Vegetation Clearing Desktop Report

Busselton Substation Access Road

March 2025

Western Power

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Document Control

Document version history

Version	Date	Amendment
1	14/03/2025	Initial version
2	24/03/2025	Updated version
3	25/03/2025	Final version

1. Project Information

Project Area		
Project name: Busselton Substation Access Road **VC-2425-140, T0499816**		**Contract/Work Order No: TT048625**
Main purpose of clearing	**Permanent**	**Clearing area (ha) 0.12**
Access routes for existing and new assets	Permanent ☒	**0.12**
	Temporary ☐	
Proposed start date: 27/03/2025		**Expected completion date: 28/03/2025**
Method of clearing: Mechanical		**Machinery to be used:** **Pozzi Machine and Mulcher**
Project details: **The Busselton Substation is located at 531 (Lot 1) Rendezvous Road in Busselton.** **The works to clear vegetation to ground level are to enable the creation of a permanent line access track into the substation from South Substation Gate for vehicular access to Assets and Pads for civil install.** **This Vegetation Clearing Impact Assessment will assess the clearing requirements required for the works associated with creation of an access track to the Busselton substation.**		
Guardian Permit ID reference number: **PER-0001519.**		**Permit/Exemption number:** **CPS 1918/11**

2. Map/photos

Figure 1: Project Locality

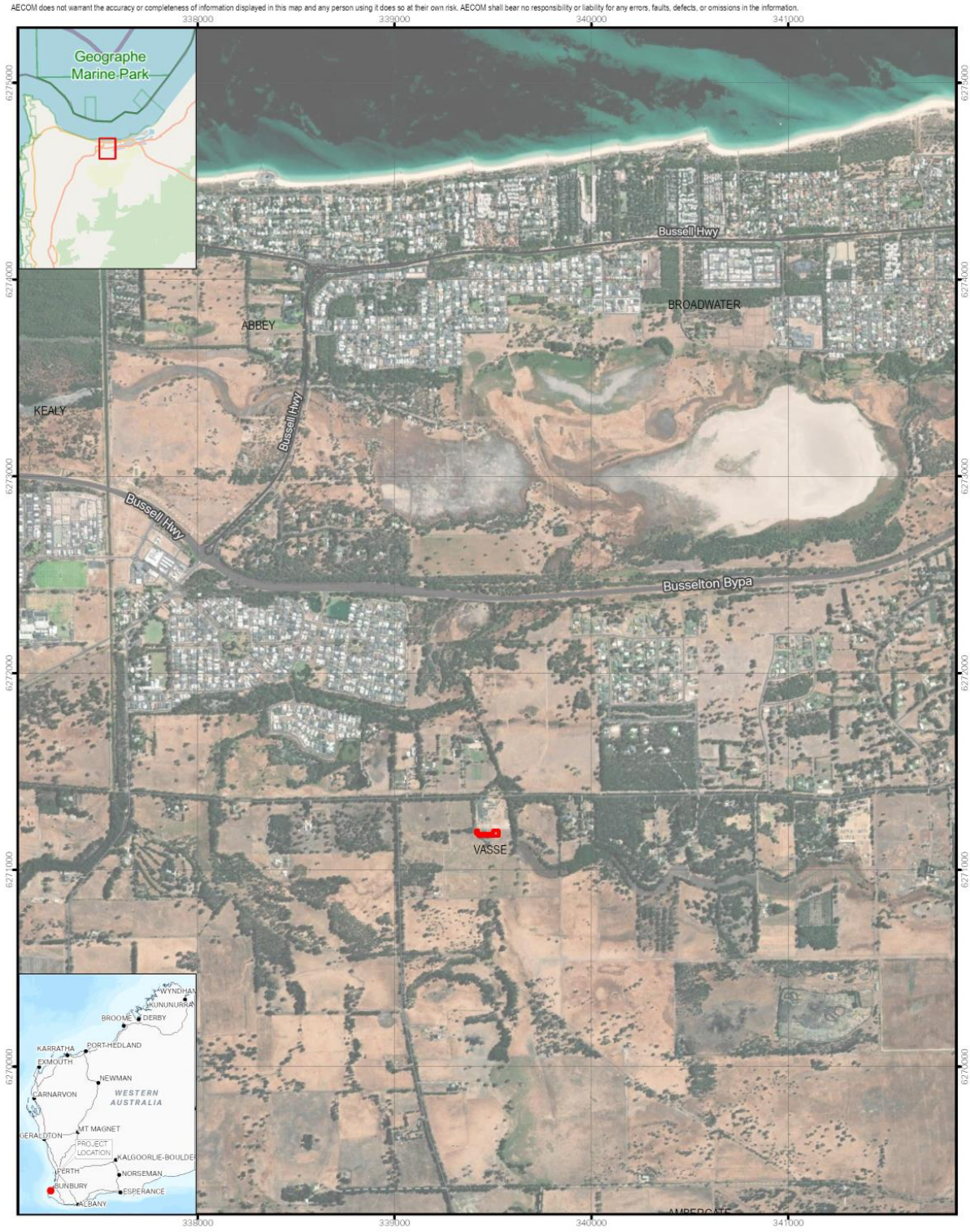
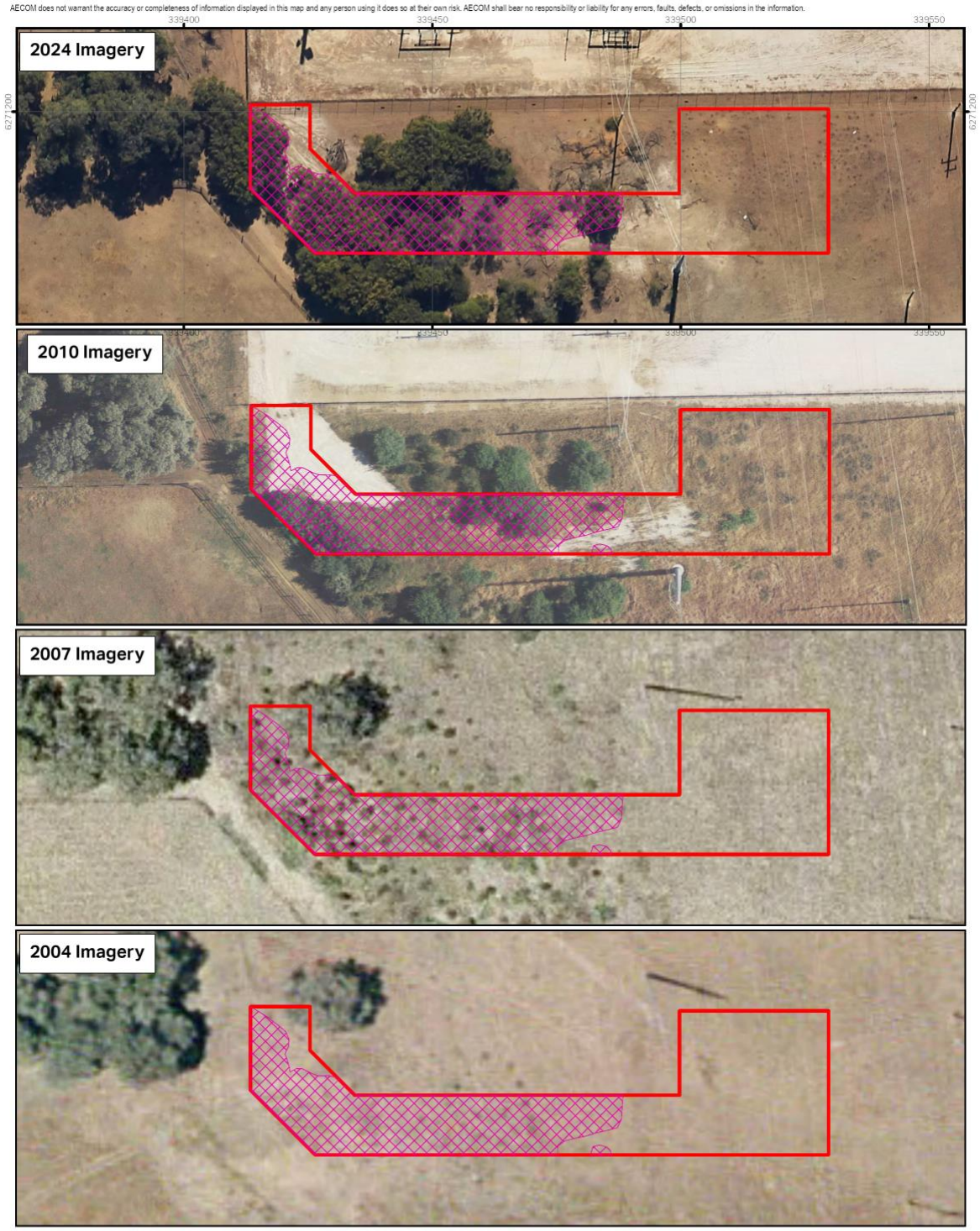


Figure 2: Historical Aerial Imagery



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PROJECT ID	60753351
CREATED BY	ROB.MCGREGOR
DATE MODIFIED	13 MAR 2025
APPROVED BY	L. ROGERS

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LEGEND
Development Envelope
Clearing Areas

Historical Aerial Imagery

WESTERN POWER

BUSSELTON SUBSTATION CLEARING PERMIT

Figure **2**

A4 size

Project: \\na.aecomnet.com\LPS\APAC\Perth-AUPER1\Legacy\Projects\607x\60753351_WP_Busselton_SubstationCPI900_CAD_GIS\820_GIS\02_MXD_APRX\01_2024_CP_Figures\01_2024_CP_Figures.aprx (rob.mcgregor)
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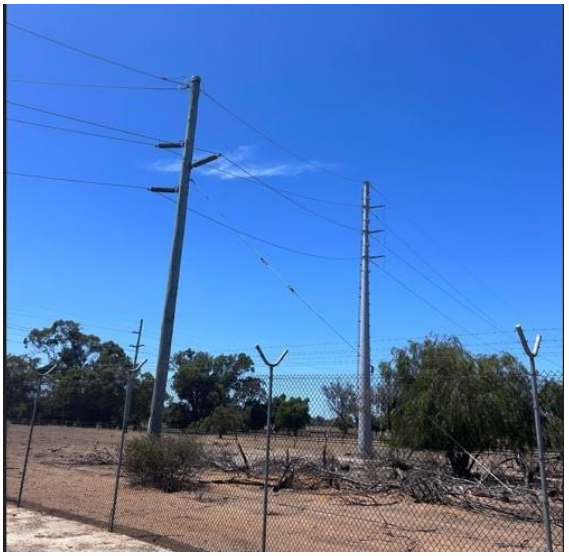
Site Photos:

Site Photos	
	
Photo 1: Clearing area outside fence showing overstorey of *Agonis flexuosa* species (Degraded condition).	Photos 2: Clearing area outside fence showing overstorey of *Agonis flexuosa* species (Degraded condition).
	
Photo 3: Image showing *Agonis flexuosa* trees in clearing area, noting lack of understorey.	Photo 4: Photo showing eastern edge of clearing area.
	
Photo 5: Photo looking back towards clearing area showing overstorey of *Agonis flexuosa* over no understorey.	Photo 6: Photo looking towards construction pad in already cleared area beyond the transmission poles.

3. Avoid, minimise and reduce extent and impact of clearing

Alternatives to clearing considered during the development of this project are outlined in Table 1:

Alternative to Clearing	Applicable	Discussion
Directional drilling of underground cables instead of open trenching	*Yes/No*	N/A
existing tracks are utilised where possible	*Yes*	The clearing will utilise a previous track that was cleared of any vegetation from as late as 2010 to minimise impacts on more established vegetation.
utilising previously cleared areas where possible	*Yes*	As above, previously cleared areas (cleared 15 years ago) will be utilised for the alignment of the access track to minimise impacts on more established vegetation.
consideration of alternative engineering and design options	*No*	Design options have considered access road alignment to follow previously cleared areas and minimise clearing requirements. Given the location of the access point into the substation no other alternatives are available to further reduce clearing requirements.
Other	*Yes/No*	*N/A*

Table 1: Alternatives to clearing

Proposed management

Western Power hygiene measures will be applied to ensure any vehicles or machinery are cleaned prior to entering the site.

The access road alignment will be clearly demarcated on-site with stakes and flagging tape where necessary. All contractors working at the site will be informed prior to works commencing that all works must be contained within the flagged works area to prevent any impacts to adjacent vegetation.

4. Site context

4.1 Land Tenure (Cadastral Information)

The property is located in the City of Busselton at 531 (Lot 1) Rendezvous Road, Vasse on Western Power owned land. The site is currently utilised as a Western power electrical substation.

4.2 Vegetation description

Based on site photos, the clearing area contains no native understorey and an overstorey consisting of a monoculture of *Agonis flexousa* less than 15 years old (based on aerial photography, refer to Figure 2 above). As a result, the site is considered to be in 'degraded' condition based on the Keighery vegetation condition scale.

The regional vegetation complex is mapped as being across two vegetation complexes, as listed below:

- **Abba Complex** - This includes a mixture of open forest of *Corymbia calophylla* (Marri) - *Eucalyptus marginata* (Jarrah) - Banksia species and woodland of *Corymbia calophylla* (Marri) with minor occurrences of *Corymbia haematoxylon* (Mountain Marri). Woodland of *Eucalyptus rudis* (Flooded Gum) - Melaleuca species along creeks and on flood plains are also part of this complex. The 2018 South West Vegetation Complex Statistics Report provided by the Department of Biodiversity Conservation and Attractions (DBCA) suggests there is 6.54% of this vegetation complex remaining compared to pre-European extent.

- **Karrakatta Complex-Central and South** – Predominantly open forest of *Eucalyptus gomphocephala* (Tuart) - *Eucalyptus marginata* (Jarrah) - *Corymbia calophylla* (Marri) and woodland of *Eucalyptus marginata* (Jarrah) - Banksia species. *Agonis flexuosa* (Peppermint) is co-dominant south of the Capel River. The 2018 South West Vegetation Complex Statistics Report provided by DBCA suggests there is 23.49% of this vegetation complex remaining compared to pre-European extent.

In addition, there is one pre-European vegetation association mapped across the survey area:

- **Vegetation association number 1136** - Medium woodland; marri with some jarrah, wandoo, river gum and casuarina. The 2018 Statewide Vegetation Association Statistics Report suggests 6.94% of this vegetation association remaining compared to pre-European extent.

Review of historical aerial photography shows the site, and surrounding area was devoid of any vegetation as recent as 2003. The area of the proposed access track was still mostly devoid of any vegetation as recent as 2010 (refer to Figure 2), with *Agonis flexuosa* having grown back over the proposed clearing area since that time.

4.2.1 Fauna

The site consists of juvenile *Agonis flexuosa* trees over no understorey in 'degraded' condition, providing minimal species diversity and lack of available habitat for fauna.

Based on desktop mapping there are 4 conservation significant fauna species that may utilise the site for habitat, these being:

- Western Ringtail Possum (*Pseudocheirus occidentalis*) Critically Endangered under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and *Biodiversity Conservation Act 2016* (BC Act).

- Carnaby's Black Cockatoo (*Zanda latirostris*) Endangered under the EPBC Act and BC Act.

- Baudin's Black Cockatoo (*Zanda baudinii*) Endangered under the EPBC Act and BC Act.

- Forest Red-tailed Black Cockatoo (*Calyptorhynchus banksii naso*) Vulnerable under EPBC Act and the BC Act.

5. Spatial assessment (SPIDA View)

Western Power's online risk GIS database was analysed, and the following layers are indicated as having the potential for clearing impacts within a local area search of *187m by 40m*.

DBCA managed tenure	☐	Bush Forever	☐	CAWS Act Area	☐	Native Vegetation Clearing Regs ESAs	☐
Conservation listed fauna	☐	Conservation listed flora	☐	Western Power ESA sites	☐	Native vegetation remaining	☐
Threatened ecological communities	☒	Acid Sulfate Soils	☒	PDWSA	☐	Ramsar or Important Wetlands	☐
Geomorphic or other mapped wetlands	☐	Disease Risk Areas	☐	Erosion risk	☐	Offset areas	☐
Watercourses	☐	Land Degradation	☐		☐		
Other ☒ Details: Declared Rare Flora and Wetlands and Drainage							

6. Assessment of vegetation clearing impacts

Clearing permit principles full assessment	
a) Native vegetation should not be cleared if it comprises a high level of biodiversity.	**Not at variance**

Assessment:

The site contains no understorey and an overstorey of *Agonis flexosa* species and is surrounded by cleared open paddocks and other pockets of *Agonis flexuosa*.

Given the lack of understorey and overstorey diversity both within and adjacent to the clearing area there is no risk of impacting on suitable habitat for any Threatened or Priority flora species.

Agonis flexuosa trees are known as habitat for the Western Ringtail Possum (*Pseudocheirus occidentalis*) which are listed as 'Critically Endangered' species under both the EPBC Act and the BC Act. The former Department of Environment, Water, Heritage and the Arts, now Department of Climate Change, Energy, the Environment and Water (DCCEEW) has published significant impact guidelines for the Western Ringtail Possum (DEWHA, 2009) to assist in determining if a proposal is likely to have a significant impact on the species. The location of the clearing subject to this assessment is within the 'supporting habitat' region of the Western Ringtail Possum. As a result, the clearing would be considered as potentially having a significant impact if:

- clearing in a remnant habitat patch that is greater than 0.5 hectares in size
- clearing of more than 50 per cent of a remnant habitat patch that is between 0.2 and 0.5 hectares in size, or
- fragmentation of existing habitat linkages.

Given the clearing is 0.12 ha and will not remove more than 50% of a habitat patch between 0.2 to 0.5ha (patch is greater than 1ha) and will not fragment existing habitat, the clearing will not exceed any of these significant impact thresholds for impacts to Western Ringtail Possum.

Agonis flexuosa trees are also not known to provide high value foraging or breeding habitat to any of the three protected Black Cockatoo species (DAWE, 2022) including the Carnaby's Cockatoo (*Zanda latirostris*), Baudin's Cockatoo (*Zanda baudinii*) and the Forest Red-tailed Black-cockatoo (*Calyptorhynchus banksii naso*).

In addition to the above, given the clearing area is not located near any conservation reserves, wetlands or areas of intact vegetation that would contain a high level of biological diversity, and the scale of clearing (0.12ha), the proposed clearing will not be at variance to this clearing principle.

b) Native vegetation should not be cleared if it comprises whole or part of, or is necessary for the maintenance of, a significant habitat for fauna.	**Not at variance**

Assessment:

As outlined above, *Agonis flexuosa* trees are known as habitat for the Western Ringtail Possum (*Pseudocheirus occidentalis*) which are listed as a 'Critically Endangered' species under both the EPBC Act, and the BC Act. DCCEEW has published significant impact guidelines for the Western Ringtail Possum (DEWHA, 2009) to assist in determining if a proposal is likely to have a significant impact on the species. The location of the clearing subject to this assessment is within the 'supporting habitat' region of the Western Ringtail Possum. As a result, the clearing would be considered as potentially having a significant impact if:

- clearing in a remnant habitat patch that is greater than 0.5 hectares in size
- clearing of more than 50 per cent of a remnant habitat patch that is between 0.2 and 0.5 hectares in size, or
- fragmentation of existing habitat linkages.

Given the clearing is 0.12 ha and will not remove more than 50% of a habitat patch between 0.2 to 0.5ha (patch is greater than 1ha) and will not fragment existing habitat then the clearing will not exceed any of these significant impact thresholds for impacts to Western Ringtail Possum.

Agonis flexuosa trees are also not known to provide high value foraging or breeding habitat to any of the three protected Black Cockatoo species (DCCEEW, 2022) including the Carnaby's Cockatoo (*Zanda latirostris*), Baudin's Cockatoo (*Zanda baudinii*) and the Forest Red-tailed Black-cockatoo (*Calyptorhynchus banksii naso*). Carnaby's have been observed stripping bark from *Agonis flexuosa* potentially searching for invertebrates (Valentine and Stock, 2008), however Agonis species are not listed as priority habitat in the Referral guideline for 3 WA threatened black cockatoo species (DCCEEW, 2022). There are also no known or suspected roost sites within 6km of the site. Given this and the scale of clearing proposed (0.12ha), the clearing is not likely to have an impact on these species.

Due to the lack of understorey and lack of tree species diversity, and the scale of clearing (0.12ha), it is unlikely that any other conservation significant fauna species would be reliant on the vegetation proposed to be cleared as significant habitat. As a result, the proposed clearing will not be at variance to this clearing principle.

c) Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora.	**Not at variance**

Assessment:

The site contains no understorey and an overstorey of *Agonis flexos*a species and is surrounded by cleared open paddocks and other pockets of *Agonis flexuosa*.

Given the lack of understorey both within and adjacent to the clearing area, there is no risk of impacting on any Threatened or Priority flora species or suitable habitat.

Therefore, clearing of 0.12 ha of an overstorey *Agonis flexuosa* trees will not be at variance to this clearing principle.

d) 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.	**Not at variance**

It is acknowledged that current DWER assessment process does not consider Commonwealth listed TECs that are not endorsed by the Western Australian Minister for Environment under this clearing principle. However, given that Government of Western Australia (2014) requires that these be assessed under principle (d), an assessment of potential impacts on Commonwealth listed TECs are included here to ensure compliance with CPS 1918/11 Condition 5(a).

Assessment:

There are 5 significant ecological communities within 10 km buffer from the clearing area, as detailed below:

- *Banksia Woodlands of the Swan Coastal Plain ecological community* – Endangered (EPBC Act). Known records nearby the clearing area.
- *Tuart (Eucalyptus gomphocephala) woodlands and forests of the Swan Coastal Plain* – Critically Endangered (EPBC Act), known records nearby the clearing area.
- *Subtropical and Temperate Coastal Saltmarsh* – Vulnerable (EPBC Act), unlikely to occur due to distance from survey area and lack of suitable soil.
- *Empodisma peatlands of southwestern Australia* – Endangered (EPBC Act), unlikely to occur due to no suitable habitat (wetlands) on or nearby site.
- *Clay Pans of the Swan Coastal Plain* - Endangered (EPBC Act), unlikely to occur due to no suitable habitat (wetlands) on or nearby site.

Based on the site photos and aerial imagery, only an overstorey of *Agonis flexuosa* exists on and adjacent the clearing area. This vegetation type is not reflective of any of the above TECs and as a result none of the above TECs are likely to occur on the site or be impacted by the proposed clearing. Therefore, clearing of 0.12ha of *Agonis flexuosa* trees will not be at variance to this clearing principle.

e) Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.	**Not at variance**

Assessment:

There is one pre-European vegetation association mapped across the survey area; vegetation association number 1136; Medium woodland; marri with some jarrah, wandoo, river gum and casuarina. This vegetation association has an extent remaining below the 30% threshold set by the EPA and below the 10% threshold for constrained areas.

Pre-European Vegetation Association	Scale	Pre-European extent (ha)	Current extent (ha)	Percent remaining	% Current Extent remaining in DBCA reserves (proportion of Current extent)
Vegetation Association No: 1136	**Statewide**	48,124.57	3,345.51	6.95	3.85
	IBRA Bioregion Swan Coastal Plain (SWA)	48,118.01	3,341.18	6.94	3.86

	IBRA Sub-region SWA02	48,118.01	3,341.18	6.94	3.86
	Local Government Authority City of Busselton	38,946.49	2,640.77	6.78	3.12

The Proposal is within a constrained area (Swan Coastal Plain), therefore retention objectives may be varied to "at least 10%".

In the Swan Coastal Plain (SWA02) IBRA Subregion, 6.94% of the pre-European extent remains. This percentage is lower than the 10% retention objective. However, due to the following reasons, the proposed clearing is not at variance with this Principle:

- The proposed clearing area has been previously cleared, and the current vegetation regrowth (*Agonis flexuosa* trees over cleared understorey) is no longer representative of the mapped vegetation association; and
- The clearing area (0.12 ha) comprises of <0.01% of the total pre-European vegetation extent and 0.2% of the current extent.

f) Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.	**Not at variance**

Assessment:

The proposed clearing area does not intersect any mapped wetlands or watercourses. A 'Multiple use' wetland is mapped adjacent to the south-east corner of the proposed clearing area, however this area contains no vegetation and is currently cleared paddock. The nearest mapped wetland with intact vegetation is a 'Resource Enhancement Wetland' located approximately 400m east of the clearing area.

The nearest Conservation Category Wetland is located approximately 650m north-east and the nearest Ramsar wetland (the Vasse-Wonnerup System) is located approximately 9.5km to the north-east of the clearing area. The nearest wetland identified as a 'Directory of Important Wetlands' is located approximately 6km to the north-east of the clearing area as part of the broader Vasse-Wonnerup wetland system.

The closest mapped watercourse is located approximately 600m south of the clearing area, however there appears to be a drain or minor watercourse approximately 40 - 50m south of the clearing area. Looking at historical aerial images, this watercourse appears to drain overflow water from the nearby open dam/wetland on an adjacent property that contains water in winter.

The proposed clearing consists of an overstorey of *Agonis flexuosa* with no understorey and therefore no wetland associated vegetation within or adjacent to the clearing area will be impacted.

Given the above and the scale of clearing (0.12ha), the proposed clearing is not at variance with this Principle.

g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.	**Not at variance**

Assessment:

The Proposal occurs within the Spearwood and Abba landscape systems, described as:

- Spearwood: sand dunes and plains. The soil in this zone is classified as yellow deep sands, pale deep sands and yellow/brown shallow sands (DPIRD-064).
- Abba: Poorly drained flats, on the southern Swan Coastal Plain. Grey deep sandy duplex and wet soil. Jarrah-marri-paperbark woodland (DPIRD-064).

The salinity of the groundwater within the proposed clearing area ranges between TDS 3,000 - 7,000 mg/L (DWER-026). Dewatering or deep excavation will not be required for the Proposal and therefore minimising the risk of soil salinity.

The nearest weather station is at Busselton Airport (009603) with recorded mean annual rainfall of 662.8 mm (BoM, 2025). Contour mapping indicates minimal slope, and given the scale of clearing required, it is not anticipated that the Proposal will cause any significant soil erosion.

In addition, Acid Sulfate Soil (ASS) Mapping (DWER-055) indicates moderate to low risk of ASS occurring within 3m of natural soil surface but high to moderate risk of ASS beyond 3m of natural soil surface. Given the proposed clearing

and subsequent development of the access track will not require any deep excavation beyond 3m of natural surface level the risk of encountering ASS is low.

The site has been mapped by DPIRD (DPIRD-016) as being in an area where 10-30% has a high to extreme wind erosion risk. However, given the scale of the proposed clearing (0.12 ha) which lies across a small section of previously cleared open paddock, it is unlikely that the Proposal will cause significant land degradation or be subject to significant wind erosion. In addition, Western Power's standard environment management measures will be implemented to address and residual wind erosion risk and other land degradation process.

The Proposal is not at variance to this Principle.

h) 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.	**Not at variance**

Assessment:

The proposed clearing area does not intersect with any known conservation areas. The nearest conservation area is Broadwater Nature reserve (R 27080) located approximately 1.8km north-east of the proposed clearing area.

The proposed clearing is not anticipated to have impact on the environmental values of the Broadwater Nature Reserve. Given the scale of the proposed clearing (0.12 ha), the proposed clearing is not anticipated to impact ecological connectivity or cause habitat fragmentation that could have any indirect impacts on the conservation area.

i) 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.	**Not at variance**

Assessment:

The Proposal does not intersect with Public Drinking Water Source Area (PDWSA) and any of the six *Country Areas Water Supply Act 1946* (CAWS Act) controlled catchment areas.

The salinity of the groundwater within the proposed clearing area rages between TDS 3,000 - 7,000 mg/L (DWER-026). Dewatering or deep excavation will not be required for the Proposal and therefore minimising the risk of soil salinity.

In addition, Acid Sulfate Soil (ASS) Mapping (DWER-055) indicates moderate to low risk of ASS occurring within 3m of natural soil surface but high to moderate risk of ASS beyond 3m of natural soil surface. Given the proposed clearing and subsequent development of the access track will not require any deep excavation beyond 3m of natural surface level the risk of encountering ASS is low.

As the vegetation is not representative of wetland surface water habitat, along with the degraded condition of the vegetation, and the small scale of the proposal (0.12 ha), the proposed clearing is not likely to be at variance with this principle.

j) Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.	**Not at variance**

Assessment:

The recorded mean annual rainfall in the area of the Proposal is 662.8mm (BoM, 2025).

The closest area to the proposed clearing area with a moderate to high risk of flooding, is 160m from the proposed clearing area (DPIRD-007). There is no watercourse with a flooding risk within the proposed clearing area. The closest waterbody to the proposed clearing area is a dam/stormwater storage water feature (700m north-west), however this waterbody is not identified with a risk of flooding (DPIRD-007).

Given the scale of the clearing (0.12 ha), and the proximity to flooding areas, the proposed clearing is not likely to cause, or exacerbate, the incidence or intensity of flooding. Hence, the proposed clearing is not at variance with this principle.

7. Planning instrument or other relevant matters

The proposal is located on land owned by Western Power, therefore, no access permissions or liaison with other landholders is required to undertake the works. The site is zoned as 'Public Purpose' under the City of Busselton Local Planning Scheme No. 21.

The Proposal (0.12 ha) is unlikely to have a significant environmental impact or generate significant public interest due to the small scale of the work. Therefore, referral to the Environmental Protection Authority (EPA) and Department of Climate Change, Energy, the Environment and Water (DCCEEW) is not required.

No historical heritage sites, Aboriginal heritage sites, or land subject to native title are located within the works so no additional approvals are required.

The associated effect on the environment is consistent with approved Environmental Protection Policies.

Land on which clearing is to occur is not subject to an agreement to reserve under the Soil and Land Conservation Act 1945.

8. Clearing Permit Details

Western Power manages impacts of clearing through the implementation of an internal Vegetation Clearing Permit. The Western Power Vegetation Clearing Permit outlining the relevant clearing conditions is available in CPS 1918/11. CPS 1918-11 - Purpose Permit and Decision Report.pdf

This vegetation clearing impact assessment has been undertaken in accordance with Purpose Permit CPS 1918/11, specifically Part II (5). As outlined above the proposed clearing will not be at variance to any of the ten clearing principles. As such a Clearing Assessment Report and Vegetation Management Plan are not required for the proposed clearing.

9. Post assessment requirements

Post assessment	Outcome	Justification / Further Action Required
Are submissions required?	No	No
Could the area be affected by dieback?	Yes	*Agonis flexuosa* is susceptible to dieback infection
Has advice been received from DWER or an environmental specialist that the area may be susceptible to a pathogen other than dieback?	No	No
Is a Vegetation Management Plan required?	No	Clearing is not at variance to any of the clearing principles. VMP not required in accordance with CPS 1918/11
Is rehabilitation/revegetation required?	No	Clearing less than 0.5ha (0.12ha)
Is a Dieback Management Plan required?	No	While *Agonis flexuosa* is susceptible to dieback infection the risk of increasing infection to nearby vegetation is low due to the sandy soils and minimal works area. Therefore standard Western Power hygiene measures will be implemented.

Is an offset required?	No	Clearing is not at variance to any of the clearing principles and is less than 0.5ha.
What is the clearing risk rating?	*Low*	**Low Risk – No clearing intervention required. Desktop pre-clearing evidence check only** • Clearing to be undertaken under CPS 1918 AND not at variance with any clearing principles • Any other clearing (e.g. clearing to be undertaken under exemption; clearing area <0.5h ha)

10. References

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