



# Clearing Permit Decision Report

## 1 Application details and outcome

### 1.1. Permit application details

|                               |   |
|-------------------------------|---|
| <b>Permit number:</b>         | CPS 9682/1  |
| <b>Permit type:</b>           | Area permit   |
| <b>Applicant name:</b>        | Absolute Timber Solutions on behalf of Razmoski Investments Pty Ltd |
| <b>Application received:</b>  | 4 April 2022  |
| <b>Application area:</b>      | 0.31 hectares of native vegetation (revised)                        |
| <b>Purpose of clearing:</b>   | Timber storage area   |
| <b>Method of clearing:</b>    | Mechanical  |
| <b>Property:</b>              | Lot 1 on Diagram 12751  |
| <b>Location (LGA area/s):</b> | City of Wanneroo  |
| <b>Localities (suburb/s):</b> | Neerabup  |

### 1.2. Description of clearing activities

The vegetation proposed to be cleared is contained within a single contiguous area (see Figure 1, Section 1.5). The application is to clear a 0.3-hectare area for to provide a vegetation free storage area that will store, and process rescued timber from clearing sites, along with other equipment/materials used by the organisation.

The size of the area and amount of clearing proposed was reduced from 2 hectares to 0.3 hectares during the assessment to reduce and avoid potential environmental impacts.

### 1.3. Decision on application

|                       |  |
|-----------------------|--|
| <b>Decision:</b>      | Refused  |
| <b>Decision date:</b> | 26 September 2024  |
| <b>Decision area:</b> | 0.31 hectares of native vegetation, as depicted in Section 1.5, below. |

### 1.4. Reasons for decision

This clearing permit application was submitted, accepted, assessed and determined in accordance with sections 51E and 51O of the *Environmental Protection Act 1986* (EP Act). The Department of Water and Environmental Regulation (DWER) advertised the application for 21 days and no submissions were received.

In making this decision, the Delegated Officer had regard for the:

- site characteristics (see Appendix B);
- relevant datasets (see Appendix);
- the findings of a detailed flora and vegetation survey and a black cockatoo habitat assessment;
- the clearing principles set out in Schedule 5 of the EP Act (see Appendix C); and
- relevant planning instruments and any other matters considered relevant to the assessment (see Section 3).

The department's assessment identified that the proposed clearing is likely to result in:

- the loss of 0.31 ha of native vegetation that supports high biodiversity in very good (Keighery, 1994) condition;
- the loss of 0.31 ha of native vegetation that is composed of high-quality foraging habitat for Carnaby's cockatoo and forest red-tailed black cockatoos within the Swan Coastal Plain;
- the loss of 0.31 ha of native vegetation that is part of a known black cockatoo roost;
- the potential introduction and spread of weeds and dieback into adjacent vegetation, which could impact the quality of the adjacent vegetation and its habitat values; and
- indirect impacts to the Critically Endangered '*Melaleuca huegelii* - *M. systema*' shrublands of limestone ridges (floristic community type 26a as originally described in Gibson et al. 1994) threatened ecological community.

In addition to the findings of the assessment listed above, the Delegated Officer also considered those aspects of the application which related to planning and other matters and the necessity of the proposed clearing. In particular:

- the development approval for the proposal, from the City of Wanneroo, was refused on 12 August 2024 (City of Wanneroo, 2024), and
- the construction of a timber storage facility is a private activity, for which a genuine and material public benefit has not been identified.

Having had regard to the above information, the Delegated Officer formed the view that, in this case and in the context of the relevant planning and other matters, the severity of the environmental impacts outweighed the necessity of the proposed clearing. Given this, the Delegated Officer determined that these environmental impacts were unacceptable, and it would not be appropriate to manage them through conditions on a clearing permit (including environmental offsets). The Delegated Officer therefore decided that, on balance, it would not be appropriate to grant a clearing permit and, accordingly, refused Absolute Timber Solutions on behalf of Razmoski Investments Pty Ltd's application.

1.5. Site map



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Figure 1. Map of the application area.

## 2 Legislative context

The clearing of native vegetation in Western Australia is regulated under the EP Act and the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* (Clearing Regulations).

In addition to the matters considered in accordance with section 51O of the EP Act (see Section 1.4), the Delegated Officer has also had regard to the objects and principles under section 4A of the EP Act, particularly:

- the precautionary principle
- the principle of intergenerational equity
- the principle of the conservation of biological diversity and ecological integrity.

Other legislation of relevance for this assessment include:

- *Biodiversity Conservation Act 2016* (WA) (BC Act)
- *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act)
- *Planning and Development Act 2005* (WA) (P&D Act)

The key guidance documents which inform this assessment are:

- *A guide to the assessment of applications to clear native vegetation* (DER, December 2013)
- *Procedure: Native vegetation clearing permits* (DWER, October 2019)
- Technical guidance – *Flora and Vegetation Surveys for Environmental Impact Assessment* (EPA, 2016)
- Technical guidance – *Terrestrial Fauna Surveys for Environmental Impact Assessment* (EPA, 2016)

## 3 Detailed assessment of application

### 3.1. Avoidance and mitigation measures

The Applicant advised that clearing cannot be avoided as the property is completely covered in native vegetation, however, advised that the location was selected to minimise the impacts to environmental values, including:

- selecting the site to be close to the property entry off Wattle Ave, removing the need for additional clearing for access and minimising fragmentation within the broader site,
- avoidance of the occurrence of the *Melaleuca huegelii* – *Melaleuca systema* threatened ecological community in the western portion property, and
- retaining the remaining 8.5 hectares of the overall site in a vegetated state.

During the assessment, it was identified that due to the environmental values within the application area, further avoidance and mitigation measures would be required. Following a request for further information, the proposed clearing area was reduced from 2 hectares to 0.31 hectares (Figure 2) (Perlustro Buildings, 2023).



**Figure 2.** Map of the original application area (outlined in green) and revised application area for CPS 9682/1 (cross-hatched blue).

After consideration of avoidance and mitigation measures, it was determined that significant residual impacts to black cockatoo habitat remained. While the applicant has indicated they are willing to provide an offset, no formal proposal for the revised application area has been received by the department.

### 3.2. Assessment of impacts on environmental values

In assessing the application, the Delegated Officer has had regard for the site characteristics (see Appendix B) and the extent to which the impacts of the proposed clearing present a risk to biological, conservation, or land and water resource values.

The assessment against the clearing principles (see Appendix C) identified that the impacts of the proposed clearing present a risk to fauna and adjacent vegetation, as set out below.

#### 3.2.1. Biological values (ecological communities) - Clearing Principles (a) and (d)

##### Assessment

The desktop assessment identified that the application area is mapped as the “Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain’ (Tuart woodlands) community which is a Priority 3 ecological community (PEC) in Western Australia and listed as a Critically Endangered threatened ecological community (TEC) under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The Conservation Advice for the Tuart TEC/PEC notes that structure of the community can vary greatly depending on factors such as rainfall, soil nutrients, landscape position, historical land use etc., but is generally characterised by an upper canopy of tuart, most commonly in woodlands or forests, but can occur in mallee formations (DoEE, 2019).

According to the results of a biological survey, two vegetation types were identified within Lot 1 (MBS, 2022):

- *Corymbia calophylla* and *Eucalyptus marginata* open woodland: An open woodland of *Corymbia calophylla* and *Eucalyptus marginata* trees over *Xanthorrhoea preissii* and mixed shrubland and an understorey of mixed native sedges and herbs including *Trachymene pilosa*, *Morelotia octandra* and *Panaetia lessonii*, and
- *Melaleuca systema* and *Banksia sessilis* open heath: An open heath of *Melaleuca systema* and *Banksia sessilis* shrubs with other mixed lower shrubs over an understorey of *Desmocladius flexuosus*, *Trachymene pilosa* and other mixed native herbs and grasses.

Based on the identified vegetation types, the vegetation within the application area is not likely to be representative of the Tuart Woodlands PEC/TEC given no tuart trees were identified within the property (MBS, 2022).

The survey did identify that the *M. systema* and *B. sessilis* open heath vegetation is representative of the ‘*Melaleuca huegelii* - *M. systema* shrublands of limestone ridges (floristic community type 26a as originally described in Gibson et al. 1994)’ (Melaleuca Shrublands) which is a critically endangered TEC under both the Western Australian *Biodiversity Conservation Act 2016* (BC Act) and the Commonwealth EPBC Act (MBS, 2022). This community has been recorded in the local area, with the nearest record being 0.27 km from the proposed clearing.

The application area is mapped entirely within the *C. calophylla* and *E. marginata* open woodland (See Appendix E) vegetation type meaning the proposed clearing will not result in the direct loss of the Melaleuca Shrubland TEC, however, may result in indirect impacts to this community. The proposed clearing occurs within approximately 40 m from the TEC. The Conservation Advice for this community states that habitat critical to the survival of the TEC includes areas of vegetation within 200 m of the community as they provide a buffer and/or linkage values (DCCEEW, 2023) and therefore, it is considered that the proposed clearing is composed of critical habitat for the Melaleuca Shrubland TEC.

The proposed clearing would likely result in the introduction and spread of weeds and dieback into the surrounding vegetation, impacting its quality and permanently reducing its the ability to act as a buffer for the TEC.

##### Conclusion

Based on the above assessment, the proposed clearing will result in impacts to critical habitat for the “*Melaleuca huegelii* - *M. systema* shrublands of limestone ridges (floristic community type 26a)” threatened ecological community.

#### 3.2.2. Biological values (fauna) - Clearing Principles (b)

##### Assessment

The desktop assessment identified 36 species of conservation significant fauna species within the local area composed of 17 birds, seven invertebrates, ten mammals and two reptiles. Many of the birds recorded are migratory marine species due to the proximity of the proposal to the coast.

A fauna assessment (MBS, 2022) found no evidence of threatened or priority fauna within the proposed clearing area, however; noted that the application area contains suitable habitat for several fauna species. Based on the

desktop assessment and fauna survey (MBS, 2022), the following fauna species are considered to have suitable habitat within the proposed clearing area:

- Carnaby's cockatoo (*Zanda latirostris*) (EN)
- Forest red-tailed black cockatoo (FRTBC) (*Calyptorhynchus banksii naso*) (VU)
- Heath mouse (*Pseudomys shortridgei*) (VU)
- Quenda (*Isodon fusciventer*) (P4)

### **Black cockatoos**

According to available mapping, the proposed clearing is located within the known distribution of Carnaby's cockatoo, however, is very close to the known breeding distribution and is mapped just outside of the vagrant distribution for the forest red-tailed black cockatoo (FRTBC). In the context of the application area, there are two records of Carnaby's cockatoos directly adjacent to the proposed clearing (approximately 3.93 m away) and the nearest FRTBC record is approximately 4.69 km away.

#### Breeding habitat

Suitable breeding habitat for black cockatoos includes trees which either have a suitable nest hollow or are of a suitable diameter at breast height (DBH) to develop a nest hollow (DAWE, 2022). The proposed clearing is located on the Swan Coastal Plain, which is primarily used for foraging habitat, with some patches of breeding (DAWE, 2022). According to available databases, there are 10 known breeding sites within the local area, the nearest being 7.62 km from the proposed clearing.

Habitat trees considered potentially suitable for Black Cockatoo breeding have a DBH greater than 500 millimetres. The survey identified a total of 55 trees with a DBH of 500 mm or greater within Lot 1 (MBS, 2022). The original two-hectare application area would have resulted in the removal of 21 trees, 10 of which contained hollows suitable for breeding (but with no evidence of current or past breeding). The revised clearing footprint would result in the removal of one marri with a suitable DBH but no hollows (MBS, 2022).

Given the above, the proposed clearing is not likely to have a significant impact on the availability of breeding habitat for black cockatoos.

#### Roosting habitat

Night-roosts are usually located in the tallest trees of an area, and near both a food supply and a water source (DAWE, 2022). The proposed clearing is directly adjacent to a mapped black cockatoo roosting site (less than 10 m), which, given the distance, includes vegetation within the proposed clearing area. In total, there are 35 known roosting sites mapped in the local area.

The fauna survey did not record any evidence of roosting within Lot 1 (MBS, 2022), however, given that roosting has been previously recorded on the property and that jarrah and marri are both key roosting species for both Carnaby's cockatoo and FRTBC (DAWE, 2022), it is considered likely that the site would be used again in the future and the proposed clearing would result in the loss of a known black cockatoo roost.

#### Foraging habitat

Foraging habitat differs between the three species of black cockatoos; however, marri is a key foraging species for both Carnaby's cockatoo and FRTBC and jarrah is a key foraging resource for FRTBC (DAWE, 2022).

Food resources within the range of roosting and breeding sites are important to sustain populations of black cockatoos, and foraging resources should therefore be viewed in the context of the proximity to the known night roosting and breeding sites to the application area. Black cockatoos will generally forage up to 12 km from an active breeding site. Following breeding, they will flock in search of food, usually within six kilometres of a night roost (DAWE, 2022). Given the large number of breeding and roosting sites recorded within the local area, it is considered likely that the proposed clearing area provides foraging habitat to both roosting and breeding populations.

The fauna survey did not identify any evidence of foraging by black cockatoos within Lot 1 (MBS, 2022) and noted that the lack of evidence may mean that the site may not be preferred foraging habitat. While there is no evidence of foraging within the site currently, this does not mean the trees will not be utilised in the future.

Since the proposed clearing is within the range of known roosting and breeding locations and the vegetation is composed of key foraging species in very good (Keighery, 1994) condition, it is considered that the proposed clearing would result in the loss of 0.31 hectares of high-quality foraging habitat for black cockatoos.

### Other species – ground-dwelling fauna

The heath mouse (*Pseudomys shortridgei*) is a small rodent currently found restricted to a small number of locations in the south-west of Western Australia (TSSC, 2016). In Western Australia, the heath mouse has been found mostly in species-rich heath and mixed scrub and mallee (TSSC, 2016). According to available databases, there are two records of the species in the local area, the nearest being 3.78 km from the proposed clearing. Given that the proposed clearing is composed of jarrah and marri woodland, it is considered not likely that the proposed clearing area contains suitable habitat for the heath mouse, but the nearby TEC may contain suitable habitat.

Quenda (*Isoodon fusciventer*) are a small ground dwelling marsupial endemic to the South West of Western Australia. Quenda require a dense understorey for cover and are often found digging in leaf litter for invertebrates, earthworms, beetles and plant material, generally inhabiting dense understorey vegetation of forests, woodlands, shrubland and heathland (DBCA, 2017). According to available databases, there are 112 records of quenda in the local area, the nearest being 2.80 km from the proposed clearing. Given the vegetation contains jarrah and marri woodland, it is considered likely to contain suitable habitat for the quenda.

### Conclusion

Based on the above assessment, the proposed clearing will result in the loss of 0.31 ha of high-quality foraging habitat and a known roosting site for black cockatoos, and the loss of 0.31 ha of suitable habitat for quenda.

## 3.3. Relevant planning instruments and other matters

### Development Approval

The City of Wanneroo (the City) advised that local government approvals are required for the purpose of the proposed clearing (City of Wanneroo, 2022). The City advised that the original clearing footprint of 2 hectares was not supported and noted at the time that no development approval application had been received, however did advise (City of Wanneroo, 2022):

- the application is mapped within the Cottesloe Complex – Central and South vegetation complex which is a high priority for conservation by the City as stated in their Local Biodiversity Plan 2018/19 – 2023/24, and
- the property had been identified for future conservation under the Neerabup Industrial Area Structure Plan No. 17 and the proposal would require sufficient details as to how they were intending to mitigate environmental impacts.

The applicant advised again on 15 January 2024 that a Development Application to the City had been submitted (Perlustro Buildings, 2024) for the proposal. The City of Wanneroo advised on 14 March 2024 that the Department of Fire and Emergency Services (DFES) raised concerns regarding complying with bushfire attack level (BAL) requirements which would require a larger clearing footprint the currently proposed under the clearing application (City of Wanneroo, 2024a).

The City determined to refuse Absolute Timber Solutions Development Application on 12 August 2024, citing the following reasons for the decision (City of Wanneroo, 2024b):

- The proposal is inconsistent with the Neerabup Industrial Area Approved Structure Plan No. 17 which indicates that the property with the proposed clearing is subject to future planning as a potential conservation area;
- Given there is no framework at the structure plan level, a stand-alone application which involves the removal of vegetation is not consistent with orderly and proper planning; and
- Additional clearing would be required to comply with relevant bushfire regulations which is not supported by the City given the significant environmental values of the vegetation.

It is understood that the applicant intends to appeal the City's decision to the State Administrative Tribunal (SAT).

### EPBC Act Referral

On 28 September 2022 Absolute Timber Solutions referred their proposal to the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) under the EPBC Act (Reference: EPBC 2022/09367). DCCEEW determined that the proposed clearing was a Controlled Action due to the potential impacts to the Carnaby's cockatoo which is a Matter of National Environmental Significance.

Following the revision of the application area from 2 hectares to 0.31 hectares, the referral was withdrawn as the Applicant determined that the reduced area no longer required assessment under the EPBC Act.

### Aboriginal Heritage

No Aboriginal sites of significance have been mapped within the application area. It is the permit holder's responsibility to comply with the *Aboriginal Heritage Act 1972 (WA)* and ensure that no Aboriginal Sites of Significance are damaged through the clearing process.

#### **4 Suitability of offsets**

It is acknowledged that the applicant indicated a willingness to provide offsets, however, the Delegated Officer determined that given the rationale for the refusal of this permit, an offset would not influence the outcome of the application and therefore is not appropriate.

**End**



## Appendix A. Additional information provided by applicant

| Summary of comments   | Consideration of comment  |
|---|---|
| Response to request for further information: <ul style="list-style-type: none"> <li>- Avoidance and mitigation measures</li> <li>- Clarification on which trees contain suitable hollows for black cockatoos</li> </ul> | See Section 3.1. Avoidance and mitigation measures and Section 3.2.2. Biological values (fauna) |
| Revised application area  | See Section 3.1. Avoidance and Mitigation Measures  |
| Copy of Absolute Timber Solution's application for a Development Approval.  | See Section 3.3. Relevant instruments and other matters.  |

## Appendix B. Site characteristics

### B.1. Site characteristics

| Characteristic         | Details  |
|------------------------|--|
| Local context          | <p>The area proposed to be cleared is part of an expansive tract of native vegetation in the intensive land use zone of Western Australia. It is surrounded by remnant vegetation on three sides with a racetrack and related infrastructure to the east.</p> <p>Spatial data indicates the local area (10-kilometre radius from the centre of the area proposed to be cleared) retains approximately 38 per cent of the original native vegetation cover.</p>   |
| Ecological linkage     | There are two mapped ecological linkages 20 meters to the north of the application area, these are the Gnangara Mound Ecological Linkages and the Perth Regional Ecological Linkages.  |
| Conservation areas     | <p>There are 75 conservation areas mapped within the local area (10-kilometre radius), with 64 being Bush Forever sites. There are nine conservation areas recorded within one kilometre of the proposed clearing, namely:</p> <ul style="list-style-type: none"> <li>• Bush Forever Site 293 (Shire View Hill and Adjacent Bushland) – 0.08 km</li> <li>• Gnangara-Moore River State Forest – 0.08 km</li> <li>• Bush Forever Sites 139, 140, 444, 446, 455 and 457 (State Fores 65 – Pinjar Plantation South Bushland) – 0.83 km, 0.90 km, 0.72 km, 0.57 km, 0.39 km and 0.31 km respectively.</li> </ul>  |
| Vegetation description | <p>Vegetation survey (MBS, 2022) indicate the vegetation within the proposed clearing area consists of <i>Corymbia calophylla</i> and <i>Eucalyptus marginata</i> trees over <i>Xanthorrhoea preissii</i> and mixed shrubland and an understorey of mixed native sedges and herbs including <i>Trachymene pilosa</i>, <i>Morelotia octandra</i> and <i>Panaetia lessonii</i>.</p> <p>The full survey descriptions and maps are available in Appendix E.</p> <p>This is consistent with the mapped vegetation type(s):</p> <ul style="list-style-type: none"> <li>• Cottesloe Complex-Central and South, which is described as Mosaic of woodland of <i>Eucalyptus gomphocephala</i> (Tuart) and open forest of <i>Eucalyptus gomphocephala</i> (Tuart) - <i>Eucalyptus marginata</i> (Jarrah) - <i>Corymbia calophylla</i> (Marri); closed heath on the Limestone outcrops.</li> </ul> <p>The mapped vegetation type retains approximately 32 per cent of the original extent (Government of Western Australia, 2019).</p> |
| Vegetation condition   | <p>Vegetation survey (MBS, 2022) indicate the vegetation within the proposed clearing area is in very degraded to excellent (Keighery, 1994) condition.</p> <p>The full Keighery (1994) condition rating scale is provided in Appendix D.</p> <p>The full survey descriptions and mapping are available in Appendix E.</p>   |
| Climate and landform   | <p>The proposed clearing is in Neerabup which is a northern suburb of Perth. The Perth Region has a subtropical climate with warm summers and cold winters. Perth has an annual average maximum temperature of 24.9 degrees Celsius and 722.4 mm of rainfall.</p> <p>Landform of the proposed clearing area is described as undulating dunes.</p>  |

| Characteristic         | Details  |
|------------------------|--|
| Soil description       | The soil within the proposed clearing is mapped as the Karrakatta Sand Yellow Phase, which is described as low hilly to gently undulating terrain. Yellow sand over limestone at 1-2 m. <i>Banksia</i> spp. woodland with scattered emergent <i>E. gomphocephala</i> and <i>E. marginata</i> and a dense shrub layer.  |
| Land degradation risk  | The mapped soil types have a low risk for most forms of land degradation but have a high risk of wind erosion.   |
| Waterbodies            | The desktop assessment and aerial imagery indicated that the closest waterbody to the application area is mapped as Lake Pinjar and is approximately 1.75 kilometres east of the application area.   |
| Hydrogeography         | The application area is within the Wanneroo Groundwater Area as proclaimed under the RIWI Act.<br><br>The mapped groundwater salinity is <500 milligrams total dissolved solids per litre.   |
| Flora                  | According to available databases, there are 90 records across 33 of conservation significant flora species recorded within the local area, nine of which are threatened species. None of the records were found within one kilometre of the proposed clearing, with the nearest record being a <i>Eucalyptus argutifolia</i> (T).<br>According to the Biological Survey (MBS Environmental, 2022), no conservation significant flora was recorded within the proposed clearing area.   |
| Ecological communities | There are five threatened and priority ecological communities mapped within the local area (10-kilometre radius). The proposed clearing is mapped within the “Tuart ( <i>Eucalyptus gomphocephala</i> ) woodlands and forests of the Swan Coastal Plain” listed as Priority 3 in Western Australia and Critically Endangered under the EPBC Act.<br><br>The proposed clearing is also mapped near the “ <i>Melaleuca huegelii</i> - <i>M. systema</i> shrublands of limestone ridges (floristic community type 26a as originally described in Gibson et al. 1994)” ecological community which is listed as Critically Endangered under both the BC Act and EPBC Act, located approximately 0.27 km from the application. |
| Fauna                  | According to available databases, there are 1001 records across 36 species of conservation significant fauna within the local area (10-kilometre radius). One species is recorded directly adjacent to the proposed clearing area, the Carnaby’s cockatoo ( <i>Zanda latirostris</i> ) (EN). There are no other records within one kilometre of the proposed clearing.<br><br>There are ten known black cockatoo breeding locations and 35 recorded roosts within the local area. The nearest breeding and roosting location are 7.62 km and >0.01 km respectively from the proposed clearing area.  |

## B.2. Fauna analysis table

| Species name   | Conservation status | Suitable habitat features? [Y/N] | Suitable vegetation type? [Y/N] | Distance of closest record to application area (km) | Number of known records (total) | Are surveys adequate to identify? [Y, N, N/A] |
|--|---------------------|----------------------------------|---------------------------------|---|---------------------------------|---|
| <i>Calyptorhynchus banksii naso</i> (forest red-tailed black cockatoo)       | VU                  | Y                                | Y                               | 4.69  | 3                               | Y   |
| <i>Isoodon fusciventer</i> (quenda, southwestern brown bandicoot)            | P4                  | Y                                | Y                               | 2.80  | 112                             | Y   |
| <i>Pseudomys shortridgei</i> (heath mouse, heath rat, dayang)                | VU                  | Y                                | Y                               | 3.78  | 2                               | Y   |
| <i>Zanda baudinii</i> (Baudin's cockatoo)                                    | EN                  | Y                                | Y                               | 6.63  | 3                               | Y   |
| <i>Zanda latirostris</i> (Carnaby's cockatoo)                                | EN                  | Y                                | Y                               | 3.93  | 597                             | Y   |
| <i>Zanda</i> sp. 'white-tailed black cockatoo' (white-tailed black cockatoo) | EN                  | Y                                | Y                               | 4.41  | 32                              | Y   |

T: threatened, CR: critically endangered, EN: endangered, VU: vulnerable, P: priority

**B.3. Ecological community analysis table**

| Community name  | Conservation status      | Suitable habitat features? [Y/N] | Suitable vegetation type? [Y/N] | Suitable soil type? [Y/N] | Distance of closest record to application area (km) | Number of known records (total) | Are surveys adequate to identify? [Y, N, N/A] |
|---|--------------------------|----------------------------------|---------------------------------|---------------------------|---|---------------------------------|---|
| <i>Melaleuca huegelii</i> - <i>M. systema</i> shrublands of limestone ridges (floristic community type 26a as originally described in Gibson et al. 1994) | CR (BC Act and EPBC Act) | N                                | N                               | N                         | 0.27  | 13                              | Y   |
| Tuart ( <i>Eucalyptus gomphocephala</i> ) woodlands and forests of the Swan Coastal Plain   | P3 (WA) CR (EPBC Act)    | N                                | N                               | N                         | 0   | 24                              | Y   |

T: threatened, CR: critically endangered, EN: endangered, VU: vulnerable, P: priority

**Appendix C. Assessment against the clearing principles**

| Assessment against the clearing principles   | Variance level               | Is further consideration required?                         |
|--|------------------------------|--|
| <b>Environmental value: biological values</b>  |                              |  |
| <p><u>Principle (a):</u> "Native vegetation should not be cleared if it comprises a high level of biodiversity."</p> <p><u>Assessment:</u><br/>The proposed clearing area is mapped within the "Tuart (<i>Eucalyptus gomphocephala</i>) woodlands and forests of the Swan Coastal Plain" Priority 3 ecological community (PEC), however, the biological survey (MBS Environmental, 2022) notes that no tuart trees are recorded within the vegetation.</p> <p>The vegetation within the proposed clearing area is in very good (Keighery, 1994) condition (MBS, 2022) which acts as a buffer to the nearby recorded critically endangered '<i>Melaleuca huegelii</i> - <i>M. systema</i> shrublands of limestone ridges (floristic community type 26a as originally described in Gibson et al. 1994)' threatened ecological community and is composed of high-quality foraging habitat for threatened black cockatoos.</p> | At variance                  | Yes<br><br><i>Refer to Section 3.2.1 and 3.2.2, above.</i> |
| <p><u>Principle (b):</u> "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."</p> <p><u>Assessment:</u><br/>The proposed clearing area contains significant foraging and roosting habitat for black cockatoos and provides suitable habitat for many conservation significant fauna that occur within the local area.</p>  | At variance                  | Yes<br><br><i>Refer to Section 3.2.2, above.</i>           |
| <p><u>Principle (c):</u> "Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora."</p> <p><u>Assessment:</u><br/>While there are several threatened flora species within the local area, the biological survey did not identify any threatened flora within the proposed clearing (MBS, 2022).</p> <p>The nearest record, <i>Eucalyptus argutifolia</i> (T) is a large mallee and it is expected that if it was within the proposed clearing area, it would have been identified (MBS, 2022).</p>  | Not likely to be at variance | No   |

| Assessment against the clearing principles  | Variance level               | Is further consideration required?           |
|---|------------------------------|--|
| <p><u>Principle (d):</u> <i>“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.”</i></p> <p><u>Assessment:</u><br/>The proposed clearing area is mapped within the “Tuart (<i>Eucalyptus gomphocephala</i>) woodlands and forests of the Swan Coastal Plain” threatened ecological community (TEC) listed as critically endangered under the EPBC Act, however, the biological survey (MBS Environmental, 2022) notes that no tuart trees are recorded within the vegetation.</p> <p>In addition, the proposed clearing is mapped near the “<i>Melaleuca huegelii</i> - <i>M. systema</i> shrublands of limestone ridges (floristic community type 26a as originally described in Gibson et al. 1994)” TEC which is listed as Critically Endangered under both the BC Act and EPBC Act. The biological survey identified that the western portion of the property (outside of the application area) is representative of this TEC meaning the proposed clearing may have indirect impacts on the community.</p> | May be at variance           | Yes<br><i>Refer to Section 3.2.1, above.</i> |
| <b>Environmental value: significant remnant vegetation and conservation areas</b>   |                              |  |
| <p><u>Principle (e):</u> <i>“Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.”</i></p> <p><u>Assessment:</u><br/>The extent of the mapped vegetation type and native vegetation in the local area is consistent with the national objectives and targets for biodiversity conservation in Australia within a constrained area where a 10 per cent retention target is applied.</p>  | Not likely to be at variance | No   |
| <p><u>Principle (h):</u> <i>“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.”</i></p> <p><u>Assessment:</u><br/>While there are many conservation areas near the proposed clearing, they are currently separated from the proposed clearing by roads or other infrastructure, and given the small size of the application area, the proposed clearing is not likely to have a significant impact on nearby conservation areas.</p>   | Not likely to be at variance | No   |
| <b>Environmental value: land and water resources</b>  |                              |  |
| <p><u>Principle (f):</u> <i>“Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.”</i></p> <p><u>Assessment:</u><br/>Given that the nearest water courses or wetlands are recorded 1.7 km from the application area, the proposed clearing is unlikely to impact on- or off-site hydrology and water quality.</p>  | Not likely to be at variance | No   |
| <p><u>Principle (g):</u> <i>“Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.”</i></p> <p><u>Assessment:</u><br/>The mapped soils are highly susceptible to wind erosion. Noting the small size of the application area and that the surrounding areas are largely still densely vegetated; the proposed clearing is not likely to have an appreciable impact on land degradation.</p>  | Not likely to be at variance | No   |

| Assessment against the clearing principles   | Variance level               | Is further consideration required? |
|--|------------------------------|------------------------------------|
| <p><u>Principle (i):</u> “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.”</p> <p><u>Assessment:</u><br/>Given that the nearest water courses or wetlands are recorded 1.7 km from the application area, the proposed clearing is unlikely to impact on- or off-site hydrology and water quality.</p>   | Not likely to be at variance | No                                 |
| <p><u>Principle (j):</u> “Native vegetation should not be cleared if the clearing of the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.”</p> <p><u>Assessment:</u><br/>Given that no watercourses or wetlands are located within application area and that the soils are not mapped for high risk of flooding or waterlogging, the proposed clearing is not likely to contribute to increased incidence or intensity of flooding.</p> | Not likely to be at variance | No                                 |

**Appendix D. Vegetation condition rating scale**

Vegetation condition is a rating given to a defined area of vegetation to categorise and rank disturbance related to human activities. The rating refers to the degree of change in the vegetation structure, density and species present in relation to undisturbed vegetation of the same type. The degree of disturbance impacts upon the vegetation’s ability to regenerate. Disturbance at a site can be a cumulative effect from a number of interacting disturbance types.

Considering its location, the scale below was used to measure the condition of the vegetation proposed to be cleared. This scale has been extracted from Keighery, B.J. (1994) *Bushland Plant Survey: A Guide to Plant Community Survey for the Community*. Wildflower Society of WA (Inc). Nedlands, Western Australia.

**Measuring vegetation condition for the South West and Interzone Botanical Province (Keighery, 1994)**

| Condition           | Description  |
|---------------------|--|
| Pristine            | Pristine or nearly so, no obvious signs of disturbance.  |
| Excellent           | Vegetation structure intact, with disturbance affecting individual species; weeds are non-aggressive species.  |
| Very good           | Vegetation structure altered, with obvious signs of disturbance. For example, disturbance to vegetation structure caused by repeated fires, the presence of some more aggressive weeds, dieback, logging and/or grazing.   |
| Good                | Vegetation structure significantly altered by very obvious signs of multiple disturbances. Retains basic vegetation structure or ability to regenerate it. For example, disturbance to vegetation structure caused by very frequent fires, the presence of some very aggressive weeds at high density, partial clearing, dieback and/or grazing. |
| Degraded            | Basic vegetation structure severely impacted by disturbance. Scope for regeneration but not to a state approaching good condition without intensive management. For example, disturbance to vegetation structure caused by very frequent fires, the presence of very aggressive weeds, partial clearing, dieback and/or grazing.                 |
| Completely degraded | The structure of the vegetation is no longer intact and the area is completely or almost completely without native species. These areas are often described as ‘parkland cleared’ with the flora comprising weed or crop species with isolated native trees or shrubs.   |

**Appendix E. Biological survey information excerpts (MBS Environmental, 2022)**

| Vegetation Type  | Description  | Photograph  |
|--|--|---|
| <i>Corymbia calophylla</i> and <i>Eucalyptus marginata</i> Open Woodland | An open woodland of <i>Corymbia calophylla</i> and <i>Eucalyptus marginata</i> trees over <i>Xanthorrhoea preissii</i> and mixed shrubland and an understorey of mixed native sedges and herbs including <i>Trachymene pilosa</i> , <i>Morelotia octandra</i> and <i>Panaetia lessonii</i> . |   |
| <i>Melaleuca systema</i> and <i>Banksia sessilis</i> Open Heath          | An open heath of <i>Melaleuca systema</i> and <i>Banksia sessilis</i> shrubs with other mixed lower shrubs over an understorey of <i>Desmocladus flexuosus</i> , <i>Trachymene pilosa</i> and other mixed native herbs and grasses.  |  |

**Figure 3.** Descriptions and photographs of the vegetation within Lot 1.

| Vegetation Condition               | Pristine | Excellent | Very Good | Good | Degraded | Completely Degraded | Total |
|------------------------------------|----------|-----------|-----------|------|----------|---------------------|-------|
| <b>Entire Site</b>                 |          |           |           |      |          |                     |       |
| Area (ha)                          | 0        | 3.2       | 3.7       | 0.5  | 0.2      | 1.2                 | 8.8   |
| Area (%)                           | 0        | 36.4      | 42        | 5.7  | 2.3      | 13.6                | 100   |
| <b>Proposed 2 ha Clearing Area</b> |          |           |           |      |          |                     |       |
| Area (ha)                          | 0        | 0.18      | 1.25      | 0.02 | 0.16     | 0.39                | 2.0   |
| Area (%)                           | 0        | 9         | 62.5      | 1    | 8        | 19.5                | 100   |

**Figure 4.** Vegetation condition within Lot 1 and the original 2 hectare clearing footprint.

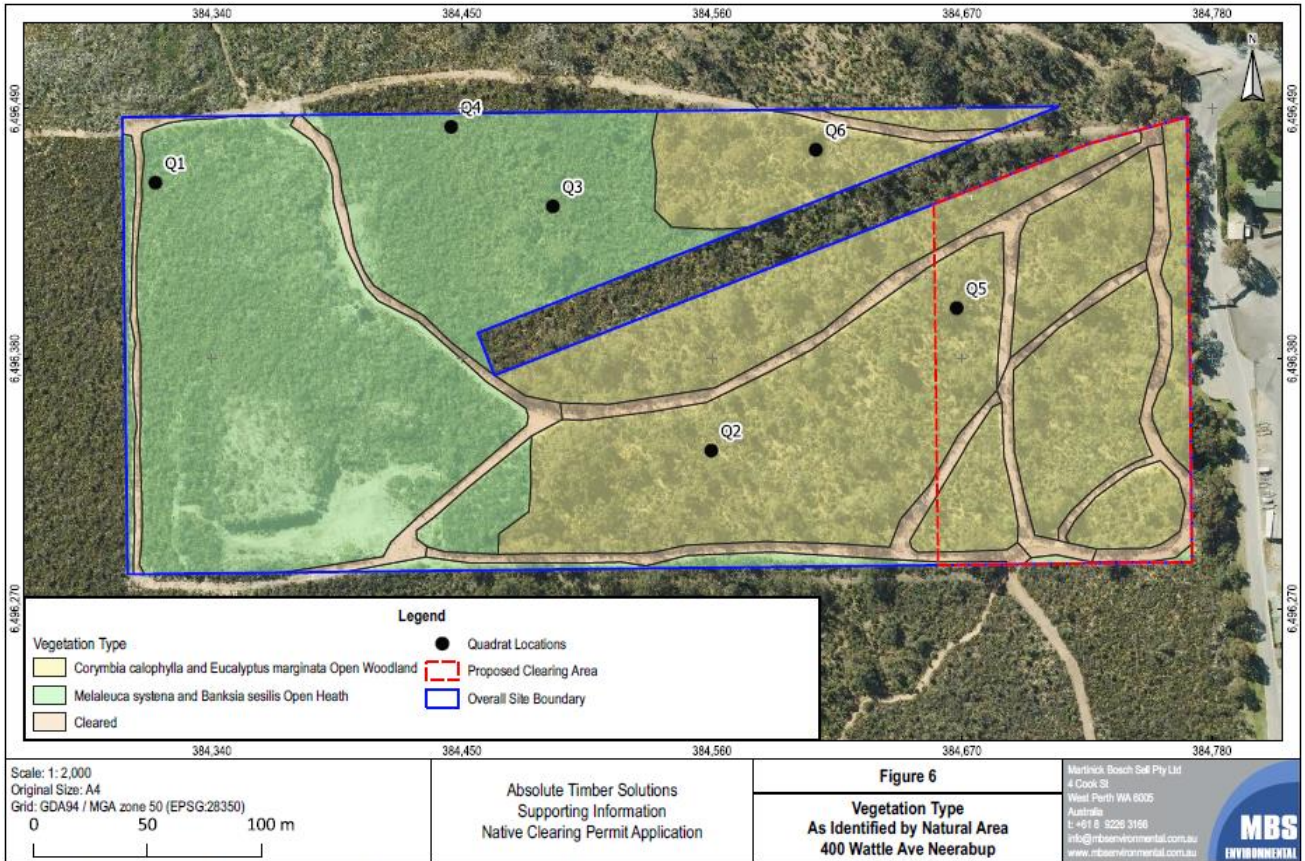


Figure 5. Mapped vegetation types within Lot 1.

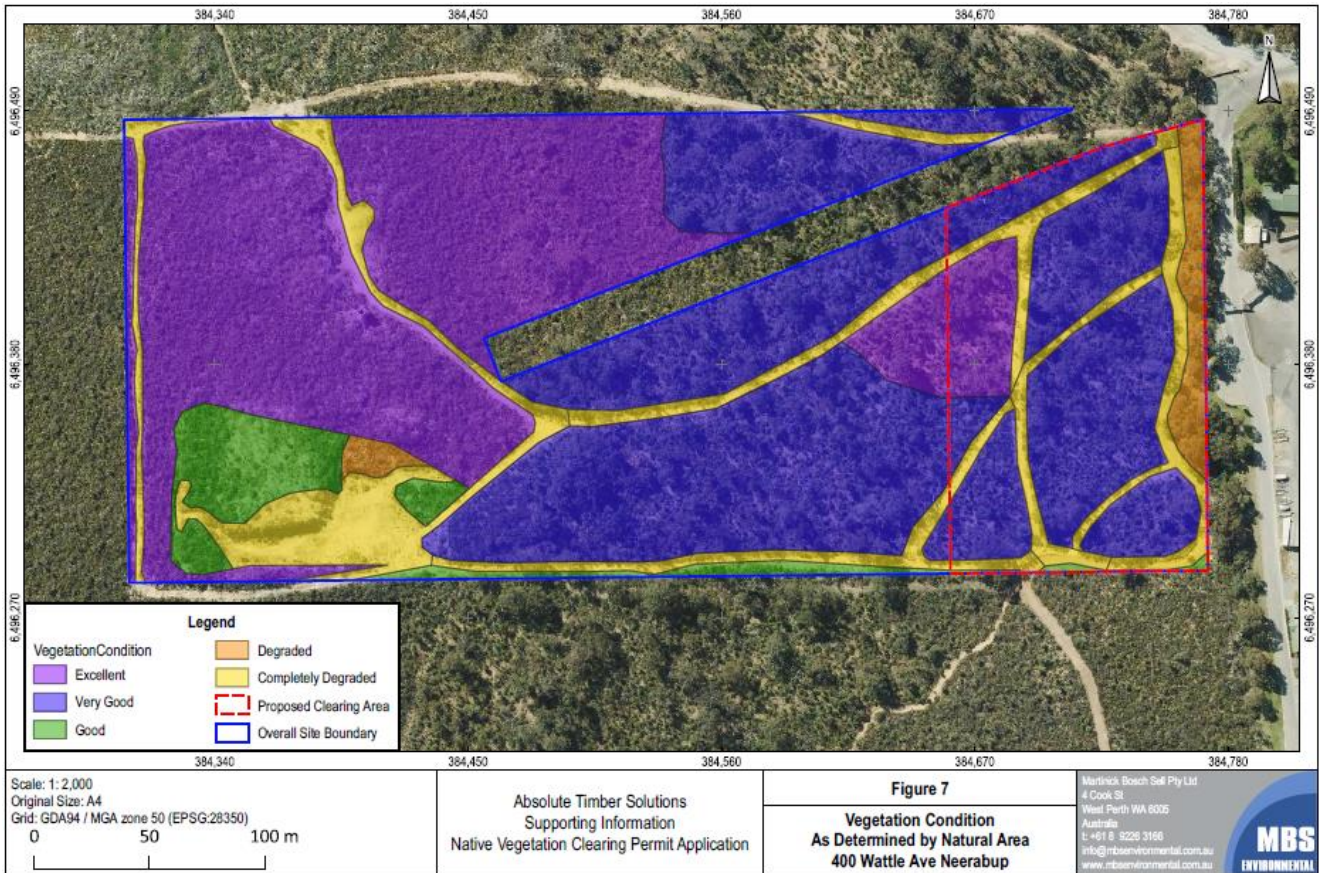


Figure 6. Map of the vegetation condition (Keighery, 1994) within Lot 1.

| Vegetation Type  | Characteristics of SCP26a  | Comments   | Meet Criteria of TEC                                    |
|--|--|--|---|
| <i>Melaleuca systema</i> and <i>Banksia sessilis</i><br>Open Heath | Occurs on massive limestone ridges mainly around Yanchep and south of Perth near Lake Clifton.   | Vegetation type found on limestone ridges towards Yanchep north of Perth.  | Yes, meets main diagnostic characteristics for the TEC. |
|  | Occurs within the Swan DBCA region.  | Site found within the Swan DBCA region.  |   |
|  | Occurs on limestone ridges associated with Tamala limestone within the Cottesloe, Karrakatta soils of the Spearwood dune systems.        | Occurs on Karrakatta soils.  |   |
|  | Species rich thickets, heaths and scrubs dominated by <i>Melaleuca huegelii</i> , <i>Melaleuca systema</i> and <i>Banksia sessilis</i> . | Vegetation type present is dominated by <i>Melaleuca systema</i> and <i>Banksia sessilis</i> with <i>Melaleuca huegelii</i> present. |   |
|  | Common understorey includes <i>Grevillea preissii</i> and <i>Acacia lasiocarpa</i> .   | <i>Grevillea preissii</i> not found on site but <i>Acacia lasiocarpa</i> was common on site.   |   |

Figure 7. Assessment of the vegetation against the criteria for the Melaleuca Shrubland TEC.

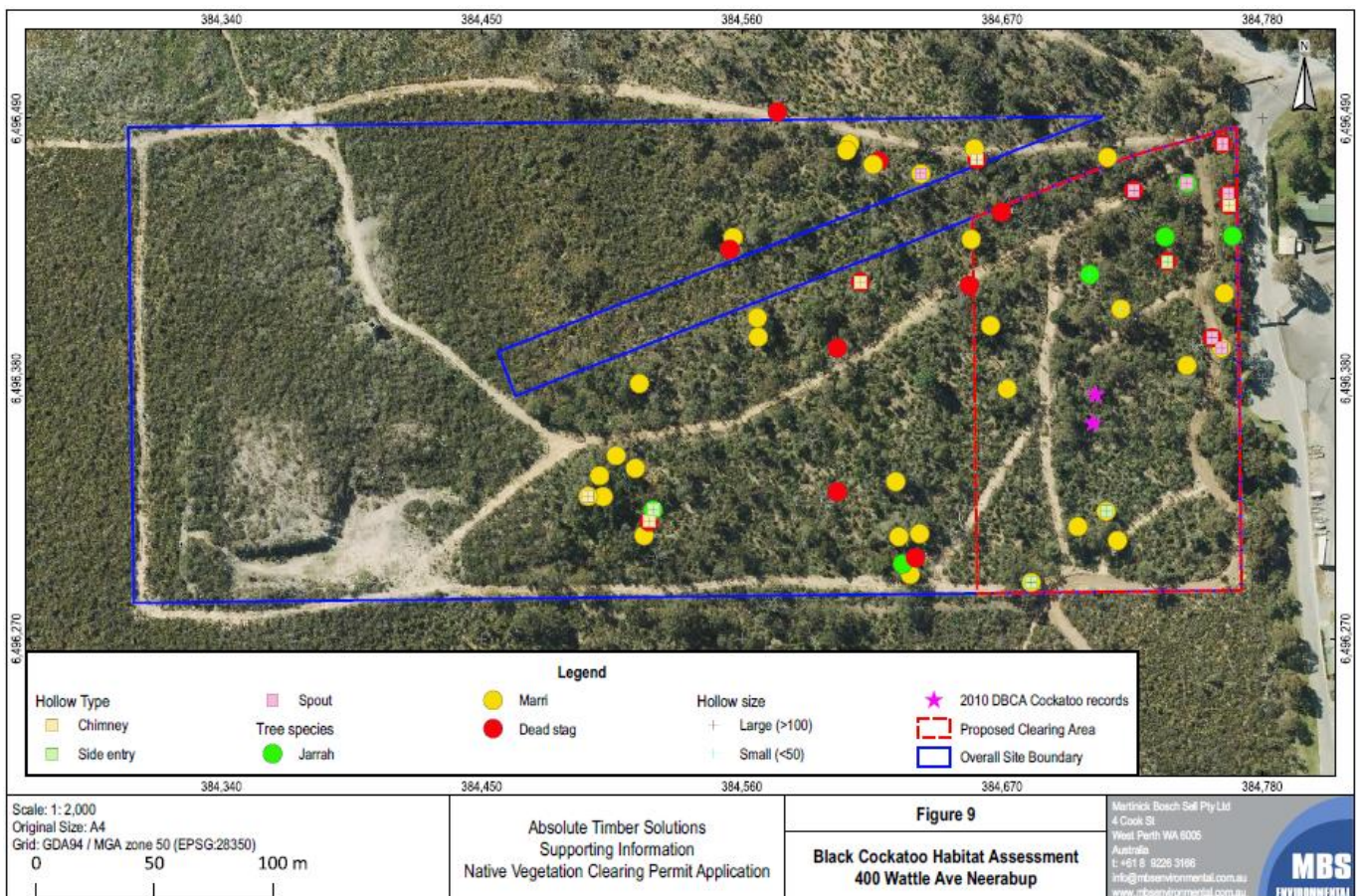


Figure 8. Map of suitable habitat trees identified within Lot 1.



## Appendix F. Sources of information

### F.1. GIS databases

Publicly available GIS Databases used (sourced from [www.data.wa.gov.au](http://www.data.wa.gov.au)):

- 10 Metre Contours (DPIRD-073)
- Aboriginal Heritage Places (DPLH-001)
- Cadastre (LGATE-218)
- Contours (DPIRD-073)
- DBCA – Lands of Interest (DBCA-012)
- DBCA Legislated Lands and Waters (DBCA-011)
- Directory of Important Wetlands in Australia – Western Australia (DBCA-045)
- Environmentally Sensitive Areas (DWER-046)
- Flood Risk (DPIRD-007)
- Groundwater Salinity Statewide (DWER-026)
- Hydrography – Inland Waters – Waterlines
- Hydrological Zones of Western Australia (DPIRD-069)
- IBRA Vegetation Statistics
- Imagery
- Local Planning Scheme – Zones and Reserves (DPLH-071)
- Native Title (ILUA) (LGATE-067)
- Offsets Register – Offsets (DWER-078)
- Pre-European Vegetation Statistics
- Public Drinking Water Source Areas (DWER-033)
- Ramsar Sites (DBCA-010)
- Regional Parks (DBCA-026)
- Remnant Vegetation, All Areas
- RIWI Act, Groundwater Areas (DWER-034)
- RIWI Act, Surface Water Areas and Irrigation Districts (DWER-037)
- Soil Landscape Land Quality – Flood Risk (DPIRD-007)
- Soil Landscape Land Quality – Phosphorus Export Risk (DPIRD-010)
- Soil Landscape Land Quality – Subsurface Acidification Risk (DPIRD-011)
- Soil Landscape Land Quality – Water Erosion Risk (DPIRD-013)
- Soil Landscape Land Quality – Water Repellence Risk (DPIRD-014)
- Soil Landscape Land Quality – Waterlogging Risk (DPIRD-015)
- Soil Landscape Land Quality – Wind Erosion Risk (DPIRD-016)
- Soil Landscape Mapping – Best Available
- Soil Landscape Mapping – Systems

Restricted GIS Databases used:

- ICMS (Incident Complaints Management System) – Points and Polygons
- Threatened Flora (TPFL)
- Threatened Flora (WAHerb)
- Threatened Fauna
- Threatened Ecological Communities and Priority Ecological Communities
- Threatened Ecological Communities and Priority Ecological Communities (Buffers)

### F.2. References

Absolute Timber Solutions Pty Ltd (2022) *Clearing permit application CPS 9682/1*, received 4 April 2022 (DWER Ref: DWERDT586295).

Assessments for Authority's Approvals – Perlustro Buildings on behalf of Absolute Timber Solutions Pty Ltd (Perlustro Buildings) (2024) *Copy of Development Application to the City of Wanneroo*, received 15 January 2024 (DWER Ref: DWERDT919641).

Assessments for Authority's Approvals – Perlustro Buildings on behalf of Absolute Timber Solutions Pty Ltd (Perlustro Buildings) (2023) *Additional supporting information – Revised clearing area*, received 29 December 2023 (DWER Ref: DWERDT889874).

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- City of Wanneroo (2024a) *Additional advice for clearing permit application CPS 9682/1*, received 14 March 2024 (DWER Ref: DWERDT919698).
- City of Wanneroo (2024b) *Updated advice for clearing permit application CPS 9682/1*, received 12 August 2024 (DWER Ref: DWERDT989792).
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