



2 May 2022

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

Email: info@dwer.wa.gov.au

Dear Sir/Madam

RE: Bunbury Water Resource Recovery Scheme – Stage 2 Distribution Pipeline, Assessment of the Ten Clearing Principles under Schedule 5 of the Environmental Protection Act 1986

Background Information

Bunbury Water Corporation trading as Aqwest propose to construct a wastewater recovery facility, referred to as the Bunbury Water Resource Recovery Scheme (BWRRS) (the Proposal), including a Recycled Water Treatment Plant (RWTP) and distribution pipelines, to provide treated wastewater (TWW) for the irrigation of existing public open spaces within the City of Bunbury (Hay Park, Hands Oval and Forrest Park) and for construction water requirements of the Bunbury Outer Ring Road (BORR) project.

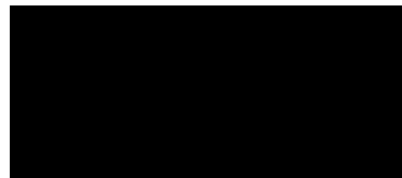
The Proposal, which has received funding as part of the State Government's WA Recovery Plan, will alleviate the use of high-quality potable water from the Yarragadee Aquifer, for these purposes. This innovative project will, in part, address the impact that climate change is having on water sources by protecting the sustainability of the Yarragadee Aquifer and its ongoing supply of potable water to homes in Bunbury.

The distribution pipeline for TWW will be constructed in two stages:

- Water Resource Recovery Scheme (WRRS) Stage 1 – Open Space Irrigation in City of Bunbury ('Stage 1')
 - Stage 1 pipeline route lies from the RWTP to Parade Road, and north to City of Bunbury public open spaces, a distance of approximately seven kilometres (km).
- WRRS Stage 2 – BORR construction water ('Stage 2')
 - Stage 2 pipeline route is located from Parade Road/Washington Avenue bifurcation to BORR point-of-use at South Western Highway. The Stage 2 route covers a distance of approximately 5.5 km and follows the boundary between the City of Bunbury and Shire of Capel along almost the entirety of its length.

This letter has been prepared in support of an application for a Native Vegetation Clearing Permit (NVCP) under Section 51E of Part V of the Environmental Protection Act 1986 (EP Act), for activities associated with construction of Stage 2 distribution pipeline from the Parade Road/Washington Avenue bifurcation to just prior to South Western Highway only, which forms part of the larger Proposal. See Figure 1 (Attachment 1) for extent of the NVCP application area. Construction of the Stage 2 pipeline will include vegetation clearing, removal/reinstatement of topsoil, excavation and open trenching for installation of pipelines.

Stage 1 has not been included in this NVCP application as there is no clearing of native vegetation proposed for installation of the Stage 1 pipeline. The Stage 1 pipeline route has been carefully designed by Aqwest to avoid areas of native vegetation where practicable. Where the alignment cannot avoid native vegetation, construction methods such as horizontal directional drilling (HDD) or similar, will be used in conjunction with standard practices to avoid damage to vegetation.



Avoidance of native vegetation clearing was a key consideration in the preparation and planning of the Stage 2 pipeline alignment. Alternative pipeline alignments were explored, with the pipe route and infrastructure footprint with the lowest potential to impact on environmental factors selected as the preferred, based on biological surveys and consultation with Department of Biodiversity Conservation and Attractions (DBCA) amongst other stakeholders (GHD, 2021b).

Native Vegetation Clearing Permit application area

The NVCP application area is approximately 5.5km in length, with a disturbance area of approximately 7.14ha. The disturbance area includes 6.62ha of open trench construction and 0.52ha of HDD (Figure 2, Attachment 1). Of this, 5.47ha is within Completely Degraded area / cleared areas and 1.44 ha of native vegetation in Very Good to Degraded condition (0.65 ha of Degraded, 0.65 ha of Good and 0.33 ha of Very Good vegetation). The NVCP application area includes the following locations:

- Parade Road/ Washington Avenue intersection to Bussell Highway via Centenary Road
 - This section is within the existing cleared road reserve and avoids clearing of vegetation by reducing the width of excavations/ disturbance and minor deviations around existing vegetation.
- Centenary Road reserve (unbuilt) to Bunbury Regional Prison
 - This section is in an unbuilt road reserve, the NVCP application area generally follows an existing old sand track (approximately 3-4 m in width with some regeneration) on the southern boundary of the road reserve. It deviates north at a Clay Pans of the Swan Coastal Plain Threatened Ecological Community (TEC) location to avoid impact the TEC, however there are unavoidable impacts to threatened communities and species.
- Centenary Road – Bunbury Regional Prison to South Western Highway
 - Along this section, the pipeline alignment is within a built road reserve and avoids clearing of vegetation.

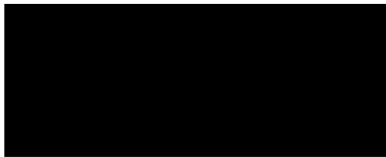
The following table includes Lot details and land tenure for the NVCP application area.

Table 1 Lots intercepted by the Proposed Action

Land parcel identifier	Reserve number	Owner	Land parcel type
Lot 937 on Plan 220462	16044	Department of Planning, Lands and Heritage	CROWN
Lot 9000 on Plan 61603	-	State of Western Australia	V CROWN LAND
Parade Road	-	City of Bunbury	P ROAD
Centenary Road (built and unbuilt)	-	City of Bunbury	P ROAD
Bussell Highway	-	Commissioner of Main Roads	P ROAD

Letters of consent from each of the landowners listed above, with the exception of the Commissioner of Main Roads as there is no proposed clearing within Bussell Highway road reserve, have been provided in Attachment 2. DPLH has provided a letter of consent for Lot 9000. The letter of consent for Lot 937 will be forwarded to DWER as soon as possible. Aqwest understands that approval to clear native vegetation cannot be issued until legal access to the land is provided.





Ten Clearing Principles Assessment

Schedule 5 of the EP Act defines Ten Clearing Principles for native vegetation. These principles aim to ensure that all potential impacts resulting from removal of native vegetation can be assessed in an integrated way. Clearing required for construction of the NVCP application area has been assessed against the Ten Clearing Principles, in accordance with the DWER’s A Guide to the Assessment of Applications to Clear Native Vegetation (DWER, 2014) to determine whether the application is at variance.

The assessment has been based on clearing of up to 1.44 ha of native vegetation within the 7.14 ha NVCP application area. The assessment indicates that clearing within the NVCP application area may be at variance with principles (b), (d) and (f) and is not considered likely to be at variance with the other principles (Attachment 3).

Clearing required for construction of the NVCP application area has also been referred to Department of Agriculture, Water and Energy (DAWE) under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act).

Draft Offset Strategy

Aqwest has developed a Draft Offset Strategy for the Proposed Action to counterbalance residual impacts on the Banksia Woodlands TEC and Tuart Woodlands TEC, and habitat for the conservation species black cockatoos and Western Ringtail Possums (Attachment 4 - Draft Offset Strategy).

Aqwest has applied Commonwealth and State offset policies, recovery plans and approved conservation advice in the development of this strategy. Two offset sites have been identified, an existing Aqwest managed reserve in Manea Park (Lot 935 on Plan 220463/ Lot 935 Somerville Drive, College Grove) and an Aqwest managed reserve in College Grove (Lot 933 on Plan 220464/ Lot 933 St John Mews, College Grove). Proposed offset areas for Stage 2 are shown in Figure 3, Attachment 1. The Department of Biodiversity, Conservation and Attractions (DBCAs) have confirmed that they are in support of vesting the Aqwest managed reserve in Manea Park for management as a conservation reserve.

Relevant investigation reports

The following relevant investigations have been undertaken for the purpose of the Proposal:

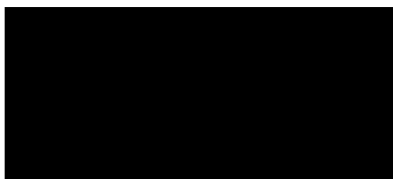
- Attachment 4 –DRAFT-12537061-00000-EN-RPT-008- Bunbury Water Resources Recovery Scheme Stage 2 Pipeline Draft Offset Strategy (GHD, 2021a)
- Attachment 5 – 12537061-00000-EN-RPT-006- Bunbury Water Resources Recovery Scheme Flora and Vegetation Survey (GHD, 2021c)
- Attachment 6 –12537061-00000-EN-RPT-005- Bunbury Water Resources Recovery Scheme Fauna Assessment (Biota Environmental Services, 2021)
- Attachment 7 –12537061-00000-EN-RPT-007- Phytophthora Dieback Occurrence Survey-Bunbury Water Resource Recovery Scheme (GSBL, 2020)
- Attachment 8 –DRAFT-12537061-00000-SU-RPT-001- Bunbury Water Resources Recovery Scheme – Pipeline Route Selection – Stages 1 and 2 (GHD, 2021b).

Please contact



if you have any queries or clarifications.

Yours faithfully



References

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