

Document Reference: EP20-151(07)--010

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23 February 2023

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Attention: Native Vegetation Clearing Referral  
Department of Water and Environmental Regulation  
8 Davidson Terrace, Joondalup WA 6027

*Delivered by email to: info@dwer.wa.gov.au*

Dear Sir/Madam

## **NATIVE VEGETATION CLEARING REFERRAL TO ENABLE EARTHWORKS FOR RESIDENTIAL DEVELOPMENT ON LOT 805 WATTLEUP ROAD, HAMMOND PARK**

QUBE Wattleup Development Company Pty Ltd (the proponent) engaged Emurge Associates (Emurge) to provide environmental consultancy services to support proposed residential development across several landholdings within the suburb of Hammond Park (City of Cockburn). One of the landholdings includes Lot 805 Wattleup Road (herein referred to as 'the site'). The residential development of the site in accordance with the Hammond Quarter Structure Plan, requires the proponent to undertake bulk earthworks across the site. The total development footprint over the site extends over approximately 3.18 ha and as part of the bulk earthworks the clearing of 0.03 ha of native vegetation is required across the site herein referred to as 'the clearing referral area' (refer to **Figure 1**).

The *Planning and Development Act 2005* provides for a schedule 6 exemption for the clearing of native vegetation in accordance with a subdivision approval. It is noted that subdivision approvals presently exist for the neighbouring Lot 803 and Lot 816, Wattleup Road (WAPC 148010); however, no subdivision approval currently exists across the site. Notwithstanding this, the proponent intends to progress the bulk earthworks required to enable future residential development within the site and Lots 803 and 816 concurrently. Therefore, as subdivision approval for the site are unlikely to be secured in time, any exemption would not apply to facilitate the required forward bulk earthworks resulting in the removal of native vegetation within the site. It is envisaged that once a subdivision approval is secured for the site, the schedule 6 exemption would apply to the clearing of the native vegetation within the site.

On this basis the proponent refers the proposed native vegetation clearing (0.03 ha) to the Department of Water and Environmental Regulation (DWER) pursuant to Section 51DA of the *Environmental Protection Act 1986* (EP Act) to determine whether a clearing permit is required. This letter provides information on existing environmental conditions and relevant environmental considerations within the site and provides an assessment of the proposed clearing against all clearing referral criteria listed in Section 51DA(4) of the EP Act. Based on an assessment undertaken by Emurge against these criteria it would appear that there are reasonable grounds to suggest that the clearing within the clearing referral area would result in very low environmental impacts.

## 1 INTRODUCTION AND BACKGROUND

The site encompassing the clearing referral area is located approximately 24 km south of the Perth Central Business District within the City of Cockburn, as shown in **Figure 1**. The site is bounded by Wattleup Road and new residential development to the north, urban zoned land parcels for future residential development immediately to the west and east and lots secured under Planning Control Area 156 (future extension of Rowley Road) immediately to the south.

Based on a review of publicly available historical aerial photography, by 1970 the entirety of the site had been cleared of native vegetation (Landgate 2023). From circa 1977 the site was used likely for poultry farming and successive episodes of vegetation regrowth is evident in particular in the southern portion of the site. From 1980 and onwards, it is evident that vegetation has been replanted where trees occur in geometrically regular alignment along fence lines and in close proximity to buildings. By 2010 all buildings within the site were removed and no further human use of the site has been evident. Planted and regrowth vegetation has remained within the site until this date. Historical aerial imagery of the site is shown in **Figure 2** attached. Presently the site comprises predominantly non-native vegetation and limited native vegetation regrowth comprising largely small shrubs, whilst a number of native trees appear to remain within the site that have either naturally regrown or have been planted.

The clearing of vegetation within the site will allow bulk earthworks to commence and ultimately enable the construction of residential houses and public open space areas. The activities required to be undertaken within the site include the following:

- The clearing of all existing vegetation within the site (native and non-native).
- Bulk earthworks, including cutting and filling of the land and the importation and/or exportation of clean construction fill where required.
- Civil construction works, including the construction of residential lots, roads, public open space areas, service infrastructure and all other associated construction works to establish a residential estate.

## 2 ENVIRONMENTAL CONTEXT

An ecologist from Emerge visited the site on 6 January 2023 and undertook a flora and vegetation survey in accordance with the Environmental Protection Authority's *Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment*, in addition to a fauna survey. The flora, vegetation and fauna assessment is provided as **Attachment 3**. It is noted that the flora, vegetation and fauna assessment undertaken by Emerge included the entirety of Lot 805, whilst only a portion of the lot ( the clearing referral area within the bounds of the site) is applicable to this clearing referral. No other environmental assessments are known to have previously been undertaken for the site.

The site has historically been cleared of native vegetation prior to 1970 with regrowth occurring since in the site, whilst the majority of vegetation within the site comprises non-native and evidently planted vegetation. The predominantly 'Non-native' vegetation areas within the site comprise 'a closed forest of predominantly non-native, planted *Eucalyptus* spp. over low closed non-native grassland and forbland' in 'Completely Degraded' condition. Native vegetation values within the site are restricted to occasional native plants (small trees, shrubs and forbs) scattered across the site. Additionally, a single mature *Eucalyptus gomphocephala* (tuart) tree occurs within the site which was recorded as native. The key environmental features within the site include the following:

- Native vegetation within the site is limited to a total of 11 species comprising individual trees (3) and shrubs such as *Eucalyptus gomphocephala* (tuart) *Banksia attenuata* and *Jacksonia stenbergiana* with the full list of species provided in **Attachment 3**.

- Native vegetation including the two *banksia* trees and the single *Eucalyptus gomphocephala* within the clearing referral area potentially provide black cockatoo foraging habitat (<0.1ha). No evidence of black cockatoo foraging was found within the site.
- The individual *Eucalyptus gomphocephala* within the site meets the definition of a 'potential black cockatoo nesting tree' as it was measured to have a diameter at breast height (DBH) of greater than 500 mm; however, it does not contain any hollows suitable for black cockatoo breeding.

### 3 APPROVALS CONTEXT

The site and adjacent lots comprise part of a larger group of the proponent's landholdings already under development including lots subject to the Hammond Grove and Hammond West Structure Plans north of the site. In November 2020, the Minister for Planning approved the subdivision of the sites neighbouring lots to the west (Lots 803 and 816) and the proponent is currently seeking subdivision approval for the site with the relevant authorities. Once the relevant subdivision approvals have been granted for the site, it is envisaged that an exemption for the clearing of native vegetation within the clearing referral area will apply. Notwithstanding this, the proponent intends to progress the bulk earthworks within the site and Lots 803 and 816 concurrently prior to gaining subdivision approval for the site and hence this clearing permit referral is being progressed.

Pursuant to the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) proposed actions likely to result in significant environmental impacts to matters of national environmental significance (MNES) require referral for assessment to the Department of Climate Change, Energy, the Environment and Water (DCCEEW), even in the instance where clearing of vegetation has been approved by DWER. A person must not take action that has, will have or is likely to have significant impact to any MNES without approval from the Australian Government Minister for the Environment. In relation to the site, an assessment of potential impacts from the urban development associated with the structure plan on significant environmental values and MNES was undertaken by Emerge. The assessment determined that existing vegetation values within the clearing referral area and the broader site are not material in terms of impacts to any MNES. The proposed action to undertake urban development within the site as part of the broader structure plan, has therefore been determined to not pose any significant impacts on MNES and does not require referral to DCCEEW pursuant to the EPBC Act.

Native vegetation, limited to two native *banksias*, multiple small native shrubs and forbs, occur in the south-west corner of the site on the lot boundary between the site and Lot 803 to the west. Although not qualifying to meet the criteria of a priority or threatened ecological community as an individual patch (<0.01ha), the native vegetation occurrence in this portion of the site might be considered to form part of the Banksia Woodlands of the Swan Coastal Plain TEC occurrence within Lot 803 as further discussed in the following sections. It is noted that Lot 803 (previously Lot 809) adjacent to the west of the site was referred (referral #EPBC 2021/8933) by the proponent to the Department of Agriculture, Water and the Environment (DAWE) (now DCCEEW) on 19 April 2021 pursuant to the EPBC Act. The proposed action was referred on the basis that all native vegetation comprising the Banksia Woodlands of the Swan Coastal Plain TEC and also providing potential suitable black cockatoo foraging habitat would be cleared to enable the residential development of Lot 809. On 13 September 2022 approval was granted by DCCEEW to clear all vegetation within Lot 803 allowing for residential development to proceed.

## 4 CLEARING REFERRAL

**Attachment 1** contains the signed application for 'New Permit of Referral to Clear Native Vegetation Form' for processing by DWER.

**Attachment 2** contains the Certificate of Title for the site (Lot 805 Wattleup Road, Hammond Park).

**Attachment 3** contains a copy of the assessment report for the flora, vegetation and fauna survey undertaken by Emerge.

## 5 CLEARING REFERRAL AREA

Pursuant to Division 2 Section 51A (a) of the EP Act, native vegetation does not include vegetation that was intentionally sown, planted or propagated and hence all evidently planted or non-native vegetation, potentially required to be cleared within the site, is not subject to this referral.

The clearing referral area only refers to vegetation determined to be native vegetation including trees and shrubs that have naturally regenerated within the site since the site was completely cleared of vegetation in 1970. For the purposes of this clearing referral, the clearing referral area excludes any non-native or evidently planted vegetation that occurs within the broader site. The clearing referral area may include small areas of non-native vegetation (non-native grasses and trees) where patches of native vegetation were mapped encompassing non-native vegetation or native shrubs occur at the bases of non-native trees, which could not be separated. Based on this, the clearing referral area is based on native vegetation canopy cover (0.03 ha) including small buffers where it is difficult to isolate individual shrubs and small trees, as shown in the attached **Figure 3**.

The native tree species within the site appear to have predominantly either been planted or have naturally regenerated following clearing. Where trees occur as scattered paddock trees and in small patches it is difficult to determine whether they have naturally regrown or were planted; therefore, as a conservative approach the single *Eucalyptus gomphocephala* (tuart) within the site, which was determined to have likely been planted, has been considered as remnant native vegetation and therefore forms part of the clearing referral area. Where trees occur in geometrically regular alignment including along fence lines, it was confidently determined that these have been planted and therefore have been excluded from the clearing referral area.

### 5.1 Flora and vegetation values

A flora and vegetation survey was undertaken by Emerge on 6 January 2023, which assessed the vegetation within the clearing referral area and the broader site. One (1) plant community, '**Non-native**', was identified within the site in 'Completely Degraded' condition, as shown in **Figure 4** and **Figure 5**. The '**Non-native**' plant community comprises 'a closed forest of predominantly non-native, planted *Eucalyptus* spp. over low closed non-native grassland and forbland'.

Occasional native plants (small trees, shrubs and forbs) are scattered across the site including a single *Eucalyptus gomphocephala* comprising a total area of 0.03 ha and the clearing referral area. This vegetation was not assigned to a plant community.

Photographic representation of plant community '**Non-native**' and the scattered native vegetation across the site is provided in **Plate 1** to **Plate 2** below respectively.



Plate 1: Plant community '**Non-native**' in 'Completely Degraded' condition



Plate 2: Example of scattered native shrubs and forbs

Due to the degraded vegetation condition within the site, a floristic analysis was not undertaken to classify the vegetation to a local floristic community type (FCT). No vegetation within the site and clearing referral area was identified as being representative of a threatened or priority ecological community. In addition, no threatened or priority flora species were identified within the site including the clearing referral area. The two *Banksia attenuata* trees and associated native shrubs and forbs within the south-western portion of the site (forming a portion of the clearing referral area) might be considered to form part of the adjacent patch of Banksia Woodlands of the Swan Coastal Plain threatened and priority ecological community occurrence in Lot 803 (previously Lot 809), which will ultimately be cleared in accordance with EPBC Act approval EPBC 2021/8933

(DCCEEW 2022). Notwithstanding this, the native plants within the clearing referral area in the south-west corner of the site were not identified as a threatened or priority ecological community as they comprise a relatively minor amount of vegetation.

Vegetation complex mapping for the Swan Coastal Plain undertaken by Heddle et al. (1980) indicates that the site occurs within an area mapped as the 'Bassendean Central and South' complex, which is described as 'vegetation ranging from woodland of *Eucalyptus marginata*, *Allocasuarina* – *Banksia* spp. to low woodland of *Melaleuca* spp. and sedgelands on the moister sites'. It was determined that due to the historical disturbance within the broader site and completely degraded nature of the vegetation, the vegetation within the clearing referral area and broader site is not representative of the 'Bassendean Central and South' complex.

## 5.2 Fauna values

A fauna assessment was undertaken by Emerge in January 2023. The site is located within the modelled distribution range of two threatened species of black cockatoo: *Zanda latirostris* (Carnaby's Black Cockatoo (CBC)) and *Calypthorhynchus banksii naso* (Forest Red-tailed Black Cockatoo (FRTBC)).

The clearing referral area contains one *Eucalyptus gomphocephala* (tuart) that has a DBH greater than 500 mm and therefore meets the definition of a black cockatoo 'potential nesting tree'. Notwithstanding this, no hollows were identified in this tree nor any other non-native trees within the broader site that may be suitable for black cockatoo breeding. As such the clearing referral area and the broader site does not currently provide suitable breeding habitat for any species of black cockatoo.

Native vegetation within the clearing referral area provides approximately 0.03 ha of suitable foraging habitat for black cockatoos, as shown in **Figure 6**. Native high value foraging habitat within the clearing referral area comprises predominantly *banksia* species (two trees) and *Eucalyptus gomphocephala* (tuart) (one tree). No evidence of foraging by black cockatoos was detected within the clearing referral area and broader site. The site has not been identified as a known roosting site for black cockatoos and no evidence of black cockatoo roosting was identified during the site survey.

## 5.3 Proposed clearing of native vegetation

Clearing of native vegetation within the clearing referral area is proposed to allow bulk earthworks to occur in preparation for the development of the site for residential purposes. The proposed clearing would consist of the removal of 0.03 ha of native vegetation comprising the clearing referral area, as shown in **Figure 3**. The remainder of vegetation within the broader site predominantly comprises non-native vegetation determined to be in 'Completely Degraded' condition, which will be cleared to enable works required for the development of the site and is not accounted for as part of the scope of this clearing referral.

## 6 RESPONSE TO THE CLEARING REFERRAL CRITERIA

Under Section 51C of the EP Act, clearing of native vegetation is an offence unless a clearing permit has been obtained, or unless:

- An exemption applies, or
- The proposed clearing was referred to DWER who determined that a permit is not required because the clearing is exempt, or the clearing satisfies all the referral criteria.

DWER's referrals process supports a risk-based approach to assessing native vegetation clearing proposals by establishing a pathway to assess very low impact clearing activities that are deemed not to require a permit. When assessing the clearing referral, DWER have regard to the referral criteria listed in Section 51DA(4) of the EP Act. A clearing permit is required if the referral does not meet all of the criteria.

In support of this clearing referral, the four referral criteria highlighted in the EP Act have been considered and responded to in **Table 1** below.

**Table 1: EP Act clearing referral criteria**

| EP Act Section 51DA(4) Criteria  | Response to the EP Act Clearing Referral Criteria  |
|--|--|
| <p><i>Criterion 1: The area proposed to be cleared is small relative to the total remaining vegetation</i></p> <ul style="list-style-type: none"> <li>• Relative to the total remaining vegetation in the region where the proposed clearing is located, and</li> <li>• Relative to the total remaining vegetation of the ecological community that the vegetation proposed to be cleared forms a part of</li> </ul> | <p>The site is located within the Metropolitan Perth Region Scheme constrained area. The 'constrained area' of Metropolitan Perth is the Swan Coastal Plain IBRA portion of the Perth Region Scheme. The Native Vegetation Clearing Referrals Guideline ('the Guideline') (DWER 2021) states that if the extent of the proposed clearing is more than 1 ha, a clearing permit is required. The proposed clearing would involve the removal of 0.03 ha of native vegetation, which is anticipated to result in a very low environmental impact.</p> <p>Vegetation complex mapping for the Swan Coastal Plain undertaken by Heddle et al. (1980) indicates that the site occurs within an area mapped as the 'Bassendean Central and South' complex, which is described as 'vegetation ranging from woodland of <i>Eucalyptus marginata</i>, <i>Allocasuarina</i> – <i>Banksia</i> spp. to low woodland of <i>Melaleuca</i> spp. and sedgelands on the moister sites'. The 'Bassendean Central and South' complex has approximately 26.9% of its pre-European extent remaining on the Swan Coastal Plain, which is above the 10% threshold for remaining extent of native vegetation in the Swan Coastal Plain region as highlighted in the Guideline.</p> <p>It was determined that due to the historical disturbance within the broader site and completely degraded nature of the vegetation, the vegetation within the clearing referral area and broader site is not representative of the 'Bassendean Central and South' complex.</p> <p>A review of the current native vegetation extent dataset (DPIRD-005), within a 5 km buffer of the site, indicates that the threshold for remaining native vegetation surrounding the boundary of the site is above the 10% as highlighted in the Guidelines. The pre-European native vegetation extent within 5 km of the site was approximately 8257 ha, whilst as of 2020 there was an estimated total of 3985 ha of native vegetation remaining (approximately 48%) within a 5 km radius of the site, as shown in <b>Figure 7</b>.</p> <p>Due to the degree of historical disturbance and the present condition of the site, native vegetation was not identified to be considered part of any threatened ecological and/or priority ecological community. The two <i>Banksia attenuata</i> trees and associated native shrubs and forbs within the south-western portion of the site (forming a portion of the clearing referral area) might be considered to form part of the adjacent patch of Banksia Woodlands of the Swan Coastal Plain TEC/PEC occurrence in Lot 803 (previously Lot 809), which will ultimately be cleared in accordance with EPBC Act approval EPBC 2021/8933</p> |

| EP Act Section 51DA(4) Criteria   | Response to the EP Act Clearing Referral Criteria   |
|---|---|
|   | <p>(DCCEE 2022). Notwithstanding this, the native plants within the clearing referral area in the south-west corner of the site were not identified as threatened ecological and/or priority ecological community as they comprise a very minor amount of vegetation (two trees and nine shrubs) separated by a 3 m wide fire break from vegetation to the west (Lot 803).</p> <p>Due to the completely degraded vegetation condition within the site, a floristic analysis was not undertaken to classify the vegetation to a local floristic community type (FCT).</p> <p>Overall, the proposed clearing is not considered to be at variance with this criterion and ultimately would result in very low environmental impacts as required by the Guidelines and the EP Act.</p>  |
| <p><i>Criterion 2: There are no known or likely significant environmental values within the area</i></p> <ul style="list-style-type: none"> <li>• Biological values (e.g. flora, fauna, ecological communities)</li> <li>• Conservation values (e.g. impact to ecological linkages, conservation areas and heritage values)</li> <li>• Land and water resource values (e.g. wetlands and watercourses, water resources, land and soil quality)</li> </ul> | <p>The existing vegetation within the site was determined to be dominated by non-native flora species. The predominantly 'Non-native' vegetation areas within the site comprise 'a closed forest of predominantly non-native, planted <i>Eucalyptus</i> spp. over low closed non-native grassland and forbland' in 'Completely Degraded' condition. Native vegetation values within the site (0.03 ha) are restricted to occasional native plants (small trees, shrubs and forbs) scattered across the site. Additionally, a single <i>Eucalyptus gomphocephala</i> (tuart) tree occurs within the site which was recorded as native and forms part of the clearing referral area. No threatened or priority flora species were identified within the clearing referral area, nor anywhere else within the site. Furthermore, no threatened or priority ecological communities were identified within the site including the clearing referral area, likely due to the degraded condition and severe historical disturbance. Overall, vegetation within the site and clearing referral area is of low biological diversity with native vegetation comprising 11 species (two trees and nine shrub species) and non-native vegetation comprising 13 identified species (species list provided in <b>Attachment 3</b>).</p> <p>Due to the historical disturbance of the site and the small extent of native vegetation remaining in the clearing referral area, the fauna habitat values within the site and clearing referral area are considered to be significantly reduced and likely only provide habitat for a range of common and widespread species (predominantly avian species).</p> <p>Native vegetation within the clearing referral area potentially provides foraging habitat for black cockatoo, albeit highly limited (0.03 ha). The single <i>Eucalyptus gomphocephala</i> (tuart) that has a DBH greater than 500 mm meets the definition of a black cockatoo 'potential nesting tree'; however, no hollows were identified in this tree nor any other non-native trees within the broader site that may be suitable for black cockatoo breeding. As such the clearing referral area and the broader site does not currently provide suitable breeding habitat for any species of black cockatoo.</p> <p>No known roosting sites are known to occur within the site and no evidence of black cockatoo roosting was identified during site-specific investigations.</p> <p>There are large amounts of likely much higher quality and more suitable black cockatoo foraging, roosting and breeding habitat within local and regional proximity to the clearing referral area. Harry Warring Marsupial Reserve is located approximately 0.5 km to the north of the site estimated to provide 173 ha of vegetation providing habitat for CBC and 145 ha for FRTBC. Additionally, Bush Forever Sites 393, 267 and 268 to the south-west and south of the site within a 2 km radius are expected to comprise an estimated 116 ha of habitat for CBC and FRTBC. These Bush Forever Sites are afforded some protection through land use zoning and it is therefore not anticipated that any black cockatoo habitat within these Bush Forever Sites will be cleared in the</p> |



| EP Act Section 51DA(4) Criteria   | Response to the EP Act Clearing Referral Criteria  |
|---|--|
|   | <p>future. The full extent of CBC and FRTBC habitat protected within Bush Forever Sites within a 2 km radius of the site is approximately 290 ha, whilst within 6 km of the site 3,455 ha of habitat for CBC and 3,415 ha for FRTBC are estimated to occur (refer to <b>Figure 8</b>). The loss of potential foraging habitat within the clearing referral area would equate to approximately 0.0008% of habitat for CBC and FRTBC within a 6 km radius of the clearing referral area.</p> <p>As per the Referral Guidelines for Three Threatened Black Cockatoo Species (DAWE 2022), high risks of significant impacts on black cockatoo are only likely to occur if clearing of more than 1 ha of quality foraging habitat would occur, the clearing would result in the loss of suitable or potential nesting trees and the removal of any part of a known night roosting site. It is highly unlikely that the removal of 0.03 ha of potential foraging habitat would result in a significant loss of an existing foraging source, nor represent a key local or regional resource for the species.</p> <p>Based on the above it was determined that the clearing referral area does not provide critical habitat for fauna species including significant fauna such as CBC and FRTBC. The clearing of native vegetation within the clearing referral area would not result in any significant impacts on fauna species.</p> <p>A review of the <i>Geomorphic Wetlands of the Swan Coastal Plain</i> dataset indicates that no conservation significant wetlands occur within or in close proximity to the site. No other wetland features occur within the site nor in the surrounding area.</p> <p>Acid sulfate soil (ASS) mapping prepared by DWER indicates that there are no occurrences of ASS within the site and the site's immediate surrounds. The DWER Contaminated Sites Database does not indicate any contamination within the site and the site's broader surrounds.</p> <p>The site is not associated with a Bush Forever site, environmentally sensitive area or a significant ecological linkage. Bush Forever Site 392 (Harry Warring Marsupial Reserve) is located approximately 0.5 km to the north of the site, whilst Bush Forever Sites 393, 268 and 267 occur within 2 km of the site. Any clearing of native vegetation within the clearing referral area would not impact on native vegetation within these areas due to the separation distance.</p> <p>The site is not situated within or in near proximity to a registered Aboriginal Heritage site. The nearest registered site (Place ID 4357 Wattleup Road Swamp) is located approximately 1.1 km to the north-west of the site.</p> <p>Overall, the proposed clearing is not considered to be at variance with this criterion and ultimately is anticipated to result in very low environmental impacts as required by the Guidelines and the EP Act. Although the clearing referral area comprises potential black cockatoo foraging habitat, this is highly limited (0.03 ha) and not critical habitat for black cockatoo and any other significant fauna species.</p> |
| <p><i>Criterion 3: The state of scientific knowledge of native vegetation within the region is adequate</i></p> | <p>The site is located within the Swan Coastal Plain. Various databases, spatial datasets and other relevant readily available information is available for the site and the broader region. Additionally, Emerge has undertaken a site-specific flora, vegetation and fauna investigation for the proposed development of the site. Detailed flora, vegetation and a fauna assessment was also undertaken for Lot 803 (previously 809) to the west of the site (Emerge Associates 2021) and multiple lots to the north.</p> <p>The proposed clearing would be undertaken in an area that is included and covered by various environmental databases, spatial datasets and other relevant readily available information and is therefore not</p>   |

| EP Act Section 51DA(4) Criteria   | Response to the EP Act Clearing Referral Criteria   |
|---|---|
|   | considered to be at variance with this criterion.   |
| <p><i>Criterion 4: Conditions will not be required to environmental impacts</i></p> | <p>As outlined above, the clearing referral area comprises highly limited native vegetation and the clearing of native vegetation would not result in critical habitat loss or significant impacts on threatened or priority fauna and flora species or any threatened or priority ecological communities. Additionally, it is anticipated that the impact on significant species such as black cockatoo will be minimal, and the development of the site and associated clearing of vegetation, including any identified non-native suitable black cockatoo foraging habitat (outside of the clearing referral area) will not trigger a referral under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> in relation to matters of national environmental significance.</p> <p>Due to the overall condition of native vegetation within the clearing referral area and the anticipated very low environmental impact resulting from the proposed clearing on flora and fauna species it is not anticipated that any conditions would be required to minimise, mitigate, offset or otherwise manage effects on the environment; therefore, the proposed clearing is not at variance with this criterion.</p> |

### Summary and closing

The proposed clearing referral area covers 0.03 ha of native vegetation in ‘Completely Degraded’ condition, whilst the broader site comprises non-native and cleared areas in ‘Completely Degraded’ condition.

It is Emerges’ opinion that the proposed clearing will only result in a very low environmental impact and is not at variance with the four referral criteria as outlined in the EP Act and the Guideline, which have been addressed in detail within this letter. In summary:

- The native vegetation within the clearing referral area was identified as highly limited in ‘Completely Degraded’ condition due to the severe historical disturbance of the broader site.
- Although there is potentially suitable foraging habitat for black cockatoo within the clearing referral area, albeit highly limited, this was identified as immaterial and/or not critical habitat for fauna species of environmental significance such as black cockatoo.
- There are no threatened or priority ecological communities, priority and/or threatened flora species likely to occur within the clearing referral area and broader site, whilst native vegetation in the clearing referral area provides some potential foraging habitat for black cockatoo species, albeit highly limited and not considered critical habitat for the species.
- The proposed clearing would result in the removal of 0.03 ha of native vegetation and is therefore relatively small compared to the remaining vegetation in the broader region (3985 ha) (5 km radius).
- The state of scientific knowledge of native vegetation within the region in which the proposed clearing is to take place (Swan Coastal Plain) is adequate.
- Emerge does not anticipate that any conditions would be required to manage environmental impacts in relation to the proposed clearing, as the proposed clearing is anticipated to only result in very low environmental impacts.

Should you have any questions regarding the content of this letter please do not hesitate to contact the undersigned.

Yours sincerely  
Emerge Associates



**Jason Hick**  
PRINCIPAL ENVIRONMENTAL CONSULTANT

cc:

Encl: Figure 1: Site Location and Clearing Area  
Figure 2: Historical Aerial Imagery  
Figure 3: Proposed Remnant Native Vegetation Clearing Extent  
Figure 4: Plant Communities  
Figure 5: Vegetation Condition  
Figure 6: Black Cockatoo Foraging Habitat  
Figure 7: Local Native Vegetation Extent  
Figure 8: Black Cockatoo Habitat Extent

### General References

Department of Agriculture Water and the Environment (DAWE) 2022, *Referral guideline for 3 WA threatened black cockatoo species Carnaby's Cockatoo (Zanda latirostris), Baudin's Cockatoo (Zanda baudinii) and the Forest Red-tailed Black-cockatoo (Calyptorhynchus banksii naso)*, Canberra

DWER 2021, *Guideline Native Vegetation Clearing Referrals*

Emerge Associates 2021, *Detailed Flora and Vegetation Assessment - Lot 809 Wattleup Road, Hammond Park, EP20-151(01)-002, Version 1.*

Hedde, E. M., Loneragan, O. W. and Havel, J. J. 1980, 'Vegetation Complexes of the Darling System Western Australia', in Department of Conservation and Environment (ed.), *Atlas of Natural Resources Darling System Western Australia*, Perth.

### Online References

Landgate 2023, *Landgate Map Viewer*, viewed 24 January 2023, < <https://map-viewer-plus.app.landgate.wa.gov.au/index.html> >

# Figures

*Figure 1: Site Location and Clearing Area*

*Figure 2: Historical Aerial Imagery*

*Figure 3: Proposed Remnant Native Vegetation Clearing Extent*

*Figure 4: Plant Communities*

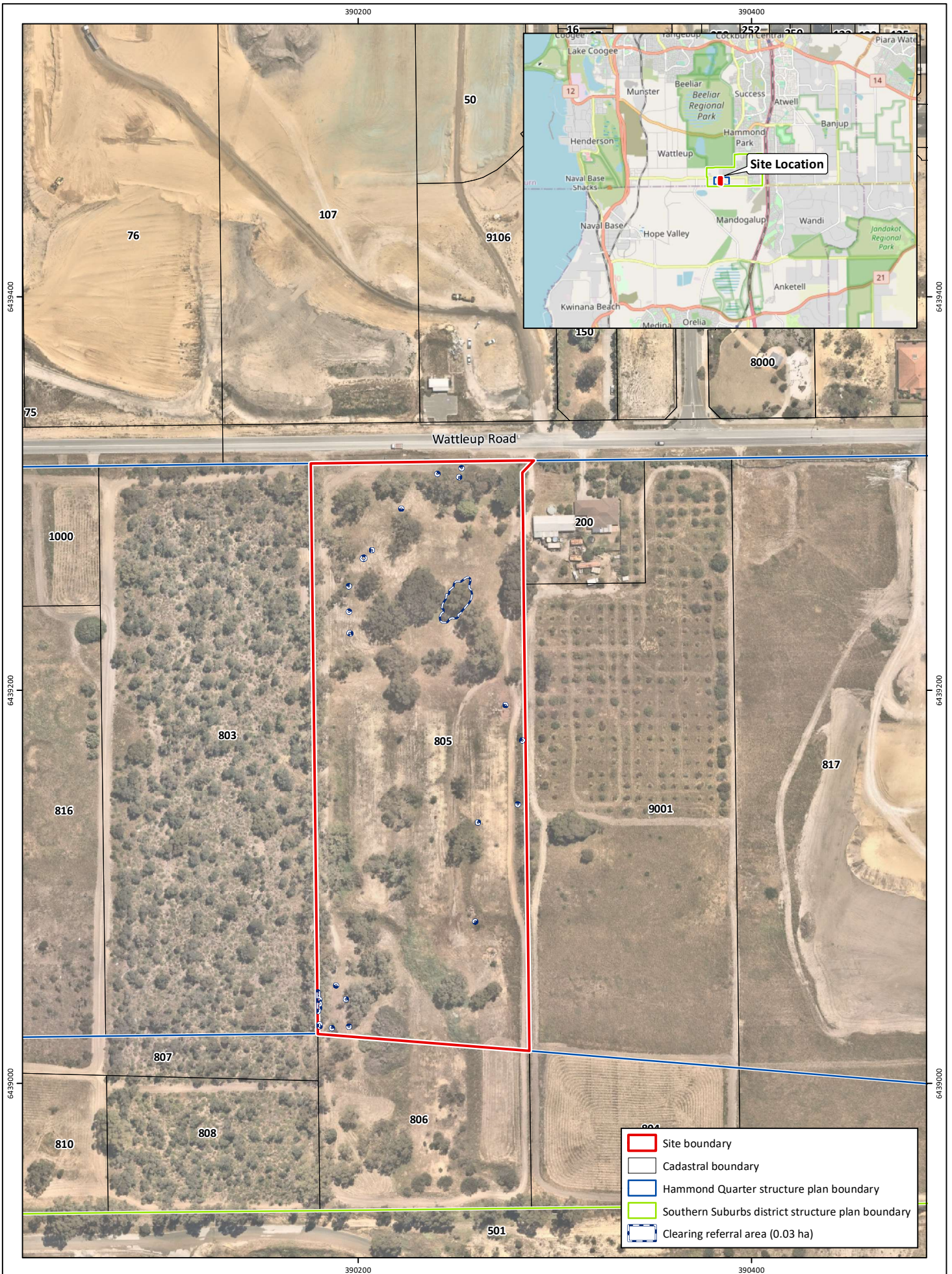
*Figure 5: Vegetation Condition*

*Figure 6: Black Cockatoo Foraging Habitat*

*Figure 7: Local Native Vegetation Extent*

*Figure 8: Black Cockatoo Habitat Extent*





**Figure 1: Site Location and Clearing Area**

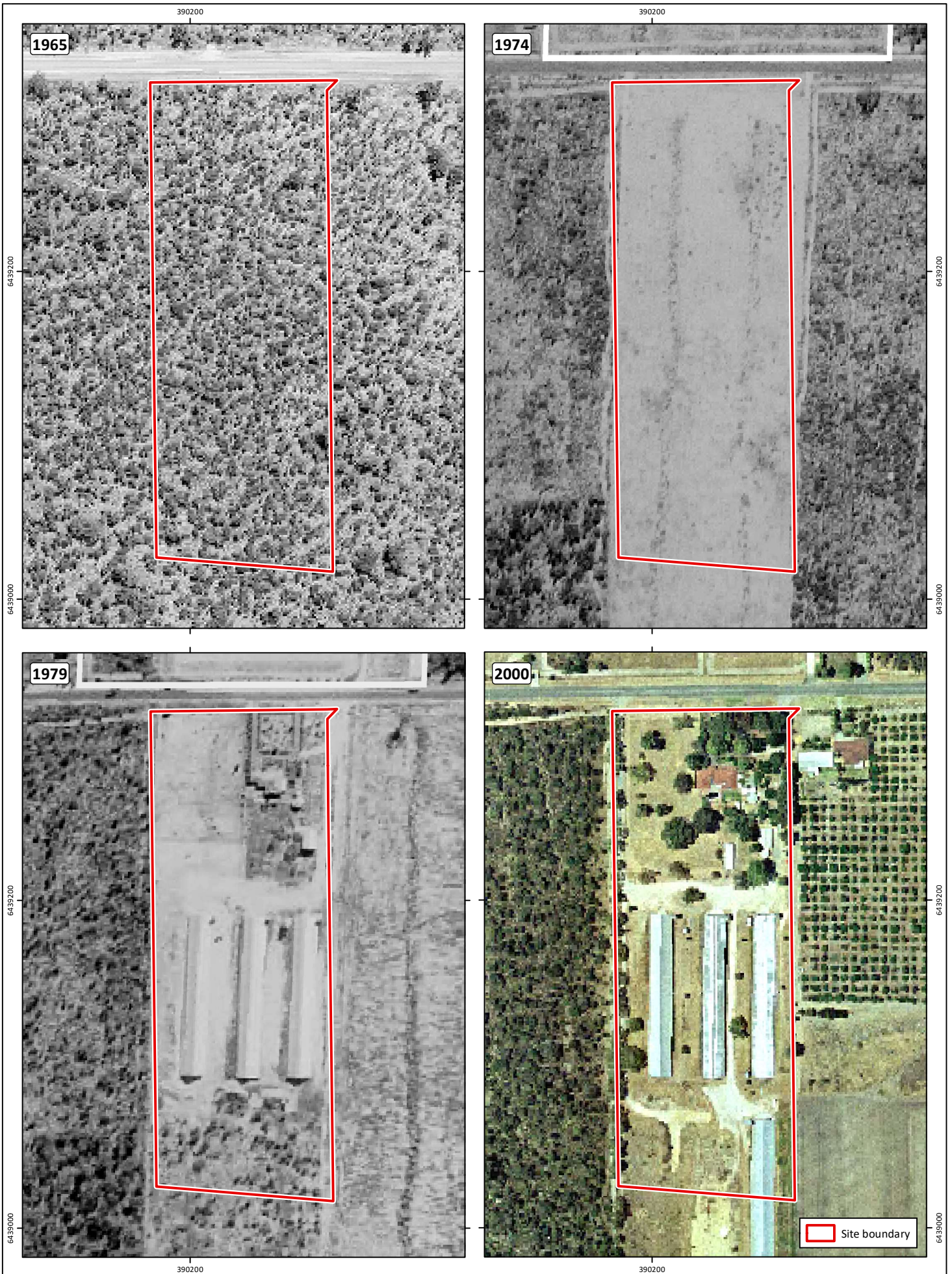
Plan Number:  
EP20-151(07)-F40  
Drawn: GAR  
Date: 01/02/2023  
Checked: PPS  
Approved: JDH  
Date: 23/02/2023



0 20 40 60  
Metres  
Scale: 1:2,500@A4  
GDA 1994 MGA Zone 50



**Project:** Clearing Referral  
Lot 805 Wattleup Road Development Application Support  
**Client:** QUBE Wattleup Development Pty Ltd



**Figure 2: Historic Aerial Imagery**

**Project:** Clearing Referral  
 Lot 805 Wattleup Road Development Application Support  
**Client:** QUBE Wattleup Development Pty Ltd

**Plan Number:** EP20-151(07)-F41  
**Drawn:** GAR  
**Date:** 01/02/2023  
**Checked:** PPS  
**Approved:** JDH  
**Date:** 23/02/2023



0 40 80  
 Metres  
 Scale: 1:3,000@A4  
 GDA 1994 MGA Zone 50

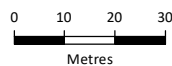




**Figure 3: Proposed Remnant Native Vegetation Clearing Extent**

**Project:** Clearing Referral  
 Lot 805 Wattleup Road Development Application Support  
**Client:** QUBE Wattleup Development Pty Ltd

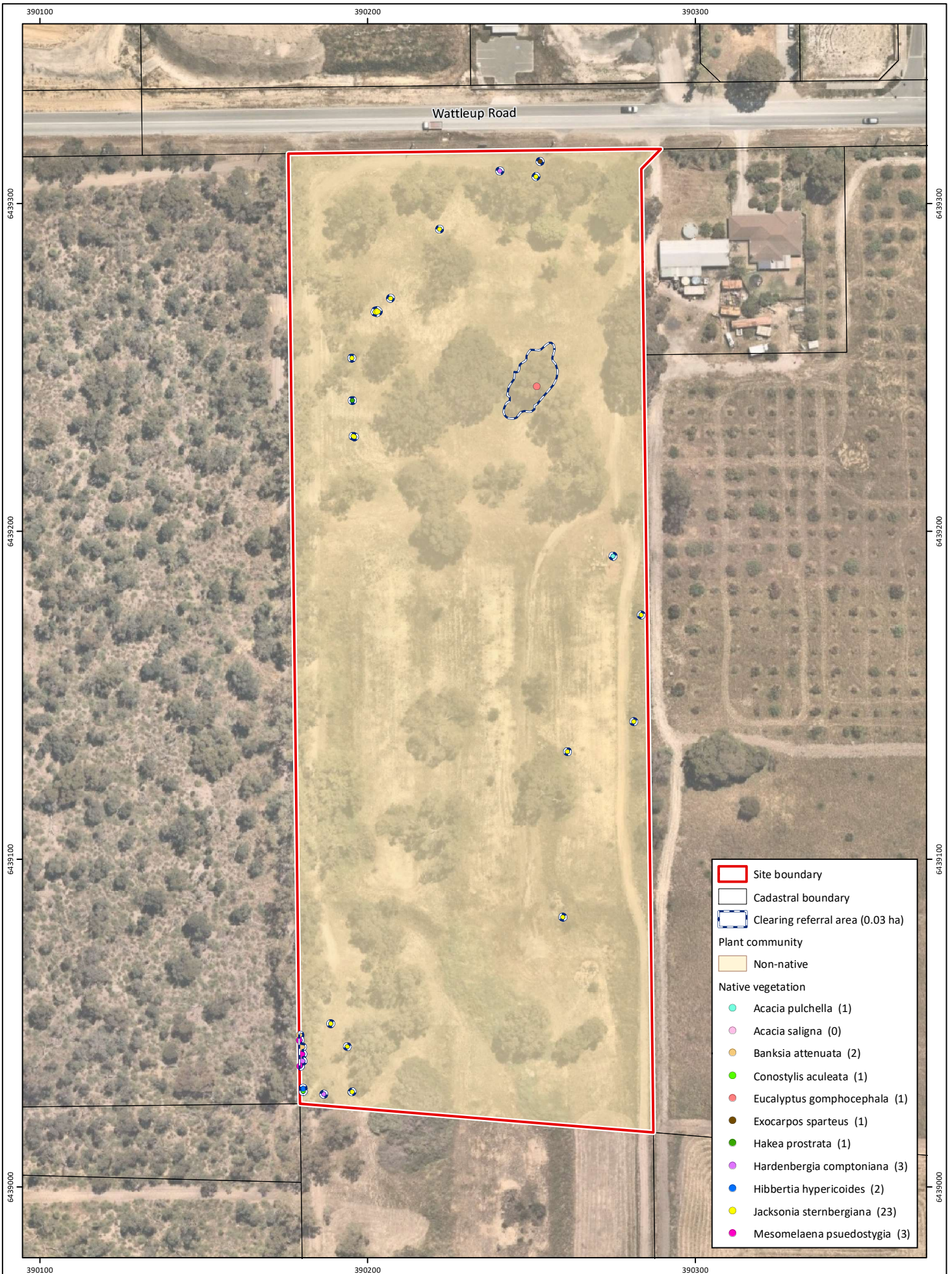
**Plan Number:** EP20-151(07)-F42  
**Drawn:** GAR  
**Date:** 01/02/2023  
**Checked:** PPS  
**Approved:** JDH  
**Date:** 23/02/2023



**Scale: 1:1,500@A4**  
 GDA 1994 MGA Zone 50

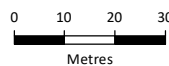






**Figure 4: Plant Community**

Plan Number:  
 EP20-151(07)-F43  
 Drawn: GAR  
 Date: 01/02/2023  
 Checked: PPS  
 Approved: JDH  
 Date: 23/02/2023

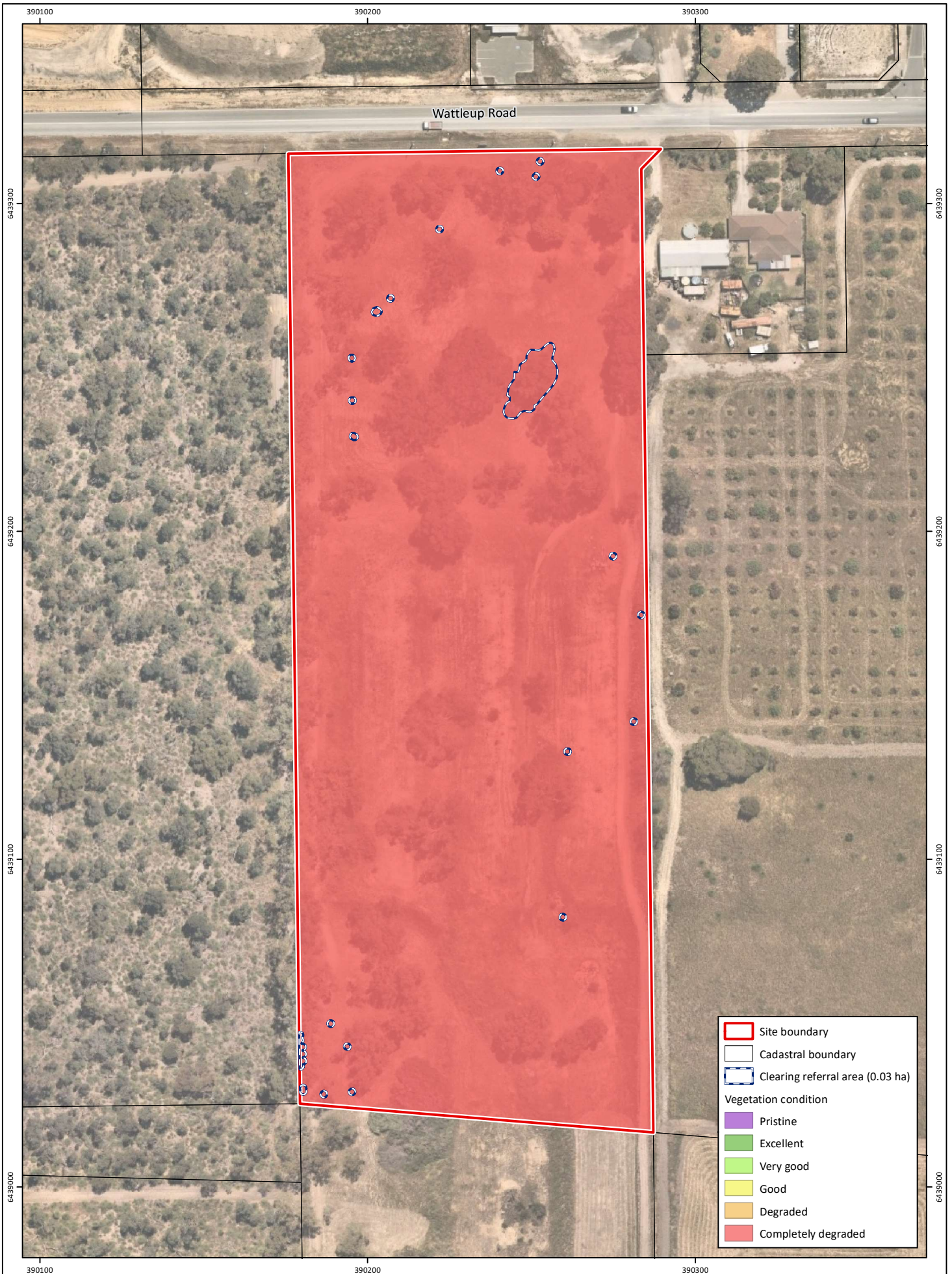


Scale: 1:1,500@A4  
 GDA 1994 MGA Zone 50

**Project:** Clearing Referral  
 Lot 805 Wattleup Road Development Application Support

**Client:** QUBE Wattleup Development Pty Ltd

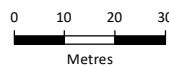




**Figure 5: Vegetation Condition**

**Project:** Clearing Referral  
 Lot 805 Wattleup Road Development Application Support  
**Client:** QUBE Wattleup Development Pty Ltd

**Plan Number:** EP20-151(07)-F44  
**Drawn:** GAR  
**Date:** 01/02/2023  
**Checked:** PPS  
**Approved:** JDH  
**Date:** 23/02/2023



**Scale:** 1:1,500@A4  
 GDA 1994 MGA Zone 50

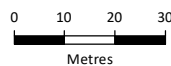




**Figure 6: Black Cockatoo Foraging Habitat**

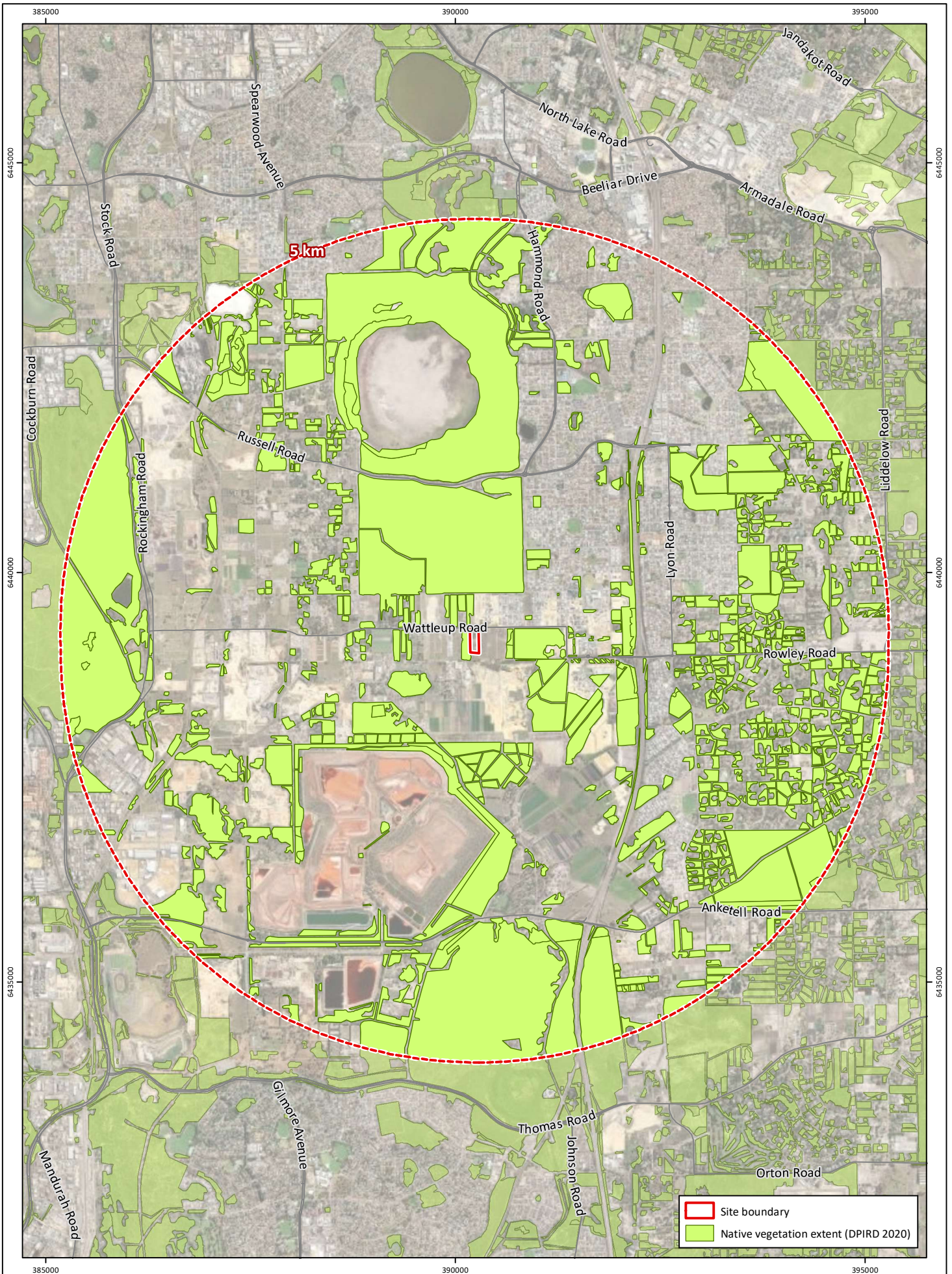
**Project:** Clearing Referral  
 Lot 805 Wattleup Road Development Application Support  
**Client:** QUBE Wattleup Development Pty Ltd

**Plan Number:** EP20-151(07)-F45  
**Drawn:** GAR  
**Date:** 01/02/2023  
**Checked:** PPS  
**Approved:** DH  
**Date:** 23/02/2023



**Scale:** 1:1,500@A4  
 GDA 1994 MGA Zone 50





**Figure 7: Local Native Vegetation Extent**

**Project:** Clearing Referral  
 Lot 805 Wattleup Road Development Application Support

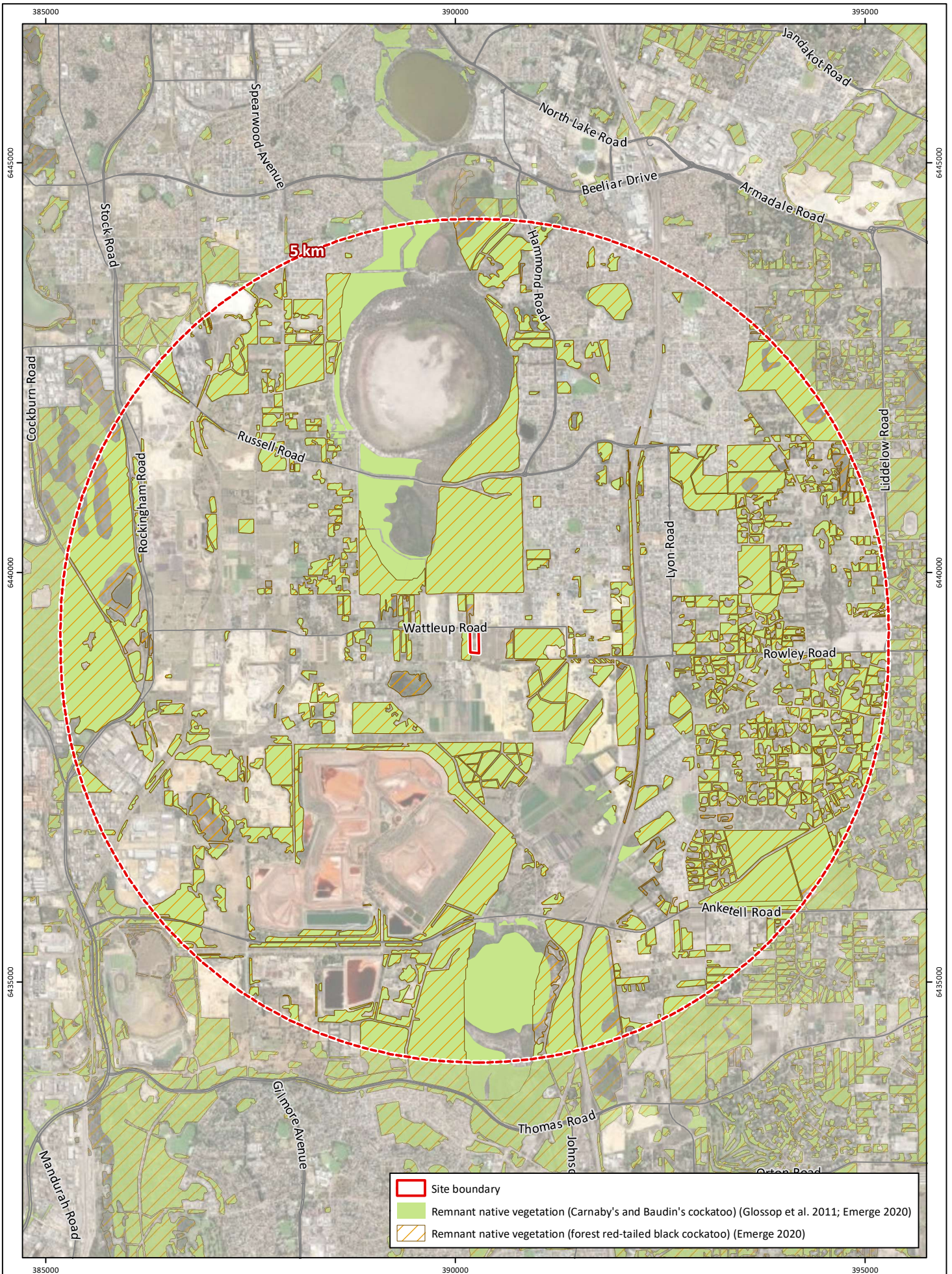
**Client:** QUBE Wattleup Development Pty Ltd

**Plan Number:** EP20-151(07)-F46  
**Drawn:** GAR  
**Date:** 01/02/2023  
**Checked:** PPS  
**Approved:** JDH  
**Date:** 23/02/2023

**0 380 760 1,140**  
 Metres  
**Scale: 1:60,000@A4**  
 GDA 1994 MGA Zone 50



While Emerge Associates makes every attempt to ensure the accuracy and completeness of data, Emerge accepts no responsibility for externally sourced data used.  
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**Figure 8: Black Cockatoo Habitat Extent**

**Project:** Clearing Referral  
 Lot 805 Wattleup Road Development Application Support  
**Client:** QUBE Wattleup Development Pty Ltd

**Plan Number:** EP20-151(07)-F47  
**Drawn:** GAR  
**Date:** 01/02/2023  
**Checked:** PPS  
**Approved:** JDH  
**Date:** 23/02/2023



0 380 760 1,140  
 Metres

Scale: 1:60,000@A4  
 GDA 1994 MGA Zone 50

