The Improvement Scheme was lodged with the Western Australian Environmental Protection Authority (EPA) pursuant to Section 48A of the *Environmental Protection Act 1986* [WA] (EP Act). The Decision was 'Scheme Not Assessed: Advice Given (Attachment 2)

3.2 Environment Protection and Biodiversity Conservation Act 1999

The proposed development on the Shenton Park Rehabilitation Hospital site was referred to the Department of the Environment and Energy (then Department of the Environment) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (EPBC 2015/7622).

At the stage of planning for the redevelopment when the project was referred it was unclear what vegetation is to be retained. While committing to retaining as much vegetation as possible LandCorp referred the worst-case scenario that all of the vegetation on the site may potentially be cleared to allow flexibility in designing the configuration and management of the bushland area and individual tree retention.

Following a review of submissions, the EPBC Referral for clearing all native vegetation on the site was deemed to be 'Not a Controlled Action' on 29 January 2016 (Attachment 3). This decision meant that, pursuant to the EPBC Act, the proposed development of the whole site has approval to proceed under the EPBC Act.

A request for reconsideration of this decision was rejected by the Minister's Delegate in March 2016.

4 Site Description

4.1 Topography

The site is gently undulating sloping from the south-western corner at 30m Australian Height Datum (AHD) down to the lower lying area in the north-east at 10mAHD.

4.2 Soil

The soil on the site has been mapped by the Department of Agriculture and Food Western Australia (DAFWA, 2015) as Spearwood S7 Phase (211Sp_S7) which is described as sand with pale and olive yellow, medium to coarse-grained, sub-angular to sub-rounded quartz and trace of feldspar. The soil is moderately sorted of residual origin.

Acid Sulphate Soil (ASS) Risk mapping of the Swan Coastal Plain indicates that the site has a Low risk of ASS (<3m from the surface) (Landgate, 2015). There will be no excavation and therefore ASS is not likely to be disturbed.

The site contains a number of species that are listed as susceptible to *Phytophthora cinnamomi* (Jarrah Dieback) and are located on all parts of the remnant bushland as well as scattered amongst the developed area. These species would not be present on the site if *Phytophthora* Dieback were present, therefore the site is considered Uninfested.

Hygiene and management protocols for Dieback will be undertaken during construction in the surrounding area to protect the retained native vegetation.

4.3 Flora

A flora survey of the Shenton Park Rehabilitation Hospital site recorded 109 plant taxa including 67 native and 42 introduced species (GHD, 2012; Attachment 4). A targeted flora and vegetation survey was undertaken by PGV Environmental on 23 September 2013 (Attachment 5). The prime species of interest in the targeted survey, *Caladenia huegelii*, was not recorded on the site. No listed flora species have been recorded on the site. A second survey was undertaken in 2016 by PGV Environmental (Attachment 6) and again no Conservation Significant species were recorded on the site.

The Priority species, *Jacksonia sericea*, was found to be on the site with more than 100 plants observed, mostly in the southern bushland area. Some *Jacksonia sericea* will be retained in the bushland cells.

Typical native shrub species in the understorey include *Xanthorrhoea preissii*, *Jacksonia furcellata*, *Hypocalymma robustum*, *Hibbertia hypericoides*, *Petrophile macrostachya* and *Acacia huegelii* while common herbs and sedges include *Caesia micrantha*, *Mesomelaena pseudostygia*, *Schoenus grandiflorus* and *Desmocladius flexuosus* (GHD, 2012).

4.4 Vegetation

The vegetation on the site was surveyed by GHD (2012) and described as Jarrah/Banksia over mixed shrubs and herbs. The native vegetation contains a northern and southern patch separated by a carpark with garden beds and an access road into the carpark. The Floristic Community Type is likely to be FCT 28 “Spearwood *Banksia attenuata* or *B. attenuata* – *Eucalyptus* woodlands” which is not a Threatened Ecological Community (TEC) under Western Australian ranking.

The *Banksia Woodlands of the Swan Coastal Plain* TEC, which is listed under the EPBC Act, is not a relevant consideration to the clearing due to the date of the listing being after the EPBC Referral decision.

The condition of the vegetation was assessed by GHD as Good in the northern half and Good to Very Good in the southern half.

The condition of the understorey is variable. In some places, the understorey is reasonably intact with a mix of mid and smaller shrubs as well as a range of herbs and sedges while in other areas the understorey is dominated by introduced grasses such as Veldtgrass (*Ehrharta calycina*) and Wild Oats (*Avena fatua*) as well as other weed species.

4.5 Fauna

The fauna habitat on the site has some connectivity to areas of native vegetation to the north and south. The remnant woodland habitat is considered to be Good fauna habitat.

A study on the movement of small birds using the site as part of an ecological corridor was undertaken (Attachment 7). The native fauna that could use the ecological corridor to move between the two

Bush Forever sites would mainly include birds and small reptiles. Movement of larger ground-dwelling fauna, if they exist in the area, would be restricted by the tall chain-mesh fence around the Underwood Avenue site to the north and a wire mesh fence on the southern side of the remnant bushland on the Hospital site. The presence of Lemnos Street would also provide a barrier to the safe movement of any ground-dwelling fauna between the site and the Shenton Bushland to the south. Feral predators including cats and possibly foxes would also restrict the number and types of fauna living and moving within the corridor.

The vegetation provides some foraging habitat and potential breeding habitat for Carnaby's and Forest Red-tailed Black Cockatoos.

5 Planning Context

5.1 Directions 2031 and Beyond (WAPC, 2010)

Directions 2031 and Beyond is the high level spatial framework and strategic plan for the Perth and Peel metropolitan regions. Directions 2031 provides a framework for the detailed planning delivery of the housing, infrastructure and services necessary for a variety of growth scenarios. The Shenton Park Rehabilitation Hospital site is designated a 'minor growth' area within the framework (WAPC, 2010).

5.2 State Planning Policy 3.5 – Historic Heritage Conservation

Whilst most of the former hospital buildings have been demolished, part of the site, containing the 1938 Administration and Ward Block [Victoria House] and the 1963 Paraplegic Block [Block G] is State heritage listed as P2971 Shenton Park Rehabilitation Hospital. These buildings will be sold and adapted for new uses, with essential conservation works to be carried out by the new owners under separate Heritage Agreements.

5.3 MRS Amendment 1293/57

The MRS (Amendment 1293/57) to transfer the land within the SPHR site from the Public Purposes - Hospital reservation to the Urban zone was gazetted on the 17 January 2017. Whilst it is not essential that the site be rezoned, as an Improvement Scheme would take precedence over the existing Public Purposes - Hospital reservation, the amendment will ensure that the zoning of the land is consistent with the redevelopment objectives for the site.

5.4 Improvement Plan 43

The site makes up most of the area that was designated as Improvement Plan 43 in February 2015. The recommendation was accepted by the Deputy of the Governor on 23 June 2015 and adopted by the Western Australian Planning Commission in June 2015. Subsequently, an Improvement Scheme was prepared over the Improvement Plan area, and has been considered appropriate for Public Advertising (pending Ministerial consent). An Improvement Plan is designed to streamline the planning process and ensure the features of the site are managed appropriately. The Improvement Plan provisions will prevail over the Metropolitan Region Scheme and the City of Nedlands Town Planning Scheme No. 2.

5.5 Improvement Scheme

The Shenton Park Improvement Scheme was gazetted on 17 January 2017 following Minister for Planning Approval on 15 December 2016. The Improvement Scheme is supported by a framework of plans and policies. The draft Structure Plan and Design Guidelines were advertised with the Improvement Scheme and are currently being finalised by Department of Planning.

6 Environmental Planning Background

The following policies, plans and documents have been addressed during the design of the redevelopment.

6.1 SPP 2.8 Bushland Policy for the Perth Metropolitan Region

State Planning Policy 2.8 Bushland Policy for the Perth Metropolitan Region was released by the Western Australian Planning Commission in 2010 and has the aim of providing a policy and implementation framework to guide bushland protection and management in the context of broader land-use planning and decision making such as social and economic considerations. While an important part of the policy is to protect significant bushland areas, as stated the policy does not prevent development where it is consistent with the policy measures.

The policy focuses predominantly on the protection of Bush Forever sites, however it is also applicable to local bushland areas outside of Bush Forever sites. As the Shenton Park Rehabilitation Hospital is not within a Bush Forever area the local bushland aspect of the policy is the part that applies to the development.

With regards to local bushland in the Perth Metropolitan Region and outside Bush Forever areas the policy includes several policy measures which are:

- (i) Local authorities should seek to prepare a local bushland protection strategy which should be part of a wider local biodiversity strategy, a component of a wider local planning strategy and based on metropolitan-wide guidelines endorsed by the WAPC. The strategy should identify significant bushland sites for protection and management based on environmental, social and economic criteria. Identification of significant sites should occur at the structure planning and rezoning stages.
- (ii) Where a local bushland protection strategy has not been prepared or formally endorsed local authorities should seek to identify and protect significant bushland through other planning processes such as structure plans and rezoning.
- (iii) Proposals or decision making should have regard to the protection of significant bushland sites recommended for protection in an endorsed local bushland protection strategy or through other planning processes or studies that have been endorsed by the local authority and the WAPC.
- (iv) Proposals or decision making should support a general presumption against the clearing of bushland for areas containing the environmental values identified in Appendix 2 (ix) (b) and System 6 Recommendation Areas.

- (v) Proposals or decision making should proactively seek to safeguard, enhance and establish ecological linkages between Bush Forever areas and those areas identified for protection through the implementation of the specific policy measures in this section.

The application of the five policy measures for local bushland to the Shenton Park Rehabilitation Hospital site follows:

- (i) To the best of our knowledge the City of Nedlands has not prepared a local bushland protection strategy for the whole City. However, the City has prepared a Draft Bedbrook Place Biodiversity Local Planning Policy that covers the western end of the Shenton Park Hospital site as well as other private landholdings west of Bedbrook Place. The City has also prepared the Nedlands Greenway Corridors Policy which is also relevant to the site. In addition, the Western Suburbs Greening Plan also covers bushland areas in the City of Nedlands.
- (ii) and (iii) A local bushland protection strategy has not been prepared by the City of Nedlands, however council is guided in its decision making by the Nedlands Greenway Corridors Policy and possibly by the Bedbrook Place Biodiversity Local Planning Policy although this is still in Draft status.
- (iv) Policy measure (iv) refers to the general presumption against clearing of bushland areas containing environmental values identified in Appendix 2
- (ix) (b). These environmental values are areas containing:
 - Threatened Ecological Communities (TEC) and species listed under the EPBC Act 1999;
 - Threatened Ecological Communities recognised at the State level by the Minister for the Environment;
 - Threatened and poorly reserved plant communities (preliminary maps, EPA, 1994);
 - Declared Rare Flora or specially protected fauna; and, where possible, priority or significant flora or fauna;
 - Lakes or wetlands listed in the EPP (Swan Coastal Plain Lakes) Policy or other significant vegetated wetlands;
 - Vegetation complexes where less than 10 per cent of the original extent currently remains (this generally correlates with vegetation on the eastern side of the Swan Coastal Plain portion of the Perth Metropolitan Region); and
 - Wetland dependent vegetation fringing creeks, rivers and estuaries and appropriate buffer and foreshore requirements.

The Shenton Park Hospital site does not contain TECs recognised by the State or under the EPBC Act. The site also does not contain Declared Rare Flora, significant lakes or wetlands. The site does contain one Priority 4 listed flora species and habitat suitable for listed fauna species, the Carnaby's and Forest Red-tailed Black Cockatoos.

The vegetation complex on the site is representative of the Karrakatta – Central and South vegetation complex. According to Bush Forever (Government of Western Australia, 2000 Volume 1 Table 4) 18% of the original extent of this vegetation complex remains on the Swan Coastal Plain portion of the Perth Metropolitan Region.

The 2.5ha of remnant vegetation and isolated trees within the existing development do not contain most of the environmental values listed in SPP 2.8 Appendix 2. The Banksia woodland and isolated trees do contain habitat for listed fauna for the two species of Black Cockatoo. Some clearing of the

Banksia woodland area is required for development of the site, particularly for fire hazard reduction purposes. Therefore, while the proposed development would have a small impact on conservation values identified in SPP 2.8 the impact is unlikely to be so significant that a decision-making authority would refuse an application for development on the basis that it contravenes SPP 2.8 on this point.

The Shenton Park Hospital site is located between two Bush Forever sites with Bush Forever site 218 'Shenton Bushland, Shenton Park' located to the south across Lemnos Street and Bush Forever Site 119 'Underwood Avenue Bushland, Shenton Park' located approximately 130m to the north. The portion of the Lot 4 Underwood Avenue Bush Forever site that has State environmental approval as a Conservation Area is located a short distance to the north of the Shenton Park hospital complex. The vegetation in the western part of the site is part of a semi-contiguous patch of bushland that includes other remnant bushland areas on other parts of the general area between the proposed redevelopment site and the Subiaco Waste Water Treatment Plant to the west. Together the areas of bushland provide an ecological link between the two Bush Forever sites.

The native fauna that could use the ecological corridor to move between the two Bush Forever sites would mainly include birds and small reptiles. Movement of larger ground-dwelling fauna, if they exist in the area, would be restricted by the tall chain-mesh fence around the Underwood Avenue site to the north and a wire mesh fence on the southern side of the remnant bushland on the Hospital site. The presence of Lemnos Street would also provide a barrier to the safe movement of any ground-dwelling fauna between the site and the Shenton Bushland to the south. Domestic and Feral predators including cats and possibly foxes would also restrict the number and types of fauna living and moving within the corridor.

The proposed development on the site will retain vegetation in the western part of the site with a north-south orientation that retains links to the Conservation Area on Lot 4 Underwood Avenue to the north of the site and through to Lemnos Street to the south. While the width of the vegetated area would be reduced the ecological values of the link would not be substantially reduced from the current values. This is due to the current condition of the bushland in this area which is already narrow at 30-100m wide and has an understorey that is Degraded to Good in the northern part and Degraded to Very Good in the southern part and has existing barriers to some fauna movement in the carpark between the two bushland parcels and accessways.

With respect to size and viability of urban bushland remnants the current amount of native vegetation, 2.5ha is well under the Bush Forever target of at least 20ha for viable reservations and is under the Urban Bushland Policy minimum size of 4ha.

With respect to the width of ecological corridors there is not firm guidance for minimum widths in urban areas. A figure of 100m and up to 300m is sometimes used as a minimum width. With regards to both the size and width of the POS, therefore, it could be argued that the current size of the site and width on the site, ranging from a minimum of 30m east of the carpark to 100m for the southern bushland block, is already too small to be viable as an ecological linkage. Nevertheless, native vegetation will be retained on the site in a configuration that will enable any ecological linkage functions to be maintained and is unlikely to be at variance to SPP 2.8.

6.2 Greenways Plan

The bushland is identified as a part of Greenways 19. The Greenways Plan has no statutory effect, however with the retention of the patches of bushland and change of land use from private to public open space the environmental objectives of the Greenways Plan would be satisfied and public use of the linear greenways would be provided which it currently is not.

6.3 Framework for Perth Peel @3.5million

The Perth and Peel @ 3.5 million framework acknowledges the importance of infill development and maintaining ecological linkages. The Improvement Scheme Structure Plan addresses all of the recommendations within the framework, including the retention of a linkage in the western part of the site, resulting in a balanced outcome for the development.

6.4 WESROC Greening Plan

The site is part of a broad area identified as a Regional Greenway in the WESROC Greening Plan. The greenway in this area extends from the eastern side of Selby Street westwards for about 600m to west of Bedbrook Place. This strip connects with broad areas south and north which include not just the Shenton Bushland and Underwood Avenue Bush Forever sites but other developed areas such as Tuart College, the Department of Health site and the entire UWA Agriculture field station.

The WESROC Greening Plan states that *“for those areas which have moderate to high conservation values but are still in either private or government or institutional hands strategies need to be developed to ensure that as far as possible the land is managed for conservation purposes”*. The Shenton Park Rehabilitation Hospital site appears to fall into that category. In mapping, sites over public and private landholdings that have largely been developed, particularly for institutional purposes, but still retain some native vegetation on the land, the WESROC Greening Plan is clearly aspirational in its objectives. The retention of a north-south ecological linkage with low-fuel planted areas in the western part of the Shenton Park Rehabilitation Hospital site contributes to the aim of developing and maintaining a greenway for its natural and social benefits.

6.5 Capital City Planning Framework

The Capital City Planning Framework looks at the strategic development of a 12km by 12km area around the Perth Central Business District. The framework seeks to:

Improve ecological connectivity by progressing the recommendations provided in the Central Perth Regional Parklands Concept: Vegetation Connectivity Analysis, and facilitate people movement between sites, notably in Regional Connectivity Zones and Parkland Enhancement Zones, and appropriate access through public land.

The Shenton Park Rehabilitation Hospital is within the Regional Connectivity Zone.

The Capital City Planning Framework Vegetation Connectivity Analysis Report is a support document for the Capital City Planning Framework. The support document aims to investigate options to establish a green network. The Guiding Principles in the Connectivity Analysis state:

- *The widest possible diversity of habitat types should be sought within a linkage with similar habitats (preferably) with less than 500 m – 1000 m apart.*

- *Regional corridors should be 500 m wide where possible and a minimum of 300 m.*
- *Re-vegetation is a viable strategy for establishing or strengthening corridors in cleared landscapes, with priority given to opportunities to expand existing remnant vegetation. Aim to form continuous vegetated linkages or corridors at least 100 m wide. If this is not possible, ensure stepping stones of reconstructed or created habitat are at least 2 ha to 4 ha in size and no more than 500 m to 1000 m apart.*

Currently the gap between pockets of native vegetation on the site is approximately 60m and under the proposed plan will decrease to approximately 40m. The vegetation cannot meet any of the recommended dimensions for a regional corridor. The two Bush Forever sites are large stepping stones within 500-1000m from each other. The vegetation on the Shenton Park Rehabilitation Hospital site would not be considered as part of a Regional Corridor. The retained vegetation and planted low fuel zones will provide additional linkage in the area, augmenting the regional corridors.

The Shenton Park Rehabilitation Hospital site is located within Target Area 1 which has the following targets:

- Retain all remaining remnant vegetation in viable well connected patches through sensitive development design;
- Examine use of small POS (<5ha) for vegetation restoration to result in patch of restored habitat >2ha;
- Engage expert to design any fauna species habitat restoration.

The site is in the mapped area of:

- Target streets/areas for retaining urban trees and native vegetation, and providing nature strips and tree planting/plant subsidy programme

The proposed clearing for bush fire risk mitigation still retains naturally vegetated strips and retains urban trees.

7 Ten Clearing 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 1: Vegetation should not be cleared if it comprises a high level of biological diversity.

The site contains Good to Very Good native vegetation that has a significant cover of weeds in areas. No significant flora species or vegetation communities occur on the site. Therefore, it is considered that the site does not have a high level of biodiversity and the proposed clearing is not at variance to this principle.

Principle 2: 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 has been impacted by previous clearing and land use. Current linkage functions will mostly be retained. The low fuel zone areas will also provide habitat for reptiles and rehabilitation of

the central eastern cell will improve the habitat values in this area. The bushland has some habitat for Black Cockatoos and removing all of the vegetation on the site was considered not to have a significant impact on this species under the EPBC Act. The proposed clearing is not at variance to this principle.

Principle 3: Vegetation should not be cleared if it includes, or is necessary for the continued existence of rare flora.

Targeted surveys and flora surveys have been carried out on the site (Attachments 2 and 3) and no listed species have been recorded. It is highly unlikely rare flora is present on the site. One Priority 4 species, *Jacksonia sericea*, was recorded in abundance in the native woodland on the site with approximately 100 plants present, which will be largely retained within the southern bushland cell. Therefore, the proposed clearing is not at variance to this principle.

Principle 4: 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 not at variance to this principle.

Principle 5: 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, being surrounded by Bush Forever sites 119 and 218. The vegetation will be retained in part, enhanced in one area and have low fuel zones planted between. Therefore, clearing is not at variance to this principle.

Principle 6: Vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.

There are no wetlands on the site, therefore the clearing will not be at variance to this principle.

Principle 7: 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.

Principle 8: 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.

The clearing will not impact on the values of the nearby Bush Forever sites with small linkage values maintained in the proposed bush fire risk mitigation.

Principle 9: 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 clearing of 1.52ha will not result in deterioration in the quality of surface or underground water.

Principle 10: Vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence of flooding.

The clearing of the vegetation will not increase the incidence of flooding.

Applying the Ten Clearing Principles to the site indicates that the clearing of the 1.52ha of vegetation will not have a significant impact on the environment.

8 Conclusion

Assessment of the proposed clearing of 1.52ha of vegetation for bush fire risk mitigation and the enhancement of the central eastern vegetation and planting of the low fuel zones on the Shenton Park Rehabilitation Hospital site concludes that the clearing would not have a significant impact on the environment.

Please contact me if you would like any further information or if you would like some assistance on site during a site inspection.

Yours sincerely



Paul van der Moezel
Managing Director

Attachments

Clearing Permit Application Form
Form C3 Credit Card Payment
Certificate of Title

Figure 1: Proposed Clearing Area

Attachment 1: Landscape Masterplan (August 2017)
Attachment 2: MRS Amendment Approval – EPA
Attachment 3: EPBC Approval
Attachment 4: Flora and Fauna Assessment
Attachment 5: Targeted survey 2013
Attachment 6: Targeted Survey 2016
Attachment 7: Fauna Linkage Study