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Dear Tim,

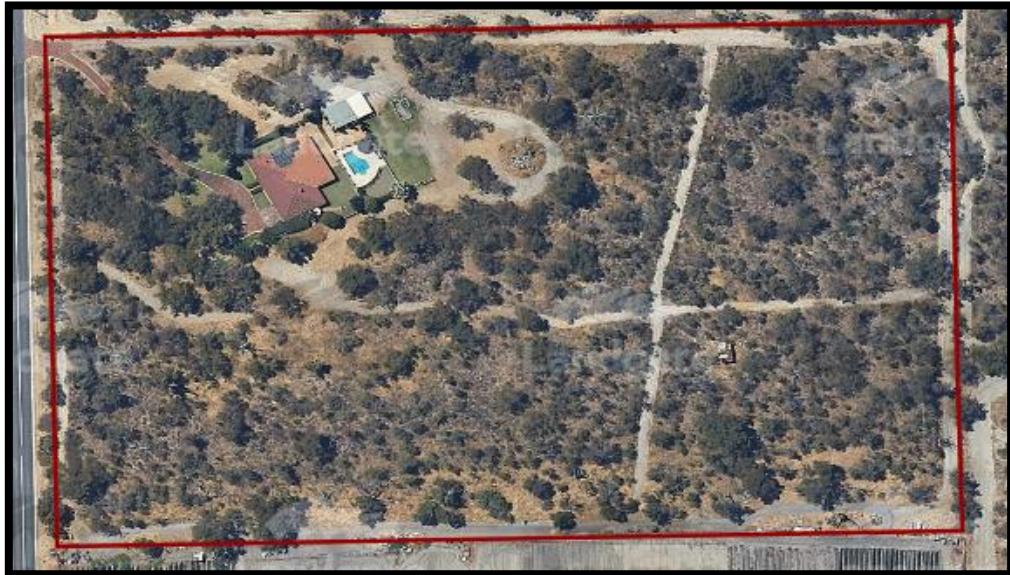
**RE: 462 Badgerup Road, Gnangara – Environmental Advice**

Following is our advice on the environmental features of 462 (Lot 5) Badgerup Road, Gnangara with regards to future development.

**1 Site Description**

462 Badgerup Road (the site) is 4.5755ha in size and is located in Precinct 12 of the East Wanneroo District Structure Plan (DSP). The site contains a house, shed and pool and native vegetation (Plate 1). Apart from area around the house, the native vegetation has not been cleared since at least 1965, the oldest available aerial photograph on-line. The two internal firebreaks were created in 2010.

**Plate 1: Aerial Photograph 2024 (Landgate Map Viewer Plus)**



## 2 Vegetation Type and Condition

I undertook a site inspection on 25 June 2024 to assess the vegetation type and condition and the likelihood of conservation significant flora and fauna occurring on site.

The vegetation type over most of the site is a Jarrah/Sheoak/Banksia Low Open Woodland over a Low Open Heath with common native species *Hibbertia hypericoides*, *Allocasuarina humilis* and *Desmocladus flexuosus* (Plate 2).

**Plate 2: Typical Jarrah/Sheoak/Banksia Low Open Woodland on the site**



The vegetation in the north-west corner is a Jarrah/Sheoak Woodland with very few to no Banksia trees.

The condition of the vegetation was mostly rated as Very Good – Good with an area south of the house containing more weeds and was rated as Good – Degraded.

## 3 Conservation Significant Flora and Vegetation

### 3.1 Flora

The site has some potential for Threatened flora to occur, such as the Grand Spider Orchid (*Caladenia huegeli*) however the potential is considered very low. The orchid species can only be identified during early spring when it is in flower.

Several plants of the Priority 4 plant species *Jacksonia sericea* were observed during the site inspection. Priority 4 species are not considered a constraint to development at State or Commonwealth level.

### 3.2 Vegetation

The site contains around 3.15ha of native vegetation. Approximately 2.8ha of the vegetation includes *Banksia attenuata* and *B. menziesii* trees as a distinctive tree canopy with Jarrah (*Eucalyptus marginata*) and Sheoak (*Allocasuarina fraseriana*) emerging. The area of Jarrah/Sheoak/Banksia Low

Open Woodland in Very Good – Good condition is estimated to be around 2.5ha, the remaining 0.3ha is in Degraded – Good condition.

The Jarrah/Sheoak/Banksia Woodland vegetation in Very Good – Good condition meets the definition of the Banksia Woodlands of the Swan Coastal Plain ecological community which is listed as a Priority Ecological Community at State level and a Threatened Ecological Community (TEC) under the Commonwealth EPBC Act.

#### **4 Fauna**

All tree species on the site have foraging value for Carnaby's Black Cockatoos. Evidence of Black Cockatoo foraging on Jarrah nuts was observed on the site (Plate 3). Approximately 3.15ha of foraging habitat occurs on the site.

**Plate 3: Black Cockatoo foraging evidence on Jarrah nuts**



Approximately 10 Jarrah trees were observed on site that had a diameter at breast height of 50cm or greater (Plate 5). Jarrah trees of this dimension are considered potential breeding habitat trees for Black Cockatoos as they either have a hollow suitable for breeding or could form a hollow in the next 50 years.

**Plate 4: Large Jarrah Tree on site**



## 5 Environmental Approvals

### 5.1 State Level

The site is zoned as Town Centre in the East Wanneroo DSP. The Environmental Assessment Study undertaken for the DSP mapped the vegetation on the whole site as the Banksia Woodland TEC. The Study identified the lot as a Priority Local Natural Area subject to further investigation. The final approved DSP did not retain the site as a Local Natural Area required to be protected.

The site is zoned Urban Deferred in the Metropolitan Region Scheme and Rural in the City of Wanneroo Local Planning Scheme No. 2. The Amendment to rezone the site in the Local Planning Scheme will be required to be referred to the EPA under Section 48A of the *Environmental Protection Act 1986* (EP Act). Given the amount of work that the DSP has been subject to over many years we think it is unlikely the EPA would want to assess an Amendment for the site.

Clearing native vegetation requires a clearing permit unless an exemption applies. A subdivision approval to develop the site would provide a Schedule 6 exemption if there was a condition of subdivision that required the clearing of vegetation to fulfil the condition. The standard engineering condition that requires cut and fill would be such a condition.

### 5.2 Commonwealth Level

Any clearing of vegetation that has the potential to have a significant impact on a Matter of National Environmental Significance (MNES) listed under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) must be referred to the Commonwealth Minister for a determination whether an assessment is required.

The MNES relevant to development of the site includes the Banksia Woodlands of the Swan Coastal Plain TEC and impacts on two species of Black Cockatoos, ie Carnaby's and Forest Red-tailed Black Cockatoos.

According to the EPBC Act Significant Impact Guidelines 1.1 any reduction in the area of a listed TEC is likely to have a significant impact and a referral is therefore required. The Guidelines do not state what level of impact would constitute a significant impact. However, given the site is zoned for a Town Centre, and the site is located on elevated land, the retention of any vegetation is considered highly unlikely. Therefore, the full 2.5ha of Banksia Woodland TEC would be cleared which is likely to be considered significant and a referral would be required.

According to the Black Cockatoo Referral Guidelines a significant impact could be any of the following:

- Clearing of more than 1ha of quality foraging habitat;
- Clearing of one or more actual or potential breeding habitat trees; and
- Clearing or disturbance to a known roost site.

The amount of foraging habitat on the site is estimated to be around 3.15ha. The number of potential breeding habitat trees is around 10. All foraging and breeding habitat is highly likely to be cleared for the Town Centre development. The clearing would be considered to have a significant impact and a referral would be required.

PGV Environmental considers the referral to clear the vegetation on the site would be fully assessed by the Commonwealth environment agency.

If a full assessment were required, an approval is highly likely to be granted. However, an approval would require an offset for the impact on Banksia Woodland TEC and Black Cockatoo habitat. The offset package could include the purchase of land that contains Banksia Woodland and Black Cockatoo Habitat or the rehabilitation of degraded land to improve cockatoo habitat, or a mixture of both. The ratio of land bought and/or rehabilitated compared to the amount cleared is worked out using the EPBC Act offset calculator. The purchase of land with good quality vegetation would be at a ratio of around 6:1. The ratio of rehabilitation works to vegetation cleared is usually lower, however the cost of rehabilitation per hectare is far higher than the cost of purchasing good quality vegetation and needs to be factored into the overall offset cost.

## **6 Further Environmental Work**

An EPBC Act referral would likely require an updated flora and vegetation survey and Black Cockatoo Habitat Assessment, unless there are existing detailed surveys for the site that are 5 years old or less.

The cost of a flora and vegetation survey and Black Cockatoo Habitat Assessment would be around \$10,000 (plus 10% GST).

The cost of an EPBC Act referral would be around \$7,000 for consultant fees plus an additional EPBC Act cost-recovery fee of \$6,500. Consultant cost for a full assessment would be around \$20,000 plus advertising costs (twice) and cost recovery fees. The cost recovery fees are determined by the Commonwealth environment agency based on the degree of complexity of the MNES being assessed.

A full assessment would take around one year with the main limiting factor for the assessment being the identification of a suitable offset for the Banksia Woodland TEC and Black Cockatoo Habitat.

The cost of an offset package is very hard to determine. As outlined above an offset package could include the purchase of land, rehabilitation of degraded land or a mixture of both at a ratio to be determined through the assessment process. If rehabilitation of degraded land is part of the offset, the Commonwealth environment agency will require that rehabilitation to be monitored by the Proponent for many years, at least 10.

## **7 Summary**

In summary, the vegetation on the site is a constraint to further development because of the application of the Commonwealth EPBC Act. We consider approval to clear the vegetation is likely to be granted, however the time and cost to obtain the approvals, as well as the ongoing cost of approval compliance and possible rehabilitation monitoring would be significant.

Please contact me if you would like to discuss any aspects of this advice.

Yours sincerely



Paul van der Moezel  
Managing Director