Title of Proposal - Commercial development of Lots 40, 408, 410 and 412 Edward Street, Kenwick

Section 1 - Summary of your proposed action

Provide a summary of your proposed action, including any consultations undertaken.

1.1 Project Industry Type

Commercial Development

1.2 Provide a detailed description of the proposed action, including all proposed activities.

MKSEA Pty Ltd (the proponent) propose to develop a number of adjacent land parcels within the suburb of Kenwick in Western Australia for light and general industrial land uses. These parcels (Lots 40, 408, 410 and 412 Edward Street) are located within the City of Gosnells (CoG) local government area and are hereafter referred to as the 'site'. The location of the site is shown in Figure 1 and the existing zoning of the site and immediately surrounding areas pursuant to the Metropolitan Region Scheme (MRS) is shown in Figure 2 (note that all figures are provided as Attachment A).

In conjunction with the CoG, the proponent has now received the necessary State and Local planning approvals to enable development within the site to proceed. The specific types of land uses intended within the development include warehousing, logistics, general and light industry. The land uses proposed within the site do not include heavy industry, extractive or noxious industry types.

'Warehousing', 'logistics', 'industrial development', 'light industrial development' or similar labels are not available as options from the drop-down list of land uses in the DoEE's online Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) referral portal. 'Commercial development' is the best fit based on available choices and so hereafter the proposed action is described as a 'commercial' development.

The site has been historically cleared to support former agricultural and rural-residential land uses. The vegetation that remains within the site is limited to stands of predominantly planted, non-native trees with very occasional native trees in a completely degraded/parkland cleared setting.

To facilitate commercial development of the site, the following activities will be required:
• Bulk earthworks, including the importation of fill across the site to achieve suitable separation from groundwater and major flood events, and to facilitate the alteration of the current road network.
• Civil construction, including the construction of a drainage basin, retaining walls, roads, pedestrian paths and the installation of services, such as power, gas and water.

One ‘matter of national environmental significance’ (MNES) is relevant for the site due to the presence of a known night ‘roost’ for Calyptorhynchus banksii naso (forest red tailed black cockatoo (FRTBC)). FRTBCs are listed as a ‘vulnerable’ threatened species under the EPBC Act. No other MNES are considered to have the potential to be impacted by the proposed action (refer to Attachment B).
A FRTBC roost is defined by the DoEE (2017b) as ‘a group or larger scattering of trees, where there are records or recent evidence of night roosting’.

The FRTBC roost within the site is comprised of a variety of trees as outlined in Table 1.
Table 1: Number of trees by species that form part of the roost within the site

Species (No. in roost)
*Corymbia maculata (1)
*Eucalyptus botryoides (5
*Eucalyptus camaldulensis (128)
*Eucalyptus sp. (12)
Eucalyptus rudis (41)
Total = 187
Asterisk ‘*’ indicates species not local native.

The roost has been identified as where the majority of FRTBCs have been observed roosting. The area of the roost extends over approximately 1.5 ha and is comprised of 187 trees that are predominantly *Eucalyptus camaldulensis (river red gum). River red gum is an Australian native, but is not a local native to the site or the Swan Coastal Plain within Western Australia.

A valid subdivision approval is in place which would have enabled the clearing of all vegetation within the site. Following the identification of the roost within the site, the proponent has modified the subdivision layout to avoid impacts and preserve the function of the roost by enabling ongoing roosting activity within the site.

The revised layout retains 72% of the vegetation within the roost area within a proposed drainage basin as shown in Figure 3. The construction and subsequent operation of the drainage basin has a low potential to impact to the roost vegetation, as river red gum is a riparian species that is well adapted to frequent episodic inundation (ANBG 2018).

The Conservation Strategy for MKSEA Precinct 3A prepared by the proponent proposes that 1160 FRTBC foraging trees are planted within the site, FRTBC foraging trees are planted across Precinct 3A, 9,000 native plants are planted in a nearby conservation reserve managed by the State government (Bush Forever Site 387 Greater Brixton St Wetlands) and 540 trees are planted in a nearby reserve managed by the CoG (Woodlupine Brook Reserve) ((Linc Property 2018) refer Attachment C).

1.3 What is the extent and location of your proposed action? Use the polygon tool on the map below to mark the location of your proposed action.

Area	Point	Latitude	Longitude
The site	1	-32.011504918993	115.97527718804
The site	2	-32.011500370409	115.975263777
The site	3	-32.011509467706	115.97527450583
The site	4	-32.013465393583	115.97760266326
The site	5	-32.016267298384	115.97402996085
The site	6	-32.016085359115	115.97385829947
The site	7	-32.011973435295	115.97480243705
The site	8	-32.011504918993	115.97527718804

1.5 Provide a brief physical description of the property on which the proposed action will take place and the location of the proposed action (e.g. proximity to major towns, or for off-shore actions, shortest distance to mainland).

The site is situated 12 km south-east of the Perth Central Business District, within the locality of Kenwick and the local government area of the CoG. The site is generally located between Roe Highway and the adjacent freight railway line to the west, Edward Street to the northeast and existing rural-residential lots to the south and east.

In a broader context, the site is surrounded by a variety of land uses, including:

- Greater Brixton Street Wetlands (GBSW), including Bush Forever Site 387 (approximately 590 m from the site)
- Yule Brook (approximately 450 m from the site)
- Woodlupine Brook Reserve (approximately 500 m from the site)
- A number of major arterial roads, including Tonkin Highway, Welshpool Road and Orrong Road
- The proposed location for the future Kenwick Rail Freight Facility which will be located directly adjacent to the western boundary of the site, which will be constructed and operated by the Western Australian Public Transport Authority (PTA).
- A variety of residential, rural-residential and small-scale agricultural land uses.

The location of the site and these features are shown in **Figure 1**.

1.6 What is the size of the proposed action area development footprint (or work area) including disturbance footprint and avoidance footprint (if relevant)?

8.3721

1.7 Is the proposed action a street address or lot?

Lot

1.7.2 Describe the lot number and title. Lot 40 (Plan 31229),Lot 408 (Plan 409725),Lot 410 (Plan 409726),Lot 412 (Plan 409727) Edward Street

1.8 Primary Jurisdiction.

Western Australia

1.9 Has the person proposing to take the action received any Australian Government grant funding to undertake this project?

No

1.10 Is the proposed action subject to local government planning approval?

Yes

1.10.1 Is there a local government area and council contact for the proposal?

Yes

1.10.1.0 Council contact officer details

1.10.1.1 Name of relevant council contact officer.

Donna Shaw (Acting Manager Planning Implementation)

1.10.1.2 E-mail

dshaw@gosnells.wa.gov.au

1.10.1.3 Telephone Number

(08) 9397 3181

1.11 Provide an estimated start and estimated end date for the proposed action.

Start date 12/2018

End date 03/2019

1.12 Provide details of the context, planning framework and State and/or Local government requirements.

The site is situated within Precinct 3A of the Maddington Kenwick Strategic Employment Area (MKSEA), which has been identified as a future industrial/light industrial area since the late 1990s. MKSEA has historically been characterised by rural residential land use and fragmented land ownership.

A large proportion of Precinct 3A of MKSEA, including the site, was progressively acquired by the proponent over 2016 and 2017 to enable development for industrial (freight, warehousing and logistics) purposes. Figure 1 shows the extent of the MKSEA precincts relative to the site.

MKSEA is viewed as an ideal location for logistics and freight based commercial activities, given its proximity to major transport and freight routes, and the existing Welshpool and Perth Airport industrial areas. MKSEA has also had strategic planning significance at a State level, and was identified in the Western Australian Planning Commission's (2012) Economic and Employment Land Strategy: Non Heavy Commercial as an important future industrial area.

Based on the outcomes of this strategy, the Draft Perth and Peel@3.5 Million strategic planning document (WAPC 2015b) and the associated Draft South Metropolitan Peel Sub-regional Planning Framework (WAPC 2015a), were subsequently prepared and have also identified MKSEA for 'industrial expansion'.

In order to enable development within the site, an amendment to the Metropolitan Region Scheme (MRS Amendment 1302/57) was initiated by the Western Australia Planning Commission (WAPC) to rezone the land from 'rural' to 'industrial' in 2015. The rezoning was approved by the Minister for Planning in October 2016.

At a local government level, the CoG has also recognised the area as a short term strategic economic and employment priority, and has actively progressed and supported the necessary planning approvals to promote rezoning within MKSEA. This has involved an amendment (Amendment 165) to the CoG Town Planning Scheme (TPS) No. 6 to rezone the land incorporating the site from 'general rural' to 'general industry' which was approved in December 2016.

MKSEA Precinct 3A Structure Plan (incorporating the site) was approved by the WAPC on 25 August 2017 and the physical development of the site (i.e. the proposed action) will be implemented pursuant to an existing subdivision approval (WAPC reference number 154761).

1.13 Describe any public consultation that has been, is being or will be undertaken, including with Indigenous stakeholders.

Given the strategic importance of MKSEA at both a State and Local government level, extensive public consultation has been undertaken to date as part of the planning process.

Public consultation on the 'general industrial' land use planned for MKSEA has included the following opportunities:

- Public comment period for the *Economic and Employment Land Strategy: Non Heavy Industrial* (WAPC 2012).

- Public comment period for the *Draft Perth and Peel@3.5 Million* suite of strategic planning documents (WAPC 2015b) and the associated *Draft South Metropolitan Peel Sub-regional Planning Framework* (WAPC 2015a).

- Public comment period for *MKSEA Indicative Local Structure Plan – September 2015*. This has involved a number of iterations to the plan and development of various concept plans, with public comment periods for each iteration occurring between 2007 and 2015.

Public consultation opportunities to comment more specifically on the proposed commercial development of the site and Precinct 3A of MKSEA has included:

- A 60 day public comment period for MRS Amendments 1302/57 between November 2015 and January 2016, as advertised by the (former) Department of Planning.• A 42 day public comment period for CoG TPS no. 6 Amendment 165 between and July and September 2016.

- A 42 day public comment period for the draft *MKSEA Precinct 3A Structure Plan* between and July and September 2016. In addition, following identification of the roost in April 2017, opportunities to comment specifically on the FRTBC roost within the site (i.e. the relevant potential MNES for this referral) has included items outlined in Table 2.

Table 2: Proponent led consultation opportunities to comment specifically on the FRTBC roost within the site

Date and consultation item
18-Jan-18 The proponent met with Peter Newman, Hugh Finn, Angela Gaynor and Patricia Harris from The Beeliar Group on 18 January 2018 to discuss the strategy for the development of the site, in the context of broader development of MKSEA and a range of environmental issues including the FRTBC roost within the site.
27-Feb-18 The proponent commenced investigations and monitoring of the roost within the site and the wider local area to gain a better understanding of the FRTBC activity .
8-Apr-18

The Great Cocky Count occurred on 8th April 2018 in which results indicated the 334 FRTBCs were present at the roost within the site.

20-Apr-18

The proponent met with Hugh Finn and Katy Evans from The Beeliar Group on 20 April 2018 to discuss the options for avoiding impacts to the roost within the site.

30-Apr-18

The proponent obtained survey pick up data for all trees within the site on 30 April 2018.

The proponent commenced detailed reviews of the proposed development layout to increase tree retention and avoid impacts to the roost on 30 April 2018.

The proponent met with Hans Lambers and Bruce Armstrong from The Beeliar Group on 30 April 2018 to discuss preliminary findings and discuss the water management within the development within Precinct 3A and the evolving strategy for conservation of the roost within the site. The proponent subsequently issued a document outlining how the proposed action aligned with the Beeliar Group's "A vision for conservation and public enjoyment of the Greater Brixton Street Wetlands and an eventual Yule Brook Regional Park" and submitted this on the 2 May 2018.

1-May-18

The proponent met with officers from the OEPA (DWER) and DPaW on 1 May 2018 for a site visit to show them the roost within the site and outline the results of the investigations and monitoring completed to date.

The proponent met with Adam Peck from Birdlife Australia on 1 May 2018 to discuss the investigations and completed monitoring completed to date and the evolving strategy for conservation of the roost within the site.

The proponent spoke to Tyrie Starrs DEE to inform him of the current status of environmental issues relevant to Precinct 3A including the roost within the site and provided the list of stakeholders contacted to date.

2-May-18

The proponent attended a community group meeting held by Birdlife Australia on 2 May 2018 to gain better understanding of local environmental issues and community concerns.

4-May-18

The proponent met with Dr Kris Warrant of Murdoch University to discuss the roost within the site and associated expert advice. Correspondence provided to the proponent following this meeting is provided in Attachment C.

7-May-18

The proponent met with representatives from the City of Gosnells on site to walk through the roost area.

8-May-18

The proponent met with Ron Johnstone from WA Museum to seek expert advice on FRTBCs and the management of the roost within the site. Correspondence provided to the proponent following this meeting is provided in Attachment C.

The proponent met with Georgia Kerr of Kaarakin and presented the proposed conservation strategy.

9-May-18

The proponent met with Amy Krupa of South East Regional Centre for Urban Landcare (SERCUL).

The proponent met with representatives from the City of Kalamunda on site to walk through the roost.

The proponent issued a draft conservation strategy to all the community and government groups to seek their feedback. The final version of the conservation strategy is provided as Attachment D.

10-May-18

Murdoch University issued a proposal to the proponent for the “Conservation management of the forest red-tailed black cockatoos associated with the Maddington-Kenwick Strategic Employment Area Precinct 3 industrial (freight, warehousing and logistics) development”.

16-May-18

The proponent received a letter from Associate Professor Kristin Warren from Murdoch University indicating that the proposed action will preserve the function of the roost within the site (Attachment C).

22-May-18

The proponent received a letter from Ron Johnstone from the WA Museum indicating that the proposed action will not affect the sustainability of foraging and roosting habitat for FRTBCs in the future (provided in Attachment C).

In summary, continued public consultation has been undertaken by the State government, the

CoG and the proponent. This has provided the public various opportunities to comment on both industrial zoning and development of MKSEA, and more directly on the proposed commercial development layout within the site and associated proposed action.

1.14 Describe any environmental impact assessments that have been or will be carried out under Commonwealth, State or Territory legislation including relevant impacts of the project.

The proposed commercial development of the site (and any associated environmental impacts) have been considered on a number of occasions to support various regional and local planning processes.

These are summarised below:

Draft Perth and Peel Green Growth Plan for 3.5 million

As discussed above, the Draft Perth and Peel@3.5 Million strategic planning document (WAPC 2015b) and the associated Draft South Metropolitan Peel Sub-regional Planning Framework (WAPC 2015a) identify the site and wider MKSEA area for future industrial land uses. This is the result of a comprehensive regional planning exercise completed by the Department of Planning, Lands and Heritage (DPLH) to strategically locate industrial land (in addition to other uses, such as residential and infrastructure) across the Perth and Peel regions. A key consideration of this process has been to avoid significant environmental impacts where possible and practical, through the strategic location of future intensive land uses away from known environmental features of significance. Based on the outcomes of this exercise, the site and wider MKSEA were identified for commercial/industrial development.

Concurrently with the above, the Department of Premier and Cabinet have prepared the Draft Perth and Peel Green Growth Plan for 3.5 million (Draft GGP) which considers the residual environmental impacts of the future land uses proposed in the Draft Perth and Peel@3.5 Million suite of strategic planning documents. This has involved the identification of ‘specific commitments’ and ‘broad commitments’ where environmental values have been identified as requiring further consideration through the future development process.

No specific commitments or broad commitments are identified within the site in these draft documents.

MRS Amendment 1302/57

Under Section 48 of the Western Australia Environmental Protection Act 1986 (EP Act), all proposed amendments to regional and local planning schemes are referred to the Environmental Protection Authority (EPA) for consideration to determine whether a formal assessment is required under Part IV of the EP Act. MRS Amendment 1302/57, which incorporates the site, was referred to the EPA on this basis.

The EPA advised that the amendment was unlikely to have a significant effect on the

environment and did not warrant formal assessment pursuant to the EP Act. The EPA outlined that it was of the view point that the potential impacts from the amendment could be adequately managed through local scheme provisions to be included in the CoG TPS no. 6, a process which would be facilitated through the subsequent local scheme amendment stage.

In addition, the EPA advised that the environmental factors relevant to the amendment related primarily to natural areas adjacent to Yule Brook (outside of and to the south of the site). On this basis, there were no environmental factors within the site which were identified or raised by the EPA during their consideration of the amendment.

CoG TPS no. 6 Amendment 165

Subsequently, CoG Amendment 165 was referred to the EPA under Section 48 of the EP Act. The EPA advised that the environmental impacts on the amendment were not significant as to warrant formal assessment pursuant to the EP Act.

The EPA advised that the primary environmental factors relevant to the amendment related to existing vegetation which may provide habitat for black cockatoos, in addition to existing wetlands and associated wetland vegetation directly adjacent to the amendment area. It is noted that the fauna habitat values referred to by the EPA are applicable to the site; however, the noted wetlands are generally inapplicable to the site given their location.

The EPA recommended that these environmental factors be addressed through the planning process and recommended a number of local scheme provisions on this basis. These provisions primarily relate to requirements for various environmental investigations and associated documentation to support the structure planning process, which have since been undertaken and included within the CoG TPS No. 6.

In summary, the following have been undertaken to address the issues raised by the EPA:

- A detailed Local Water Management Strategy (LWMS) prepared to support structure planning that specifically addressed water balance considerations (in relation to the downstream receiving environmental receptors) which was prepared to the satisfaction of the then Department of Water and accommodating advice from the then Department of Parks and Wildlife.

- Investigations to support structure planning to examine the occurrences of Eucalyptus gomphocephala to enable an assessment of their significance, prepared on the advice of and to the satisfaction of the EPA.

- Additional fauna survey to ultimately inform a fauna management plan on advice from the Department of Parks and Wildlife (now Department of Biodiversity, Conservation and Attractions) to support subdivision works. It is this additional survey that has informed this referral and approach to managing the roost identified within the site, although this roost wasn't formally known at the time the EPA advice was issued.

1.15 Is this action part of a staged development (or a component of a larger project)?

Yes

1.15.1 Provide information about the larger action and details of any interdependency between the stages/components and the larger action.

The proponent has progressively acquired a number of small landholdings within MKSEA Precinct 3A. The intention has been to aggregate these smaller landholdings to enable commercial development at a scale that is financially feasible. The acquisition and settlement of these landholdings has occurred over a number of years since 2016, as each have required separate negotiation and sale processes with independent vendors, which have progressed at different times.

The proponent recently settled the acquisition of six (6) additional lots on Coldwell Road (Lots 7 to 12), which are not immediately adjacent to the site, and have not been subject to any development activities to date. These lots have not been included in this referral as the exclusion of this area will not materially change the MNES impact considerations associated with the referral of the proposed action.

1.16 Is the proposed action related to other actions or proposals in the region?

No

Section 2 - Matters of National Environmental Significance

Describe the affected area and the likely impacts of the proposal, emphasising the relevant matters protected by the EPBC Act. Refer to relevant maps as appropriate. The interactive map tool can help determine whether matters of national environmental significance or other matters protected by the EPBC Act are likely to occur in your area of interest. Consideration of likely impacts should include both direct and indirect impacts.

Your assessment of likely impacts should consider whether a bioregional plan is relevant to your proposal. The following resources can assist you in your assessment of likely impacts:

• Profiles of relevant species/communities (where available), that will assist in the identification of whether there is likely to be a significant impact on them if the proposal proceeds;

• Significant Impact Guidelines 1.1 – Matters of National Environmental Significance;

• Significant Impact Guideline 1.2 – Actions on, or impacting upon, Commonwealth land and Actions by Commonwealth Agencies.

2.1 Is the proposed action likely to have ANY direct or indirect impact on the values of any World Heritage properties?

No

2.2 Is the proposed action likely to have ANY direct or indirect impact on the values of any National Heritage places?

No

2.3 Is the proposed action likely to have ANY direct or indirect impact on the ecological character of a Ramsar wetland?

No

2.4 Is the proposed action likely to have ANY direct or indirect impact on the members of any listed species or any threatened ecological community, or their habitat?

Yes

2.4.1 Impact table

Species	Impact
Calyptorhynchus banksii naso (Forest red-tailed	The site contains a night roost that is known to

Species	Impact
black cockatoo)	be used by FRTBCs which are listed as a vulnerable threatened species under the EPBC Act. The proposed action will necessitate the removal of some vegetation that comprises a known roosting site, specifically 27.7% of trees that make up the roost and 28.0% of the roost by area (approximately 30%). The trees that comprise the roost are predominantly non-native eucalypts and most are *Eucalyptus camaldulensis (river red gum). Four (4) potential habitat trees were recorded within the site of which none were observed to contain any hollows. Three of these trees are Eucalyptus Rudis (flooded gums), which are not considered preferred habitat trees for FRTBC (Harewood 2015; Bamford Consulting Ecologists 2017). The fourth is a marri tree located within the Edwards St road reserve. Expert advice identified that the roost trees within the site provide negligible foraging habitat for FRTBCs (Bamford Consulting Ecologists 2017). At least 13 alternative confirmed FRTBC roosts known within 9 km radius of the site. Based on the recent monitoring and regional studies of FRTBCs, roosting activity within and adjacent to the site is expected to be variable. It is not possible to predict whether the roost within the site will be favoured or relied upon by FRTBCs in the longer term as many factors influence FRTBC occurrence at local scale. DoEE (2017a) states that the complete clearance of roost sites that are close to high quality foraging habitat and water resources in non-breeding areas is likely to result in a significant impact. Only a small portion of the trees that make up the roost are proposed to be removed and the function of the roost will be maintained. Advice received from FRTBC experts at Murdoch University and the WA Museum is provided as Attachment C which confirms the view that the proposed action will preserve the functionality of the roost within the site and maintain sustainable foraging and roosting habit for FRTBCs in the future. The impact is therefore not considered significant. Based on the above, the proposed

Species	Impact
	action is not considered to represent a significant impact on this species with regard to the Significant Impact Guidelines 1.1 – Matters of National Environmental Significance, as discussed further in Section 5.2. Nonetheless, as a modification to roost habitat is proposed, it was deemed the proposed action warranted referral to the DoEE (DoEE 2012, 2017b).
Other potential MNES	Beyond FRTBCs, the range of MNES that could potentially occur within the site and wider local area were identified from EPBC Act Protected Matters Report 7QI38S. A total of three listed TECs, 41 listed threatened species, 9 listed migratory species and 15 listed marine species may occur or have habitat that occurs within 5 km of the site. The potential for the proposed action to have any impact on any of these MNES, as well as other species or communities of conservation significance, has been thoroughly reviewed in technical reports prepared to inform structure planning for Precinct 3A (Douglas Partners 2016; Emerge Associates 2016; Harewood 2016; Emerge Associates 2017). Some listed species, listed species habitat and threatened ecological communities (TECs) occur in the wider local area at a distance of 500 m or greater from the site (Emerge Associates 2016; Harewood 2016). As outlined in Attachment B the proposed action will not impact any of these MNES.

2.4.2 Do you consider this impact to be significant?

No

2.5 Is the proposed action likely to have ANY direct or indirect impact on the members of any listed migratory species, or their habitat?

No

2.6 Is the proposed action to be undertaken in a marine environment (outside Commonwealth marine areas)?

No

2.7 Is the proposed action to be taken on or near Commonwealth land?

No

2.8 Is the proposed action taking place in the Great Barrier Reef Marine Park?

No

2.9 Is the proposed action likely to have ANY direct or indirect impact on a water resource related to coal/gas/mining?

No

2.10 Is the proposed action a nuclear action?

No

2.11 Is the proposed action to be taken by the Commonwealth agency?

No

2.12 Is the proposed action to be undertaken in a Commonwealth Heritage Place Overseas?

No

2.13 Is the proposed action likely to have ANY direct or indirect impact on any part of the environment in the Commonwealth marine area?

No

Section 3 - Description of the project area

Provide a description of the project area and the affected area, including information about the following features (where relevant to the project area and/or affected area, and to the extent not otherwise addressed in Section 2).

3.1 Describe the flora and fauna relevant to the project area.

3.1.1 Flora

Three flora and vegetation surveys incorporating the site have been previously undertaken, including:

- MKSEA Environmental Review: Flora, Vegetation, Fauna and Wetlands (Cardno BSD 2005)
- The Flora, Vegetation and Wetlands of MKSEA (Tauss and Weston 2010)
- Flora and Vegetation Assessment MKSEA Precinct 3A (Emerge Associates 2016).

Based on the findings of the most recent Emerge Associates (2016) survey, the vegetation within the site is dominated by planted predominantly non-native tree species and non-native annual and perennial pasture weeds. The majority of the trees within the site are river red gum which is an Australian native but is not native to the Swan Coastal Plain. Vegetation condition is ‘completely degraded’ (Emerge Associates 2016). No conservation significant flora species were recorded or considered likely to occur in the site.

Four remnant patches of ‘shrublands and woodlands on Muchea Limestone of the Swan Coastal Plain’ TEC occur approximately 500 m to the south of the site on the north side of Yule Brook (associated with the UFI 7635 feature shown in Figure 4). This TEC is listed under the EPBC Act but was not identified in EPBC Act Protected Matters Report 7QI38S. These patches extend over approximately 2.4 ha. The water sensitive design adopted by the proponent (see Figure 4) will ensure that the potential for direct or indirect impacts to these patches of TEC are avoided. This was a key consideration and requirement adopted in preparing the Local Water Management Strategy and the Urban Water Management Plan for development within the site.

3.1.2 Fauna

Four fauna surveys incorporating the site have previously been completed, including:

- MKSEA Environmental Review: Flora, Vegetation, Fauna and Wetlands (Cardno BSD 2005)

- Black Cockatoo Survey – MKSEA (360 Environmental 2012)
- Fauna Assessment MKEA Precinct 3 (Harewood 2016)
- Black-cockatoo values of the Maddington Kenwick Strategic Employment Area (MKSEA) Precinct 3A Referral Area (Kenwick/Wattle Grove)(Bamford Consulting Ecologists 2017)

In addition the Great Cocky Count identified a roost within the site in April 2017 (Peck et al. 2017a) and April 2018 (A. Peck, Birdlife Australia, pers. comm. April 2018). A FRTBC roost monitoring survey within the site and surrounding areas commissioned by the proponent in 2018 is ongoing. A summary of monitoring results to date is proved in Table 4. The results demonstrate that the use of the roost has fluctuated in numbers over time. Further detailed studies are proposed to provide a better long term understanding of the roost and FRTBC activity in the site and the wider local area, as detailed in the Conservation Strategy for MKSEA Precinct 3A (Linc Property 2018) (provided as Attachment D).

Table 4: Summary of monitoring data

Recorder	**Date**	**No. FRTBCs roosting in the site**
360 Environmental (2012)	(23-25)/07/2012	0
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Harewood (2016)	9/12/2015	0
---	---	---
Great Cocky Count 2017	9/04/2017	

51

Bamford Consulting Ecologists (2017)

(7-8)/11/2017

20-30#

Great Cocky Count 2018

8/04/2018

334

Emerge Associates ongoing

10/04/2018

335

8/05/2018

49

15/05/2018

92

22/05/2018

68

#Count is rough estimate only

Previous surveys

The Cardno BSD (2005) survey involved the identification of all fauna species which could

potentially occur within the wider MKSEA, based on existing habitat values, in addition to the recording of opportunistic fauna observations. The report identified the potential for three threatened species of black cockatoo to potentially utilise the wider MKSEA (incorporating the site) based on the identified habitat values.

The CoG subsequently commissioned 360 Environmental (2012) to undertake a targeted black cockatoo survey across the wider MKSEA. 360 Environmental (2012) identified a number of potential black cockatoo habitat trees during the assessment, of which none were located within the site. Black cockatoo night roosting was inferred in three areas located outside of the site by 360 Environmental (2012) shown in Figure 5.

An additional fauna assessment for the site was undertaken for the Precinct 3 area of MKSEA by consulting zoologist Greg Harewood in December 2015 (Harewood 2016). This fauna assessment indicated that the site and wider Precinct 3A was historically largely cleared and that fauna habitat values have been significantly disturbed (Harewood 2016). As a consequence, the diversity of fauna species present within the site prior to disturbance has been dramatically reduced, and overall the site and the vegetation within the site has limited significance for fauna. Other than FRTBCs, no other threatened species were considered to occur or rely on habitat within the site or immediately surrounding areas. Harewood (2016) did not identify any evidence of black cockatoo roosting during the assessment (including the locations previously reported by 360 Environmental (2012)). Three potential habitat trees were recorded within the site. However, none were observed to have hollows, and all were Eucalyptus rudis species which are not considered preferred habitat trees for FRTBC.

Bamford Consulting Ecologists (2017) completed a targeted assessment of black cockatoo habitat within the area to the west of Edward Street within MKSEA Precinct 3A in August 2017. A very small area of FRTBC foraging habitat in the form of marri trees was identified within the site along the Edwards Street road reserve (Bamford Consulting Ecologists 2017). The river red gum and non-native eucalypt canopy within the site was assessed as having negligible foraging value for FRTBCs. The roost was confirmed within the site with the number of FRTBCs using the roost at the time was estimated at 20 to 30. One potential habitat tree was identified within the site in addition to the three E. rudis previously identified by Harewood (2016). This tree was a marri without hollows located within the Edward Street road reserve. Although this tree meets the criteria to be defined as a potential habitat tree, it does not contain hollows suitable for use by FRTBCs and would therefore not currently support FRTBC breeding.

Great Cocky Count

The Great Cocky Count is an annual community volunteer based survey of black cockatoo roosting locations in the south-west of Western Australia that has been coordinated by Birdlife Australia since 2010. The 2017 Great Cocky Count was completed on 9 April 2017 and 51 FRTBCs were recorded roosting within the site (Peck et al. 2017b). This roosting location, which was labelled GOSKENR001, had not previously been identified in any previous iterations of the Great Cocky Count and was a new survey location introduced for the 2017 Great Cocky Count survey, as shown in Figure 6.

The 2018 Great Cocky Count was undertaken on 8 April 2018 with results provided by Birdlife

Australia indicating 334 FRTBCs were recorded roosting within the GOSKENR001 (pers. comm. Adam Peck, Birdlife Australia 2018). Preliminary data from the 2018 GCC indicates that GOSKENR001 was the fourth largest roost recorded in the 2018 GCC (A. Peck, Birdlife Australia, pers. comm. April 2018). The data, as well as data from previous GCCs, indicates substantial fluctuation in roost numbers for GCC registered sites between years, and not all roosts are used every year (Peck et al. 2017b).

During the 2018 Great cocky Count an additional 72 FRTBCs were recorded roosting nearby within trees on lots adjacent to Grove Road. This separate roost area is located outside of the site approximately 300m to the east, and is labelled GOSKENR002 in Great Cocky Count dataset, as shown in Figure 6.

The site is situated in relatively close proximity to other FRTBC roosts, with 13 confirmed roosting locations within nine km as shown in Figure 6.

Great Cocky Count data indicates there has been gradual redistribution of FRTBCs from the Darling Plateau to the Swan Coastal Plain which has resulted in an increase in FRTBCs recorded on the Swan Coastal Plain. The increase has been explained as being due to FRTBCs discovering new foraging habitat on the Swan Coastal Plain, particularly in urban areas (Peck et al. 2017a).

Recent roost monitoring and FRTBC habitat assessment

Regular roost monitoring was undertaken in 2018 to verify FRTBC activity within the site and surrounding areas. Surveillance of the roost with the site (GOSKENR001), the adjacent roost along Grove Road (GOSKENR002) and other roosts within the wider local area identified ongoing occurrence of FRTBCs as shown in Figure 6. Within the GOSKENR001, FRTBC movements were varied but the majority were recorded roosting over a 1.50 ha area which was used to define the boundary of the GOSKENR001 roost as shown in Figure 5. Trees within the site were surveyed and the roost area was determined to comprise 187 trees which were primarily planted, non-native eucalypts such as *Eucalyptus camaldulensis.

Targeted surveys of FRTBCs roosting in GOSKENR001 recorded variability in the number of FRTBCs. A survey two days after the 2018 GCC recorded a similar number of FRTBCs (335 compared to 334 in the 2018 GCC), but subsequent surveys in May 2018 recorded much lower numbers of FRTBCs (49 to 95). This supports the variability of FRTBC roost usage as found in GCC surveys (Peck et al. 2017a), and the future use of GOSKENR001 by FRTBCs, including the defined roosting area, may be subject to change.

FRTBCs are understood to generally be foraging on vegetation located within urban residential, parks and recreation and rural residential areas surrounding the site. FRTBC foraging resources were inferred based on an analysis of regional plant communities known to contain the primary FRTBC foraging species of marri and/or jarrah (Heddle et al. 1980) native vegetation extent (DAFWA 2016) and more generally with urban, rural and parks and recreation zoned land as shown in Figure 6.

One previously confirmed FRTBC breeding tree is located approximately 2 km south-west of the

site, within the Brixton Street Wetlands as shown in Figure 6. No other confirmed FRTBC breeding trees are known in the wider local area.

3.2 Describe the hydrology relevant to the project area (including water flows).

The Urban Water Management Plan for MKSEA Precinct 3A has been approved by the City of Gosnells and City of Kalamunda and demonstrates that:

- Pre-development water volumes and flows are maintained to the Yule Brook and wetlands.

- Pre-development groundwater conditions and controls are maintained post-development.

- Groundwater and surface water quality entering the water bodies are maintained or improved.

3.2.1 Groundwater

Groundwater monitoring across the site and the wider MKSEA was undertaken for 18 months from July 2009 (Endemic 2012). Subsequently an additional nine bores were installed within and adjacent to the site in June 2016 as part of an ongoing monitoring programme to provide greater coverage and resolution of groundwater data (Emerge Associates 2017).

Based on the results of the groundwater monitoring program to date, predicted maximum groundwater levels (MGL) across the site range between 10 m AHD near the northern boundary and 8.5 m AHD near the southern boundary, and are shallow beneath most of the site ranging between 0.5 m and 1.5 m below the existing ground surface, as shown in Figure 4. Given the low permeability clay soils, the MGL is considered to be a reflection of seasonally perched groundwater rather than a permanent superficial aquifer, but are generally deeper (as predicted MGL) within the site compared to most other areas of MKSEA. Groundwater generally flows in a southwest direction under the site, parallel to Yule Brook and away from the Greater Brixton Street Wetlands.

3.2.2 Surface Water

The site is generally flat as shown in Figure 7 and does not contain any natural surface water features as shown in Figure 4. However, the site is located within the Yule Brook catchment, with the Yule Brook waterway located 450 m south east of the site. The Yule Brook provides a hydrological separation (of surface water catchments) between the site and the Greater Brixton Street Wetlands. As such, the existing surface water regime of the site does not interact with the Greater Brixton Street Wetlands. The Yule Brook conveys flows west and ultimately to the Canning River.

A drainage line is located within the site, which conveys minor event surface water runoff toward Yule Brook as shown in Figure 4. As part of planning for development (including the proposed

action within the site) the pre and post development flows within this drainage line will be maintained, and this is a key underpinning principle in both the approved Local Water Management Strategy and the approved Urban Water Management Plan.

The development has implemented a multitude of water sensitive design outcomes, such as:

- At source surface water treatment on the lots. Each lot is mandated to control flows and provide treatment before exiting the lot.

- Vegetated road side swales to strip nutrients at source and to provide volume storage, which will help to maintain the water balance for the site.

- Implementing vegetation that requires minimal water and fertilizing.

- Construction of a vegetated drainage basin to control larger flow events before exiting the site.

The water management program outlined in the Conservation Strategy for MKSEA Precinct 3A document will improve groundwater and surface water quality entering the local water bodies as outlined in Attachment D.

3.2.3 Wetlands

The Department of Biodiversity, Conservation and Attractions (DBCA) Geomorphic Wetlands of the Swan Coastal Plain dataset identifies the site as comprising a palusplain ‘multiple use’ wetland. Palusplain wetlands are characterised by seasonal waterlogging and do not typically exhibit permanent or significant surface water features. The presence of palusplain wetlands generally indicates minimal separation between expressions of groundwater and natural surface levels, which is known to occur across the site. Wetlands assigned as ‘multiple use’ by the DBCA are typically those which are not considered to be of conservation significance.

3.3 Describe the soil and vegetation characteristics relevant to the project area.

3.3.1 Soil

The site is situated on the Pinjarra Plain, in the eastern extent of the Swan Coastal Plain, which is an alluvial zone consisting of clayey alluvium that has been transported by rivers and streams from the adjacent Darling Escarpment (McPherson and Jones 2005).

The Geological Survey of Western Australia, as documented in Perth Metropolitan Region 1:50,000 Environmental Geology Series Armadale Part Sheets 2033 I & 2133 IV (Jordan 1986), indicates the site is comprised of:

- ‘clayey sand: silty in part, pale grey-brown, medium to coarse, poorly sorted, sub-angular to rounded, frequent heavy minerals, rare feldspar, of alluvial origin’

- ‘sand: white to pale grey at surface, yellow at depth, fine to medium-grained, moderately well sorted, subangular to subrounded quartz, of aeolian origin, over other units’.

A total of 148 geological test pits were completed across the site and wider MKSEA Precinct 3A area (Douglas Partners 2016). The results of site-specific geotechnical investigation have been used to develop a detailed hydrological model of the site and confirm the regional mapping, indicating that soils underlying the site are comprised of topsoil (sand and clayey sand) overlying sandy and gravelly materials, non-engineered fill, clayey sand and gravelly materials (Douglas Partners 2016).

3.3.2 Vegetation

Three flora and vegetation surveys incorporating the site have been previously undertaken, including:

- MKSEA Environmental Review: Flora, Vegetation, Fauna and Wetlands (Cardno BSD 2005)

- The Flora, Vegetation and Wetlands of MKSEA (Tauss and Weston 2010)

- Flora and Vegetation Assessment MKSEA Precinct 3A (Emerge Associates 2016)

Based on the findings of the above surveys, the site is historically cleared, with remaining vegetation dominated by introduced species. The vegetation within the site was assessed to be in ‘completely degraded’ condition and comprises a parkland cleared woodland and grassland, of predominantly non-native trees over pasture grasses as shown in Figure 8.

3.4 Describe any outstanding natural features and/or any other important or unique values relevant to the project area.

The site has been subject to significant historical disturbance and is in a highly modified completely degraded condition, with no outstanding natural features other than the planted predominately non-native trees that are used by FRTBC for roosting.

Bush Forever Site 387 (Greater Brixton Street Wetlands (GBSW)) is located 590 m south-east of the site as shown in Figure 1. The GBSW is a significant natural feature that supports high biodiversity values, including occurrences of threatened species and threatened ecological communities protected under Commonwealth and State environmental legislation. As the site is geographically separated from this natural feature no direct impact to the flora, fauna or vegetation within the GBSW would occur as a result of the proposed action.

The existing groundwater and surface water regimes applicable to the site are not connected to, and therefore do not have capacity to impact upon the GBSW. As such, the proposed action will not result in any direct hydrological impacts to the GBSW, nor can it result in any indirect impacts to the GBSW though influencing groundwater or surface water regimes.

Yule Brook is situated between the site and the GBSW, providing the catchment for surface water runoff from the site. The Yule Brook conveys flows west and is part of the Water Corporation drainage network. The adjacent areas of Yule Brook are currently in highly disturbed condition as a result of historical and existing land uses. However, it does support intermittent occurrences of conservation significant vegetation, including patches of the Muchea Limestone of the Swan Coastal Plain TEC (within the UFI 7635 feature shown in Figure 4). Any impacts to the Yule Brook and associated environmental values as a result of the proposed action will be avoided through the maintenance of the existing groundwater and surface water regimes including the maintenance of flow rates, volumes and water quality entering the Yule Brook from the site.

Water sensitive design principles that inform the proposed action will ensure that surface and groundwater that passes through the site and is conveyed by Yule Brook to the Canning River and Swan Canning Estuary system will not result in direct or indirect impacts due to changes in water volumes or quality.

3.5 Describe the status of native vegetation relevant to the project area.

The vegetation within the site was assessed to be in 'completely degraded' condition and comprises a parkland cleared woodland and grassland, of predominantly non-native trees over pasture grasses as shown in Figure 8 (Emerge Associates 2016).

3.6 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

The site is generally flat and low-lying, with elevation ranging from approximately nine m Australian height datum (AHD) in the south to 12 m AHD in the north (DoW 2008) as shown in Figure 7. This is based on high resolution LIDAR data.

3.7 Describe the current condition of the environment relevant to the project area.

The site occurs in a historically disturbed landscape, assessed as degraded, that is transitioning from rural residential land uses to commercial/ industrial land uses (Emerge Associates 2016). The wider local area comprises a mixture of urban residential, industrial and rural residential land uses along with conservation and parks and recreation.

3.8 Describe any Commonwealth Heritage Places or other places recognised as having heritage values relevant to the project area.

Not applicable. There are no Commonwealth or other heritage places identified within the site.

3.9 Describe any Indigenous heritage values relevant to the project area.

No Aboriginal heritage values are known or considered likely to occur within the site.

One ‘lodged’ Aboriginal heritage place (ID 4340) had been incorrectly mapped by the Department of Planning, Lands and Heritage (DPLH) as occurring within the site. A ‘lodged’ Aboriginal heritage place is defined by the DPLH as an ‘other heritage place’, meaning information has been received by DPLH in relation to the heritage place, but an assessment has not been completed to determine whether it meets the definition of a Registered Aboriginal Heritage Site under the Aboriginal Heritage Act 1972.

Lodged Aboriginal heritage place 4340 was originally identified in 1973 and was recorded to comprise a quartz artefact scatter, however the spatial accuracy of its mapped location is considered unreliable by the DPLH. The mapped location of the heritage place was reviewed by Horizon Heritage in January 2016, which included an assessment of the original 1973 sketch plan and associated description of its location, in addition to a site visit to verify this information. This review process determined that the Aboriginal heritage values associated with DAA 4340 are incorrectly mapped and actually occur outside of the site, within lot 414 Grove Road further to the south.

3.10 Describe the tenure of the action area (e.g. freehold, leasehold) relevant to the project area.

The land parcels comprising the site are held in freehold by the proponent.

3.11 Describe any existing or any proposed uses relevant to the project area.

A review of historic aerial photography indicates that the majority of the site was cleared of remnant vegetation prior to 1953 to support agricultural land uses. More recently, the site has been used for a combination of rural-residential, small-scale agricultural and light industrial (freight, warehousing and logistics) activities.

The proponent has taken ownership of all land parcels incorporating the site and all former tenants have vacated the applicable lots.

Section 4 - Measures to avoid or reduce impacts

Provide a description of measures that will be implemented to avoid, reduce, manage or offset any relevant impacts of the action. Include, if appropriate, any relevant reports or technical advice relating to the feasibility and effectiveness of the proposed measures.

Examples of relevant measures to avoid or reduce impacts may include the timing of works, avoidance of important habitat, specific design measures, or adoption of specific work practices.

4.1 Describe the measures you will undertake to avoid or reduce impact from your proposed action.

The proponent has developed an approach to primarily avoid and mitigate impacts associated with its development, and this is outlined in Conservation Strategy for MKSEA Precinct 3A document (Linc Property 2018). The Conservation Strategy for MKSEA Precinct 3A document is provided as Attachment D.

To avoid impacts to the roost within the site, accurate information was obtained to characterise and understand the roost structure and its use by FRTBCs. The roost area was accurately located by digitising aerial imagery of tree canopy within which FRTBCs had been observed roosting and then survey pick up of the trunk location of trees within the roost area. The roost area was further refined through sustained investigations and monitoring.

The layout and design of the development within the site was evaluated by the proponent and revised to minimise impacts to the roost area. The proposed development footprint or work area will extend over up to 6.8721 ha of the site, as a portion of the site will remain undisturbed within a drainage reserve as shown in Figure 3. Consequently, the majority of trees within the roost will be retained within a drainage basin in a reserve. The proposed action only requires that 27.7% of trees within the roost and 28.0 % of the roost by area is impacted (approximately 30%). The construction and subsequent operation of the drainage basin will not negatively impact to the river red gum trees or flooded gum trees within the roost, as river red gums are a riparian species that is well adapted to frequent, episodic inundation (ANBG 2018) and flooded gums occur on floodplains or stream banks (CSIRO 2018). Two experts in FRTBCs, Murdoch University and WA Museum have reviewed the proposed action and have agreed that the function of the roost within the site would be maintained. The revised drainage configuration developed to avoid impacting the function to the roost within the site is outlined in Figure 3.

In addition, the following measures will be implemented to avoid impacts to FRTBC individuals and other native fauna that may be present within the site at the time of clearing:

- Preparation and implementation of a Fauna Management Plan prior to any ground disturbing works which may impacts upon fauna species or associated habitat, including MNES such as FRTBC. This is primarily a construction management consideration and will be required

prior to the commencement of any subdivision ground disturbing works within the site.

- Ensuring that no clearing will be undertaken from dusk to dawn to avoid potential impacts to any FRTBC roosting within the site.

- Engaging a fauna specialist to inspect all the trees within the site to ensure that no FRTBC are present before any clearing occurs within the site. If any FRTBC are present, no clearing will occur until the FRTBC have moved from the site.

As outlined in the Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018), planting of new FRTBC foraging (and potential future roosting) habitat and other native plants is proposed within:

- the reconfigured drainage area of MKSEA precinct 3A subdivision area;

- a selection of completely degraded lots within Bush Forever Site 387 (Greater Brixton St Wetland), pending agreement with relevant State government authorities (see correspondence obtain from DBCA in this regard within Attachment E);

- swales and road verge areas within the MKSEA precinct 3A subdivision area; and

- Woodlupine Brook Reserve pending agreement with the City of Gosnells.

4.2 For matters protected by the EPBC Act that may be affected by the proposed action, describe the proposed environmental outcomes to be achieved.

The proposed action will marginally modify a known FRTBC roost. Notwithstanding this, the approach to the proposed action will maintain the ongoing function of the roost. This has been confirmed independently by expert opinions from WA Museum and Murdoch University (refer Attachment C).

The Conservation Strategy for MKSEA Precinct 3A prepared by the proponent proposes the revegetation of native vegetation within the site, within the broader MKSEA Precinct 3A area and within specific locations within the Greater Brixton Street Wetlands and Woodlupine Brook Reserve ((Linc Property 2018) provided as Attachment D). The native vegetation will include new foraging habitat and subsequently also potential roosting habitat. The additional foraging resources within the site, MKSEA Precinct 3A and Woodlupine Brook Reserve will start to provide benefits to local FRTBCs within an estimated timeframe of 10 to 20 years. The establishment of a revegetation area within the Greater Brixton Street Wetland will result in improved conservation outcomes for this important conservation area (see Attachment E).

Section 5 – Conclusion on the likelihood of significant impacts

A checkbox tick identifies each of the matters of National Environmental Significance you identified in section 2 of this application as likely to be a significant impact.

Review the matters you have identified below. If a matter ticked below has been incorrectly identified you will need to return to Section 2 to edit.

5.1.1 World Heritage Properties

No

5.1.2 National Heritage Places

No

5.1.3 Wetlands of International Importance (declared Ramsar Wetlands)

No

5.1.4 Listed threatened species or any threatened ecological community

No

5.1.5 Listed migratory species

No

5.1.6 Commonwealth marine environment

No

5.1.7 Protection of the environment from actions involving Commonwealth land

No

5.1.8 Great Barrier Reef Marine Park

No

5.1.9 A water resource, in relation to coal/gas/mining

No

5.1.10 Protection of the environment from nuclear actions

No

5.1.11 Protection of the environment from Commonwealth actions

No

5.1.12 Commonwealth Heritage places overseas

No

5.2 If no significant matters are identified, provide the key reasons why you think the proposed action is not likely to have a significant impact on a matter protected under the EPBC Act and therefore not a controlled action.

The site contains a night roost used by Calyptorhynchus banksii naso (forest red-tailed black cockatoo) which will be modified by the proposal but will retain its full functionality for roosting during and post development.

FRTBCs are listed as a 'vulnerable' threatened species under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). No other MNES are considered to have the potential to be impacted by the proposed action.

There will be no significant impacts to the roost or FRTBC as a result of the proposed action which has been assessed by two leading experts in FRTBC who also confirm the proposal will not impact on the function of the roost or the FRTBC population. Nonetheless, as a result of the public interest on the roost, it was deemed the proposed action should be referral to the DoEE (DoEE 2012, 2017b).

The Conservation Strategy for MKSEA Precinct 3A prepared by the proponent firstly avoids impacts to the roost and secondly provides mitigation through tree planting, best practice water management, ongoing monitoring and scientific research and conservation and protection through the establishment of an environmental covenant (as outlined in Attachment D).

5.2.1 Forest red-tailed cockatoo

The criteria in the significant impact guidelines refer to 'important populations' of FRTBC. A specific definition for this term is not available, due to the mobile and widely-dispersed nature of this species and the variation in flock compositions (for example, between breeding and non-breeding seasons). For FRTBC, it is considered more appropriate to consider the significance of an impact on habitat and individuals rather than a resident population (DoEE 2017c).

The impact assessment is provided below in Table 4 and adopts the significant impact criteria provided by Significant Impact Guidelines 1.1 – Matters of National Environmental Significance.

Table 5: Statement against significant impact criteria

Significant Impact Criteria

1. Lead to a long-term decrease in the size of an important population of a species

Likelihood: Nil

Comment:

- The proposed action will have no impact on the continuing use of the site for roosting by FRTBCs. Two leading experts on FRTBC activity, Murdoch University and WA Museum, have indicated that the minor modification to roost that is proposed and the associated Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018) will preserve the function of the roost and maintain sustainable foraging and roosting habit for FRTBCs in the future (refer Attachment C).

- The proposed action will not result in a direct impact to any FRTBC individuals. The proposed action is also unlikely to increase mortality rates indirectly through increasing future threats to FRTBCs (vehicle strikes, hunting etc.).

- The proposed action will not directly impact FRTBC breeding behaviour or breeding success due to the lack of potential habitat trees that contain hollows suitable for use by FRTBCs within the site. FRTBCs typically breed in October and November but will also breed in March and April if autumn rains are sufficient (TSSC 2009). Breeding activity is related to the abundance of foraging resource such as traditionally marri or jarrah seed (Johnstone et al. 2013).

- The proposed action will not impact on broader FRTBC roosting habitat. There are alternative roosts, with similar qualities and access to resources available nearby. As shown in Figure 6, the site is situated in the eastern portion of the Swan Coastal Plain, in proximity to many confirmed FRTBC roosting locations and an extensive range of potential roosting habitat. These confirmed and potential roosting locations are dispersed throughout the eastern Swan Coastal Plain, as well as throughout the adjacent Darling Plateau (the traditional range of the species). Notably, a confirmed alternative roost exists within 300 m of the site that has a history of use by FRTBCs.

- All the nearby confirmed and unconfirmed roosting locations are similarly proximal to extensive areas of potential FRTBC foraging habitat , as shown in Figure 6.

- The site occurs in a historically disturbed landscape that is transitioning from post agricultural, rural residential land uses to more light industrial land uses and contains limited foraging habitat value . The roost trees in the site have limited foraging value. The proposed action will therefore not result in a reduction of foraging habitat that could lead to a decrease in the size of an important population of a species.

- The Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc

Property 2018) outlines revegetation which will assist in mitigating the loss of any roosting habitat through the reestablishment of foraging habitat (and future roosting habitat) within the site, MKSEA Precinct 3A, the Greater Brixton St Wetlands and Woodlupine Brook Reserve (Linc Property 2018).

On this basis, the proposed action and associated retention of the function of the roost within the site, will not lead to a long-term decrease in FRTBC population.

2. Reduce the area of occupancy of an important population

Likelihood: Nil

Comment:

- The area of occupancy of the FRTBC is estimated at approximately 61,000 km2 (Crowley and Garnett 2001), of which the site represents only an extremely minor proportion. FRTBC numbers are increasing over the Swan Coastal Plain in response to foraging resources that occur in urban areas (Peck et al. 2017a). The increase in FRTBC represents a change from their typical range which is attributed to a slow vagrancy that is driven by opportunity for FRTBCs to exploit foraging resources such as *Melia azedarach (cape lilac) and marri (Johnstone et al. 2017).

- FRTBCs are traditionally sedentary and roost in proximity to foraging resources within the jarrah forest on the Darling Scarp and Darling Plateau (Johnstone et al. 2017). The movement of FRTBCs onto the Swan Coastal Plain is relatively new occurrence and therefore roosts, such as the roost within the site, are considered new (Johnstone et al. 2017).

- The proposed action will not impact on the continuing function of the roost within the site. Two experts on FRTBC activity, Murdoch University and WA Museum, have indicated that the retention of the majority of the roost proposed and the associated Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018) will preserve the function of the roost and maintain sustainable foraging and roosting habit for FRTBCs in the future (refer Attachment C).

- As shown in Figure 6, the site is situated in proximity to a large number of confirmed FRTBC roosting locations, dispersed throughout the eastern Swan Coastal Plain and adjacent Darling Scarp.

- All the nearby confirmed and unconfirmed roosting locations are in close proximity to large areas of potential FRTBC foraging habitat, as shown in Figure 6. The availability of adjacent foraging resources increases the suitability of a black cockatoo roosting location. A large proportion of this habitat is afforded some form of protection from future clearing, including Bush Forever sites, regional ‘parks and recreation’ reserves and lands managed by DBCA as

shown in Figure 6.

- Results of previous fauna surveys (360 Environmental 2012; Harewood 2015; Peck et al. 2017a) show that roosting activity within the site and is sporadic and varied across the wider MKSEA area and surrounds, indicating that no one particular location in the area can be identified as being favoured or relied upon for roosting in the longer term. This is supported by literature that FRTBC roost sites are transient and use of a roost is dependent on factors such as nearby foraging quality and quantity and weather conditions (DSEWPaC 2012; DoEE 2017a). This suggests that the resident population of FRTBC currently using the roosting location within the site is likely to fluctuate over time irrespective of the proposed action.

- The Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018) prepared by the proponent outlines revegetation which will mitigate the loss of roosting habitat through the reestablishment of foraging habitat (and future roosting habitat) within the site, MKSEA Precinct 3A, the Greater Brixton St Wetlands and Woodlupine Brook Reserve (Linc Property 2018). Furthermore, the Conservation Strategy for MKSEA Precinct 3A provides funding for ongoing monitoring and scientific research into FRTBCs by leading Western Australian institutions.

Given the above, the minor modification to the roost associated with the proposed action will not reduce the area of occupancy of the species.

3. Fragment an existing important population into two or more populations

Likelihood: Nil

Comment:

- FRTBC are a highly mobile species and known to routinely cover large distances that do not require continuous habitat coverage. The proposed action involves a minor modification to a roost but will not impact upon its function. Two experts on FRTBC activity, Murdoch University and WA Museum, have indicated that retention of the majority of the roost proposed and the Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018) will preserve the function of the roost and maintain sustainable foraging and roosting habit for FRTBCs in the future (refer Attachment C). The extent of habitat loss within the site would therefore not fragment habitat or the distance between two or more areas of habitat to the extent that it would represent a barrier to movement across the landscape.

- As shown in Figure 6, the site is situated in proximity to a large number of confirmed FRTBC roosting locations, dispersed throughout the eastern Swan Coastal Plain and adjacent Darling Scarp. All the nearby confirmed roosting locations are located in similar close proximity to large areas of potential FRTBC foraging habitat, as shown in Figure 6.

Based on the above, the proposed action will not result in the fragmentation of an existing important population into two or more populations.

4. Adversely affect habitat critical to the survival of a species

Likelihood: Nil

Comment: • The proposed action will likely have no impact on the continuing function of the roost within the site. Two experts on FRTBC activity, Murdoch University and WA Museum, have indicated that the retention of the majority of the roost proposed and the associated Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018), will preserve the function of the roost and maintain sustainable foraging and roosting habit for FRTBCs in the future (refer Attachment C).

• Critical habitat for the survival for the FRTBC can be summarised as comprising all marri, karri and jarrah forests, woodlands and remnants in the south-west of Western Australia receiving more than 600 mm of annual average rainfall, including occurrences of marri-jarrah forest on the eastern portions of the Swan Coastal Plain (DEC 2007). FRTBC are a highly mobile species and known to routinely cover large distances that do not require continuous habitat coverage.

• As shown in Figure 6, the site is situated in the eastern portion of the Swan Coastal Plain, in proximity to many confirmed FRTBC roosting locations and an extensive range of potential roosting habitat. These confirmed and potential roosting locations are dispersed throughout the eastern Swan Coastal Plain, as well as throughout the adjacent Darling Plateau (the traditional range of the species). Notably a confirmed alternative roost exists within 500 m of the site that has a longer history of use by FRTBCs (360 Environmental 2012; Peck et al. 2017a). The roost within the site is not critical to the survival of FRTBC species.

• The Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018) outlines revegetation which will mitigate the loss of roosting habitat through the reestablishment of foraging habitat (and future roosting habitat) within the site, MKSEA Precinct 3A, the Greater Brixton St Wetlands and Woodlupine Brook Reserve (refer Attachment D).

On this basis, the proposed action will not impact upon habitat critical to the survival of the FRTBC species.

5. Disrupt the breeding cycle of an important population

Likelihood: Nil

Comment:

- Traditionally FRTBCs are sedentary and have bred in trees with suitable hollows that are in close proximity to foraging resources within the jarrah forest on the Darling Scarp and Darling Plateau (Johnstone et al. 2017). The movement of FRTBCs onto the Swan Coastal Plain is relatively new occurrence and therefore breeding sites are uncommon on the Swan Coastal Plain (Johnstone et al. 2017) .

- Impacting a roost does not represent a direct impact to any FRTBC individuals, nor does it directly impact breeding behaviour or breeding success.

- No potential habitat trees with hollows suitable for use by FRTBCs occur in the site.

- One potential FRTBC breeding location has recently been recorded within the wider local area (approximately 2km from the site) as shown in Figure 6. The proposed action will have no impact on this breeding location.

- The proposed action will not impact on the continuing function of the roost within the site. Two experts on FRTBC activity, Murdoch University and WA Museum, have indicated that the retention of the majority of the roost proposed and associated Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018) will preserve the function of the roost and maintain sustainable foraging and roosting habit for FRTBCs in the future (refer Attachment C)

Based on the above, the proposed action will not disrupt the breeding cycle of a population of FRTBC.

6. Modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline

Likelihood: Nil

Comment:

- The proposed action involves the minor modification of roosting habitat, but will not impact on the continuing function of the roost for FRTBCs within the site. Two experts on FRTBC activity, Murdoch University and WA Museum, have indicated that the retention of the majority of the roost proposed and associated Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018) will preserve the function of the roost and maintain sustainable foraging and roosting habit for FRTBCs in the future (refer Attachment C).

- Impacting a roost does not represent a direct impact to any FRTBC individuals, nor does it directly impact breeding behaviour or breeding success.

- Alternative confirmed and potential roosting locations are available throughout the nearby wider local area and the eastern Swan Coastal Plain and adjacent Darling Plateau (the traditional range of the species). Notably a confirmed alternative roost exists within 500 m of the site that has a longer history of use by FRTBCs (360 Environmental 2012; Peck et al. 2017a).

- All the nearby confirmed roosting locations are located in similar close proximity to large areas of potential FRTBC foraging habitat, as shown in Figure 6.

- The site occurs in a historically disturbed landscape that is transitioning from post agricultural, rural residential land uses to industrial land uses and contains limited foraging habitat value . The proposed action will therefore not result in a reduction of foraging habitat that could lead to a reduction of quality foraging resources.

- The Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018) outlines revegetation which will mitigate the loss of roosting habitat through the reestablishment of foraging habitat (and future roosting habita t) within the site, MKSEA Precinct 3A, the Greater Brixton St Wetlands and Woodlupine Brook Reserve (refer to Attachment D).

On this basis, the proposed action and associated minor modification of the roost within the site will not modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that FRTBCs are likely to decline.

7. Result in invasive species that are harmful to a vulnerable species becoming established in the vulnerable species' habitat

Likelihood: Nil

Comment:

- The introduction of species that are known to compete with black cockatoos for nesting hollows will not occur as a result of the proposed action.

- The proposed action is located in an area that is already highly modified with a variety of historical and existing land uses.

- Species that are known to compete with black cockatoos for nesting hollows include the native and introduced corellas (Cacatua species), galahs (Cacatua roseicapilla), Australian shelducks (Tadorna tadornoides), Australian wood ducks (Chenonetta jubata) and feral European honey bees (Apis mellifera) (Johnstone et al. 2013). A number of these species are recorded within the area surrounding the site during the recent fauna assessments, as well as confirmed by the NatureMap search results undertaken as part of previous fauna surveys (Cardno BSD 2005; Harewood 2015).

The proposed action will not result in invasive species that are harmful to FRTBCs species becoming established in the site or wider local area.

8. Introduce disease that may cause the species to decline

Likelihood: Nil

Comment:

- FRTBCs are potentially susceptible to diseases such as beak and feather disease virus (BFDV), avian polyomavirus (APV) and chlamydophilosis. Phytophthora cinnamomi (dieback), other soil-borne, foliar and canker pathogens, and insects can affect the health of FRTBC habitat.

- The proposed action will not be responsible for the introduction of these diseases or increase the susceptibility of birds.

- The site is already highly modified with a variety of historical land uses, including rural residential, agriculture and light industrial (freight, warehousing and logistics) that have higher potential to result in the introduction of avian disease or soil borne plant pathogens. Construction management practices will ensure the implementation of measures to avoid the introduction of soil borne pathogens that could impact surrounding habitat.

Based on the above, the proposed action will not lead to introduction of any disease/s that may cause the FRTBC to decline.

9. Interfere substantially with the recovery of the species.

Likelihood: Nil

Comment:

- The recovery objective for FRTBC is “to stop further decline in the breeding populations of the Forest Red-tailed Black Cockatoo and to ensure their persistence throughout their current range in the south-west of Western Australia for the duration of this plan” (DEC 2007). The key threats to the FRTBC have been identified as being nest hollow shortage, clearing and degradation, and illegal shooting (DEC 2007).

- The site does not contain significant foraging or breeding habitat. As discussed

previously the proposed action will preserve the function of the roost. Two experts on FRTBC activity, Murdoch University and WA Museum, have indicated that the retention of the majority of the roost proposed and the associated Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018) will preserve the function of the roost and maintain sustainable foraging and roosting habit for FRTBCs in the future (refer Attachment C)

- As shown in Figure 6, there is a large amount of available confirmed and potential roosting habitat for FRTBC in the wider local area.

- The Conservation Strategy for MKSEA Precinct 3A prepared by the proponent (Linc Property 2018) outlines revegetation which will mitigate the loss of roosting habitat through the reestablishment of foraging habitat (and future roosting habitat) within the site, MKSEA Precinct 3A, the Greater Brixton St Wetland and Woodlupine Brook Reserve (refer Attachment D). The Conservation Strategy for MKSEA Precinct 3A provides mitigation by proposing to plant 1160 trees within the site, a (to be determined) number of trees across Precinct 3A, 9,000 native plants in a nearby conservation reserve managed by the State government and 540 trees within nearby Woodlupine Conservation Reserve managed by the CoG.

In consideration of these factors, the modification of roosting habitat through the proposed action will not interfere with the recovery of the species.

Section 6 – Environmental record of the person proposing to take the action

Provide details of any proceedings under Commonwealth, State or Territory law against the person proposing to take the action that pertain to the protection of the environment or the conservation and sustainable use of natural resources.

6.1 Does the person taking the action have a satisfactory record of responsible environmental management? Please explain in further detail.

MKSEA Pty Ltd is the entity responsible for the proposed development of the site and is affiliated with Linc Property, an Australian property development company with extensive experience in land development. In undertaking its projects, Linc Property has an exceptional record of responsible environmental management.

6.2 Provide details of any past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against either (a) the person proposing to take the action or, (b) if a permit has been applied for in relation to the action – the person making the application.

Not applicable.

6.3 If it is a corporation undertaking the action will the action be taken in accordance with the corporation's environmental policy and framework?

Yes

6.3.1 If the person taking the action is a corporation, please provide details of the corporation's environmental policy and planning framework.

The proponent it is committed to delivering best practice environmental outcomes and has developed a conservation strategy specific to this project Reserve (refer Attachment D).

6.4 Has the person taking the action previously referred an action under the EPBC Act, or been responsible for undertaking an action referred under the EPBC Act?

Yes

6.4.1 EPBC Act No and/or Name of Proposal.

2012/6501 Wangara Industrial Expansion Area.

Section 7 – Information sources

You are required to provide the references used in preparing the referral including the reliability of the source.

7.1 List references used in preparing the referral (please provide the reference source reliability and any uncertainties of source).

Reference Source	Reliability	Uncertainties
• ANBG 2018 Eucalyptus camaldulensis, accessed 18 May 2018 from http://www.anbg.gov.au/cpbr/WfHC/Eucalyptus-camaldulensis/. • CSIRO 2018 Euclid Eucalyts of Australia, accessed 6 June 2018 from http://keyserver.lucidcentral.org:8080/euclid/data/02050e02-0108-490e-8900-0e0601070d00/media/Html/index.htm • 360 Environmental 2012, Black Cockatoo Survey – Maddington Kenwick Strategic Employment Area. • Bamford Consulting Ecologists 2017, Black-cockatoo values of the Maddington Kenwick Strategic Employment Area (MKSEA) Precinct 3A Referral Area (Kenwick/Wattle Grove), V2. • Cardno BSD 2005, Maddington-Kenwick Strategic Industrial Area - Environmental Review: Flora, Vegetation, Fauna and Wetlands. • Crowley, G. M. and Garnett, S. T. 2001, Food Value and tree selection by Glossy Black-Cockatoos Calyptorhynchus lathami, Austral Ecology, 26: 116-126. • Department of Agriculture and Food (DAFWA) 2016, Current Extent of Native Vegetation - Western Australia (October	High for all	None for all

Reference Source	Reliability	Uncertainties
2016), Perth. • Department of Environment and Conservation (DEC) 2007, Forest Black Cockatoo (Baudin's Cockatoo - Calyptorhynchus baudinii) and Forest Red-tailed Black Cockatoo (Calyptorhynchus banksii naso) Recovery Plan, Perth. • Department of the Environment and Energy (DoEE) 2012, EPBC Act referral guidelines for three threatened black cockatoo species, Australian Government, Canberra. • Department of the Environment and Energy (DoEE) 2017a, 'Revised draft referral guideline for three threatened black cockatoo species: Carnaby's Cockatoo, Baudin's Cockatoo and the Forest Red-tailed Black Cockatoo, Commonwealth of Australia. • Department of Environment and Energy (DoEE) 2017b, Revised draft Revised draft referral guideline for three threatened black cockatoo species: Carnaby's Cockatoo (Endangered) Calyptorhynchus latirostris, Baudin's Cockatoo (Vulnerable) Calyptorhynchus baudinii and Forest Red-tailed Black Cockatoo (Vulnerable) Calyptorhynchus banksii naso, Canberra, Australia. • Department of Environment and Energy (DoEE) 2017c, Revised draft Revised draft referral guideline for three threatened black cockatoo species: Carnaby's Cockatoo (Endangered) Calyptorhynchus latirostris, Baudin's Cockatoo (Vulnerable) Calyptorhynchus		

Reference Source	Reliability	Uncertainties
baudinii and Forest Red-tailed Black Cockatoo (Vulnerable) Calyptorhynchus banksii naso, Canberra, Australia. • Douglas Partners 2016, Factual Report on Geotechnical Investigations - Proposed Industrial Subdivision Coldwell Road, Kenwick, 88698.07. • Department of Water (DoW) 2008, LiDAR Elevation Dataset, Swan Coastal Plain, Perth. • Department of Sustainability Environment Water Populations and Communities (DSEWPaC) 2012, EPBC Act referral guidelines for three threatened black cockatoo species: Carnaby's cockatoo (endangered) Calyptorhynchus latirostris, Baudin's cockatoo (vulnerable) Calyptorhynchus baudinii and Forest red-tailed black cockatoo (vulnerable) Calyptorhynchus banksii naso, Commonwealth of Australia, Canberra. • Emerge Associates 2016, Flora and Vegetation Assessment Maddington Kenwick Strategic Employment Area Precinct 3a. • Emerge Associates 2017, Local Water Management Strategy MKSEA Precinct 3A Outline Development Plan. • Harewood, G. 2015, Fauna Assessment - Maddington Kenwick Strategic Employment Area Precinct 3. • Harewood, G. 2016, Fauna Assessment Maddington Kenwick Strategic Employment Area Precinct 3. • Johnstone, R. E., Kirkby, T. and Sarti, K. 2013, The breeding biology of the forest red-tailed black cockatoo		

Reference Source	Reliability	Uncertainties
Calyptorhynchus banksii naso Gould in south-western Australia. II Breeding behaviour and diet, Pacific Conservation Biology, 19(2): 143-155. • Johnstone, R. E., Kirkby, T. and Sarti, K. 2017, The distribution, status movements and diet of the forest red-tailed black cockatoo in the south-west with emphasis on the greater Perth region, Western Australia, The West Australian Naturalist, 30(4): 193-219. • Jordan, J. E. 1986, Armadale Part Sheets 2033 I and 2133 IV, Geological Survey of Western Australia, Department on Minerals and Energy, Perth. • Linc Property 2018, Conservation Strategy for MKSEA Precinct 3A. • McPherson, A. and Jones, A. (Geoscience Australia), 2005, Natural Hazard Risk in Perth, Western Australia. Appendix D: Perth Basin Geology Review and Site Class Assessment, Geoscience Australia, Perth. • Peck, A., Barret, G. and Williams, M. 2017a, The 2017 Great Cocky Count: a community-based survey for Carnaby's Black-Cockatoo (Calyptorhynchus latirostris), Baudin's Black-Cockatoo (Calyptorhynchus baudinii) and Forest Red-tailed Black-Cockatoo (Calyptorhynchus banksii naso). BirdLife Australia, Floreat, Western Australia. • Tauss, C. and Weston, A. S. 2010, The flora, vegetation and wetlands of the Maddington-Kenwick Strategic Emplyment Area. • Threatened Species Scientific Committee		

Reference Source	Reliability	Uncertainties
(TSSC) 2009, Advice to the Minister for the Environment, Heritage and the Arts from the Threatened Species Scientific Committee (the Committee) on Amendment to the list of Threatened Species under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) - Calyptorhynchus banksii naso (Forest Red-tailed Black Cockatoo), Canberra. • Western Australian Planning Commission (WAPC) 2012, Economic and Employment Lands Strategy: non-heavy industrial, Perth, WA. • Western Australian Planning Commission (WAPC) 2015a, Draft North-East Sub-regional Planning Framework, Perth. • Western Australian Planning Commission (WAPC) 2015b, Draft Perth and Peel@3.5 Million, Perth.		

Section 8 – Proposed alternatives

You are required to complete this section if you have any feasible alternatives to taking the proposed action (including not taking the action) that were considered but not proposed.

8.0 Provide a description of the feasible alternative?

N/A

8.1 Select the relevant alternatives related to your proposed action.

8.27 Do you have another alternative?

No

Section 9 – Contacts, signatures and declarations

Where applicable, you must provide the contact details of each of the following entities: Person Proposing the Action; Proposed Designated Proponent and; Person Preparing the Referral. You will also be required to provide signed declarations from each of the identified entities.

9.0 Is the person proposing to take the action an Organisation or an Individual?

Organisation

9.2 Organisation

9.2.1 Job Title

Director

9.2.2 First Name

Ben

9.2.3 Last Name

Lisle

9.2.4 E-mail

ben@lincproperty.com.au

9.2.5 Postal Address

PO Box 782
Subiaco WA 6904
Australia

9.2.6 ABN/ACN

ABN

33096272043 - LINC PROPERTY PTY LTD

9.2.7 Organisation Telephone

08 9381 8301

9.2.8 Organisation E-mail

admin@lincproperty.com.au

9.2.9 I qualify for exemption from fees under section 520(4C)(e)(v) of the EPBC Act because I am:

Not applicable

Small Business Declaration

I have read the Department of the Environment and Energy's guidance in the online form concerning the definition of a small a business entity and confirm that I qualify for a small business exemption.

Signature:…… Date: ……

9.2.9.2 I would like to apply for a waiver of full or partial fees under Schedule 1, 5.21A of the EPBC Regulations

No

9.2.9.3 Under sub regulation 5.21A(5), you must include information about the applicant (if not you) the grounds on which the waiver is sought and the reasons why it should be made

Person proposing the action - Declaration

I, _____BEN LISLE_____ declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf of or for the benefit of any other person or entity.

Signature:.. …… Date: ……12/07/18……

I, _____BEN LISLE_____, the person proposing the action, consent to the designation of _____LINC PROPERTY PTY LTD_____ as the proponent of the purposes of the action describe in this EPBC Act Referral.

Signature:.. …… Date: ……12/07/18……

9.3 Is the Proposed Designated Proponent an Organisation or Individual?

Organisation

9.5 Organisation

9.5.1 Job Title

Director

9.5.2 First Name

Ben

9.5.3 Last Name

Lisle

9.5.4 E-mail

admin@lincproperty.com.au

9.5.5 Postal Address

PO Box 782
Subiaco WA 6904
Australia

9.5.6 ABN/ACN
ABN

33096272043 - LINC PROPERTY PTY LTD

9.5.7 Organisation Telephone

08 9381 8301

9.5.8 Organisation E-mail

admin@lincproperty.com.au

Proposed designated proponent - Declaration

I, _____LINC PROPERTY PTY LTD_____, the proposed designated proponent, consent to the designation of myself as the proponent for the purposes of the action described in this EPBC Act Referral.

Signature:.  ……. Date: …12/07/18……

9.6 Is the Referring Party an Organisation or Individual?

Organisation

9.8 Organisation

9.8.1 Job Title

Director, Principal Environmental Consultant

9.8.2 First Name

Jason

9.8.3 Last Name

Hick

9.8.4 E-mail

Jason.Hick@emergeassociates.com.au

9.8.5 Postal Address

4/26 Railway Road
Subiaco WA 6008
Australia

9.8.6 ABN/ACN

ABN

57144772510 - Emerge Environmental Services Pty Ltd

9.8.7 Organisation Telephone

08 9380 4988

9.8.8 Organisation E-mail

admin@emergeassociates.com.au

Referring Party - Declaration

I, JASON HICK, I declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence.

Signature: ..... Date: 12/07/2018

Appendix A - Attachments

The following attachments have been supplied with this EPBC Act Referral:

1. 2018.06.08_epbc_act_referral.zip
2. attachment_a_figures.pdf
3. attachment_b_mnes.pdf
4. attachment_c_expert_correspondence.pdf
5. attachment_d_conservation_strategy_for_mksea_precinct_3a.pdf
6. attachment_e_dbca_correspondence.pdf
7. bamford_consulting_ecologists_2017.pdf
8. emerge_associates_2016_-_part_1_of_2.pdf
9. emerge_associates_2016_-_part_2_of_2.pdf
10. harewood_2016.pdf