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24 May 2021

Department of Water and Environmental Regulation
Locked Bag 10
JOONDALUP WA 6919

Dear Sir/Madam,

RE: Forrestdale Business Park West – Clearing Permit Application for the corner of Southern River Road and Ranford Road

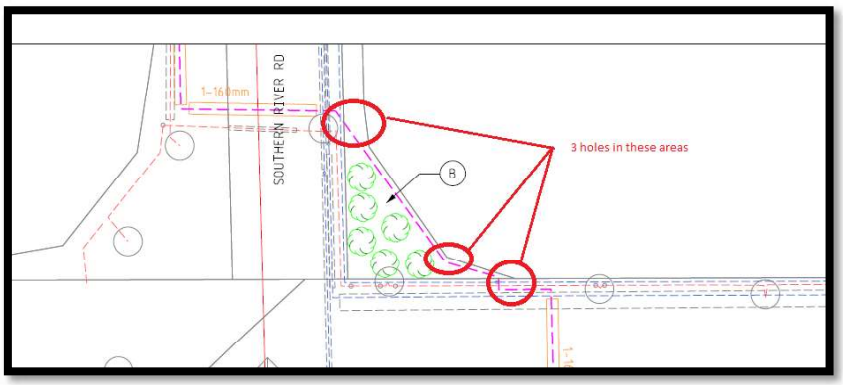
On behalf of DevelopmentWA please find attached a Clearing Permit application to clear 475m^2 of vegetation that includes some native species on the corner of Southern River Road and Ranford Road, within the Southern River Road Reserve (Figure 1). The land is under the management of the City of Gosnells and a letter of authority to apply for the clearing is provided as Attachment 1.

1 Background

Western Power is planning to install a High Voltage feeder cable from the Southern River Sub Station to Forrestdale Business Park West. The feeder cable will be installed underground which requires the excavation of small trenches in some locations in order to feed the cable around corners. One such location, at the south-east corner of the intersection of Southern River Road and Ranford Road in Canning Vale has some native vegetation in the area of three proposed trenches.

Three trenches are proposed to be excavated in the area as shown in Plate 1. The middle bend in the diagonal fence line shown in the diagram was not apparent on the site. It is possible that the underground cable does not follow the fenceline exactly.

Plate 1: Trench Locations



The digging of the trenches will require the use of large machinery that may not be able to avoid the native vegetation on the site so DevelopmentWA is seeking a Clearing Permit over the entire corner to ensure that the appropriate approvals have been gained for any native vegetation that may be cleared during works.

2 Site History

Examination of historic aerial photographs reveals that the road reserve in this location was completely cleared in late 2015 as part of earthworks for the duplication of Southern River Road (Plate 2). The 2017 aerial photo shows that the area appears to have been landscaped (Plate 3). Two small trees can be seen very close to the fenceline, with one that appears to be right at the southern bend in the fence.

Plate 2: Aerial Photograph September 2015

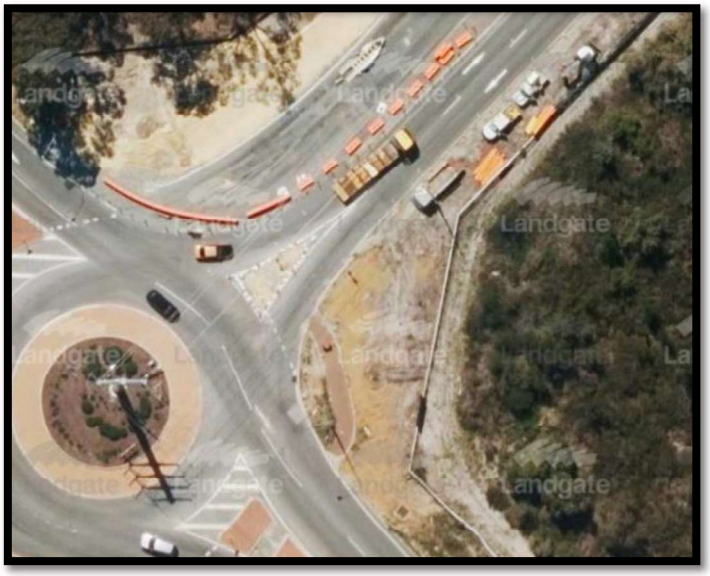
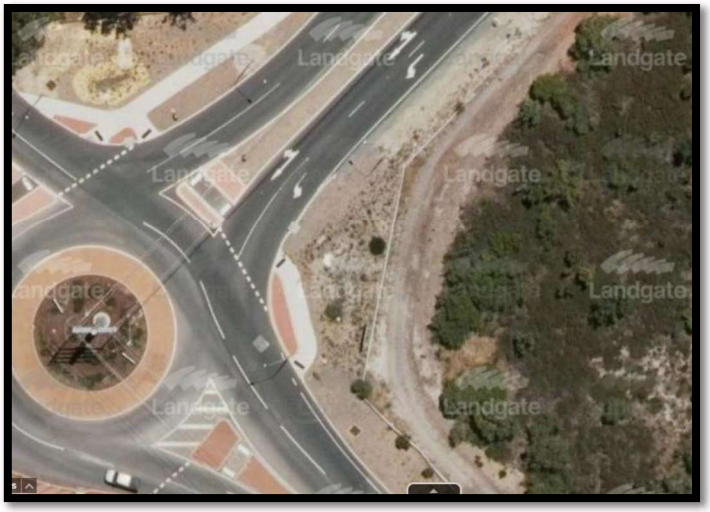
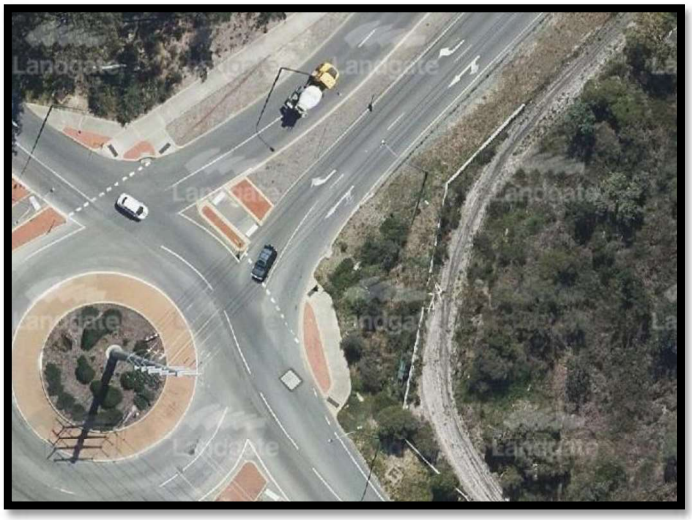


Plate 3: Aerial Photograph February 2017



Vegetation cover in the area increased since 2017 as shown in the aerial from October 2020 (Plate 4).

Plate 4: Aerial Photograph October 2020



3 Previous Clearing Permit

The clearing of the site in 2015 for the Southern River duplication road works was authorised under a Clearing Permit (CPS 6069/3). The Clearing Permit expired in June 2019. The clearing of regrowth vegetation of less than 20 years old is permissible without a clearing permit if the regrowth is on land that has been used for cultivation, pasture or forestry. These land uses do not apply to the area. Therefore, we are assuming that re-growth on previously cleared land is not exempt from a further permit.

4 Vegetation

PGV Environmental assessed the area on 17 May 2021. The vegetation in the area was a mix of weed species, planted ground cover (*Hemiandra pungens*) and some regrowth native vegetation.

Weed species were mostly African Lovegrass (*Eragrostis curvula*) and Couch Grass (*Cynodon dactylon*) with some Flatweed (*Hypochaeris glabra*) and Geraldton Carnation Weed (*Euphorbia terracina*) (Plate 5). The introduced weedy shrub *Acacia longifolia* is also present.

Plate 5: Weeds in the northern part of the area

Some native plants have regrown in the area, mostly young Flooded Gum saplings (*Eucalyptus rudis*) and *Jacksonia furcellata* and *Kunzea glabrescens* shrubs (Plate 6). The shrub at the southern fence corner seen in the 2017 aerial photograph is a native Paperbark (*Melaleuca preissiana*) about 4m high (Plate 7).

Plate 6: Regrowth native Flooded Gum and Jacksonia furcellata

Plate 7: Paperbark on the southern fence line

5 Ten Clearing Permit 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 (a): Vegetation should not be cleared if it comprises a high level of biological diversity.

The vegetation on the site is Completely Degraded being previously clearing. There are very few native plants with most of the site being planted or weeds. The vegetation is not representative of a TEC or a PEC. The proposed clearing is not considered at variance to this principle.

Principle (b): 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 is in poor condition with high levels of disturbance on the corner of two major roads. The site does not contain habitat for Threatened or Priority species. The proposed clearing is not considered at variance to this principle.

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

No Threatened or Priority plant species are likely to occur on the site given the recent clearing and high levels of disturbance. Therefore, the proposed clearing is not considered at variance to this principle.

Principle (d): 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 considered at variance to this principle.

Principle (e): 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. The proposed clearing is not considered at variance to this principle.

Principle (f): 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 permanent, perennial wetland or watercourses mapped on the site. The proposed clearing is not considered at variance to this principle.

Principle (g): 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. The area of clearing is mapped within the Bassendean System

The area of clearing is largely mapped within the Bassendean B1 Phase soil type, which is described as extremely low to very low relief dunes, undulating sandplain and discrete sand rises with deep bleached grey sands sometimes with a pale yellow B horizon or a weak iron-organic hardpan at depths generally greater than 2 m.

Land Degradation Risk Category Bassendean B1 Phase

Water Erosion	<3% of map unit has a high to extreme water erosion risk
Wind Erosion	50-70% of map unit has a high to extreme wind erosion risk
Waterlogging	3-10% of map unit has a moderate to very high waterlogging risk
Flooding	<3% of the map unit has a moderate to high flood risk
Salinity risk	<3% of map unit has a moderate to high salinity risk or is presently saline

The mapped soil unit has a 50-70% risk of wind erosion which may indicate that appropriate dust management measures will be required during the works which mitigates the risk to the surrounding area. The area will be stabilised after clearing to avoid any dust blowing off the site. The proposed clearing area is generally not susceptible to water erosion, waterlogging, flooding or risk of salinity, therefore the proposed clearing is not likely to cause appreciable land degradation. The proposed clearing is not considered to be at variance to this principle

Principle (h): 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 site is adjacent to Bush Forever Site 413, Balannup Lake and Adjacent Bushland, Southern River. The proposed clearing is minimal, will have established hygiene protocols in place during clearing and will not be in the Bush Forever site. The proposed clearing is not considered at variance to this principle.

Principle (i): Vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.

There are no watercourses that intersect the application area. A small part of Balannup Lake Multiple Use Wetland (UFI 14404) is mapped on the edge of the site and over the constructed Ranford Road (Plate 8). The wetland is highly modified and the clearing will not further impact on the wetland values.

Plate 8: Wetland mapping

The proposed clearing is to excavate three small trenches to install an underground cable and then stabilise the site. The proposed clearing is not considered at variance to this principle.

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

The soil unit has a low risk of flooding and stormwater will be controlled by the existing road stormwater management system. The proposed clearing is not considered at variance to this principle.

6 Conclusion

Some native re-growth vegetation occurs close to the area of the three proposed trenches. The amount of native vegetation is very small, and was cleared 6 years ago under a previous, expired clearing permit. Assessment of the proposed clearing of 475m^2 containing some native vegetation required for the installation of the High Voltage feeder cable 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

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Accompanying Documentation

Form C2 Application for a Purpose Permit

Shapefiles in IBSA Format

Figures

Figure 1: Clearing Permit Area

Attachments

Attachment 1: City of Gosnells Letter of Authority