16 March 2021

To	Western Power		
Copy to			
From	GHD Pty Ltd	Job no.	12543894
Subject	Assessment of environmental impacts and recommendations		

1 Introduction

1.1 Background

Western Power requires a Native Vegetation Clearing permit (NVCP) to construct a distribution cable connection from Western Power's existing power pole on William Street, to a customer (CBH) at Lot 550 Sewell Street in Brookton. The project is located within the Brookton townsite, 117 kilometre (km) south east of Perth Central Business District (CBD).

The project footprint represents the area within which clearing of native vegetation will occur. The total footprint (indicative clearing area) is 0.21 hectares (ha), of which 0.05 ha comprises cleared access tracks and 0.02 ha of road, with the remaining extent being native vegetation (0.14 ha) (Figure 1). The proposed works will require native vegetation clearing of up to 0.14 ha (actual clearing area). Clearing will occur along Lefroy Street between Richardson Street and the rail reserve (R 10325), and also within Sewell St road reserve and the adjacent Lot 550. This will enable construction of overhead and/or underground distribution cable and associated infrastructure (e.g. power poles). Works are anticipated to take at least three weeks (3) to complete. The removal of existing infrastructure is also required as part of the works including three (3) poles and the associated overhead cable as shown on Figure 1.

GHD has undertaken a high-level review of environmental values to determine whether the project is likely to be at variance to any of the ten clearing principles under the *Environmental Protection Act 1986* (EP Act).

1.2 Memorandum purpose and scope

The purpose of this memorandum is to provide:

- Consideration of whether the project is likely to be at variance to any of the ten clearing principles as outlined in Schedule 5 of the EP Act and Environmental Protection (Clearing of Native Vegetation) Regulations 2004
- Assessment of the potential impacts to flora and vegetation that may result from the project
- Recommendations for minimising the potential impacts of the project.

2 Land tenure

Table 1 provides the land tenure details for the project footprint within which clearing of native vegetation will occur.

Table 1 Land tenure details

Lot number	Parcel ID	Street address	Land type	Land manager
73	P222180	137 Richardson St, Brookton	Crown	Peter John Farley
394	P222180 R23384	8 Lefroy Street, Brookton	Crown Reserve	Seabrook Aboriginal Corporation (SAC)
N/A	P Road	Robinson Street	Reserve	Shire of Brookton
N/A	P Road	Lefroy Street	Reserve	Shire of Brookton
N/A	P Road	Richardson Street	Reserve	Shire of Brookton
N/A	P Road	Williams Street	Reserve	Shire of Brookton
N/A	P Road	Sewell Street	Reserve	Shire of Brookton
550	P416002	27 Sewell St, Brookton	Crown	CBH Group

Western Power have committed to not undertaking clearing of native vegetation within the rail reserve (R 14197 and R 10325) shown on Figure 1. The distribution line will be installed via sideways drilling. Both the launching (entry) and receival (exit) pits are located outside the rail reserve. Sideways drilling within the rail reserve will occur at a minimum depth of 2.5 m. The diameter of poly-pipe to be installed is 160 mm. It is not expected that the proposed underground works in the rail corridor will impact native vegetation or root systems. One of the poles proposed to be removed is located within the rail reserve (pole B0555/1A), however, no clearing of native vegetation is required to undertake this work. PTA has approval from the land manager, Arc Infrastructure, to undertake these works (**Attachment 1**).

Western Power have also committed to notify SAC (land managers of P222180 and R22384) of clearing dates and invite SAC to view the site prior to commencement of clearing.

3 Desktop assessment

A high-level desktop environmental assessment was undertaken of the project footprint, the results are provided in Table 2.

Table 2 Desktop Environmental Assessment

Dataset Name	Dataset No.	Significance	Potential trigger for State/Commonwealth approvals
Environmentally Sensitive Areas (ESAs) – Clearing Regulations	DWER-046	No	No
Native Vegetation Extent WA	DPIRD-005	Yes – native vegetation intersects site	No – the project footprint is 0.21 ha with approximately 0.14 ha of native vegetation within the project footprint
Public Drinking Water Source Areas (PDWSA)	DWER-033	No	No – Brookton Reservoir Catchment Area – Surface Water is approximately 4 kilometres (km) west of site
Geomorphic Wetlands/ RAMSAR Wetlands	DBCA-019 DBCA-045	No	No
Soil Landscape Land Quality	DPIRD-042	No	No
Aboriginal Heritage Places	DPLH-001	No	No – the Cutting Brookton (registered site ID 3,430) is 2.3 km west of the site
Threatened and Priority Flora WA	DBCA-036	No	No – the closest threatened/ priority flora is threatened/ Priority 4 flora species 3 km southwest of the site
Threatened and Priority Fauna WA	DBCA-037	No	No – the closest fauna record is a specially protected bird species – Peregrine falcon recorded approximately 1.5 km southwest of the site.
Threatened Ecological Communities (TEC)	DBCA-038	Yes – critically endangered TEC across the site	No – Although the Protection Matters Search Tool (PMST) (**Attachment 2**) identified *Eucalypt* Woodlands of the Western Australian Wheatbelt across the project footprint, the extent of clearing proposed is not considered significant to warrant referral under Part IV of the *Environmental Protection Act 1986* or the *Environmental Protection and Biodiversity Conservation Act 1999* (Figure 2).
Naturemap (State)	-	Yes – NVCP required for clearing of native vegetation	No potential trigger for State referral was identified – see **Attachment 3** for Naturemap Report. A Naturemap search around the site with a 10 km buffer was conducted. – 364 records of 119 animalia species were identified – 20 records of 17 fungi species were identified – 355 records of 194 plantae species were identified – No records of priority flora or fauna within the site.

Dataset Name	Dataset No.	Significance	Potential trigger for State/Commonwealth approvals
			The nearest species identified near the project footprint are: – *Diurus corymbosa Lindl* was recorded approximately 720 m south of the site. – *Eucalyptus rudis* was recorded approximately 1 km east of the site. Given the project footprint is 0.21 ha, with 0.14 ha of clearing proposed, the project is unlikely to cause a significant impact to the Environmental Protection Authority environmental factors.

4 Assessment against the ten clearing principles

In Western Australia, the Department of Water and Environmental Regulation (DWER) regulates native vegetation clearing under Part V of the EP Act, unless the proposal is formally assessed by the EPA or a clearing permit exemption applies. The clearing of native vegetation in Western Australia requires a permit under Part V of the EP Act. The project does not require formal assessment by the EPA and no exemption applies.

An assessment of the project area against the ten clearing principles outlined in Schedule 5 of the EP Act was undertaken with reference to DWER guidelines *A guide to the assessment of applications to clear native vegetation under Part V Division 2 of the EP Act* (DER 2014).

The assessment of the project area against the ten clearing principles concluded the proposed clearing is likely to be at variance with principle (d) which states:

> *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.*

The EPBC Act PMST and DBCA database search identified the potential presence of critically endangered TEC '*Eucalypt* Woodlands of the Western Australian Wheatbelt' within the project footprint. Native vegetation present within the project footprint (0.14 ha) may potentially represent the *Eucalypt* Woodlands TEC. Measures to avoid and mitigate impacts to native vegetation (and the TEC if present) are outlined in Section 5.

The project is considered likely to be at variance to principle (d) due to the potential presence of *Eucalypt* Woodlands of the Western Australian Wheatbelt TEC. However, given the very limited extent of proposed clearing (0.14 ha), the location of clearing in relation to other existing disturbances (e.g. roads, rail and completely disturbed land), and proposed mitigation measures the impact of this clearing is not considered environmental significant.

The project is considered 'not at variance' or 'unlikely to be at variance' to the remaining principles given the location of the project footprint in relation to existing disturbance/infrastructure, the extent of proposed clearing (0.14 ha), and the surrounding environmental setting.

5 Avoidance and mitigation measures

Western Power are committed to implementing the following impact avoidance measures:

- Construction of the overhead distribution line along an existing cleared access track (see pink dotted line in Figure 1)

- Sideways drilling to install the underground distribution line to minimise clearing of native vegetation in railway reserves (see blue dotted line in Figure 1). Clearing for sideways drilling will be limited to a 5 m x 5 m pit at launching and receival locations outside of the rail reserve
- Use of existing cleared areas (tracks, roads) where practicable, to access the site and undertake works
- Use existing cleared areas and other areas likely to be impacted from new works, when removing existing poles and distribution cable (see turquoise dotted line in Figure 1).

Western Power are committed to implementing the following impact mitigation measures:

- Clearing areas will be clearly demarcated on site prior to the commencement of clearing
- Implementation of weeds hygiene protocol during construction, including cleaning of vehicles, heavy equipment, tools and footwear prior to entry and exit from vegetated areas
- Limit vehicle speeds within the project footprint to minimise the risk of fauna strike.

6 Conclusion

The total project footprint is 0.21 ha, of which 0.14 ha comprises native vegetation (potentially representing *Eucalyptus* Woodlands TEC) which could be impacted by project works. The project is likely to be at variance with principle (d), which related to TECs. Impacts to the TEC will be managed as per the avoidance and mitigation measures outlined in Section 5 of this memorandum.

The project is considered unlikely to significantly impact the environment given the location of the project footprint in relation to existing disturbance/infrastructure and extent of proposed clearing.

7 References

Department of Agriculture, Water and the Environment (DAWE) 2020, *Environmental Protection and Biodiversity Conservation Act 1999 Protected Matters Search Tool Results,* retrieved January 2021 from http://www.environment.gov.au/epbc/pmst/index.html.

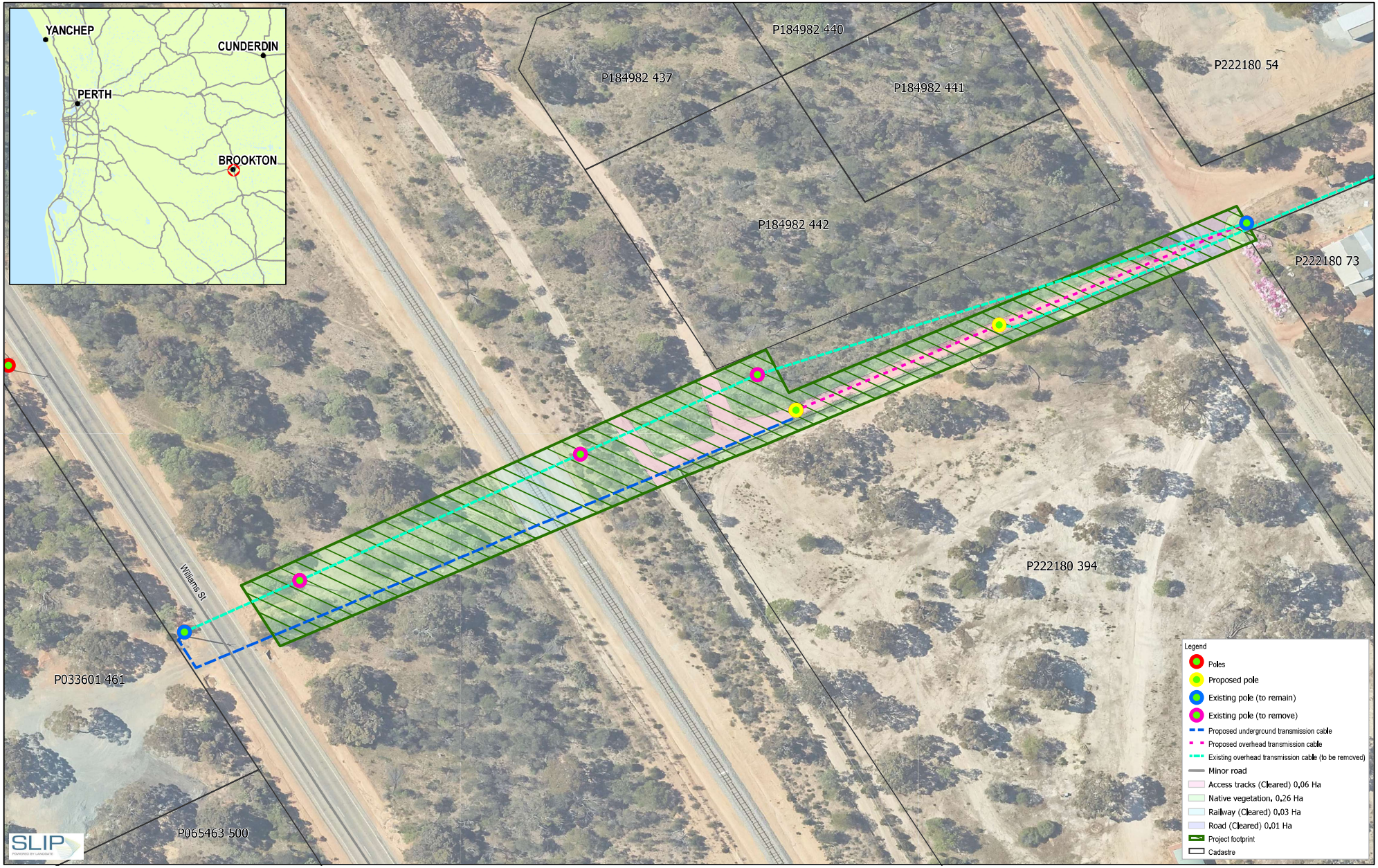
Department of Biodiversity, Conservation and Attractions (DBCA) 2007–, *NatureMap*: Mapping Western Australia's Biodiversity, retrieved January 2021, from https://naturemap.dpaw.wa.gov.au/default.aspx

Department of the Environment and Energy, *Eucalypt Woodlands of the Western Australian Wheatbelt: a nationally protected ecological community*, from https://www.environment.gov.au/system/files/resources/27022643-7a75-47bf-95b1-66d36bff9109/files/guide-eucalypt-woodlands-wa-wheatbelt.pdf.

Department of Environment Regulation (DER) 2014, *A guide to the assessment of applications to clear native vegetation under Part V Division 2 of the EP Act*, Government of Western Australia, December 2014.

Government of Western Australia (GoWA) 2020, Data WA, retrieved January 2021, from https://data.wa.gov.au/

Figure 1 – Project Location
Figure 2 – Threatened Ecological Communities & Priority Flora & Fauna
Attachment 1 – Arc Infrastructure Approval
Attachment 2 – PMST Search Results
Attachment 3 – Naturemap Search Results



Paper Size ISO A3

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Meters

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GHD

Western Power
CBH Brookton

Project overview

Project No. 12543894
Revision No. A
Date 27/01/2021

FIGURE 1

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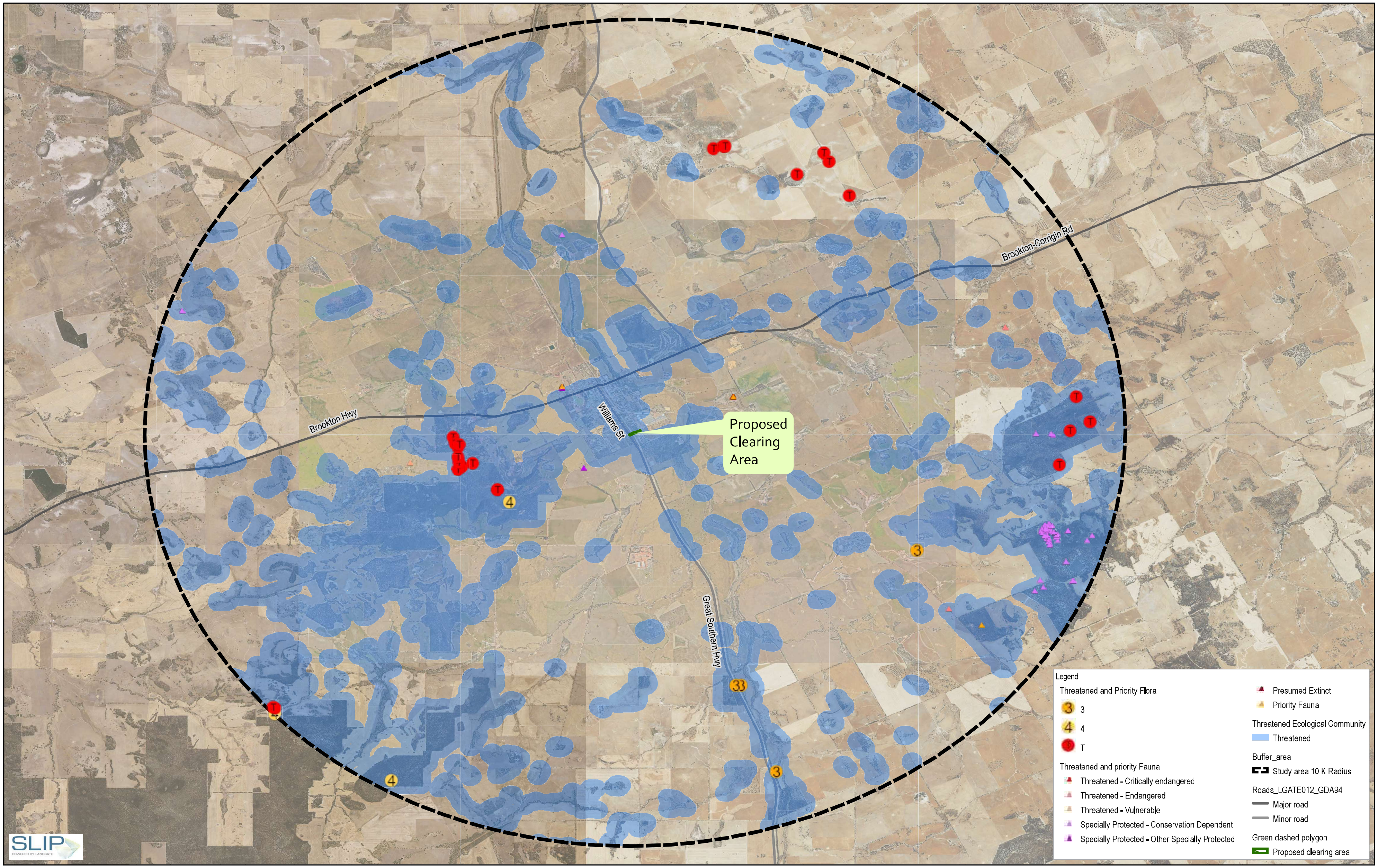

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Western Power
CBH Brookton

Project No. 12543894
Revision No. A
Date 27/01/2021

Threatened Ecological Communities

FIGURE 2

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Attachment 1 – Arc Infrastructure Approval

Government of **Western Australia**
Public Transport Authority

Your ref:
Our ref: PTA05402/20
[redacted]

2 September 2020

[redacted]

By email: [redacted]

Dear Tony,

I refer to your application received at the Public Transport Authority on 3 June 2020 to enter the Avon to Albany Corridor Line (31) at the 106.43 kilometre mark in Brookton.

The access is required for the removal of overhead conductors between poles S537529 and S537526, the removal of pole S978797 and the installation of 2 x 160mm polypipes containing 1 x 185mm2 XLPE HV cable and 1 x spare.

Your application has been approved subject to compliance with the attached conditions.

Please arrange for the attached Acknowledgment and Acceptance of Technical Conditions form to be signed as acceptance of these conditions and return the form to us. Until the signed copy of the acknowledgment and acceptance of conditions has been received the proposed works will not be approved to proceed.

Any breach of these conditions may cause the approval to be revoked. If approval is revoked, Section 47 (2) of the Rail Freight System Act allows the right to remove whatever has been constructed on Corridor Land.

The application will remain current until 31 August 2021, after which a new application may be required.

Please refer any general queries to Andrew Grero, Land and Corridor Officer, on (08) 9326 2374.

Yours sincerely

[redacted]

MANAGING DIRECTOR

Public Transport Centre, West Parade, Perth, Western Australia 6000
PO Box 8125, Perth Business Centre, Western Australia 6849
www.pta.wa.gov.au
ABN - 61 850 109 576