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Dear Daniell & Hayley,

RE: (SW709) Wadandi Track Alignment, Carbunup River, Marybrook to Flinder's Bay, Augusta: Clearing Permit application

The City of Busselton (CoB) and Shire of Augusta Margaret River (SoAMR) propose to construct the Wadandi Track between Carbunup River, Marybrook, to Flinder's Bay, Augusta, within their respective local government areas. To accommodate the works, some portions of the track require clearing of native vegetation; approximately 0.78 ha (over 1.95 km) within the CoB and approximately 1.50 ha (over 3.76 km) within the SoAMR.

This cover letter has been prepared to provide background and supporting information for a Clearing (Purpose) Permit application, required under *section 51E* of the *Environmental Protection Act 1986* (draft attached). A preliminary assessment against the clearing principles indicates that the project may be at variance to clearing principle (f) Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland (0.86 ha). The project is not at or not likely to be at variance to any of the remaining 10 clearing principles. Offsets are not proposed as it is believed that the mitigation proposed will adequately reduce the residual impacts to an acceptable level.

If you have any enquiries regarding this letter, please contact me on 0437 700 917.

Yours sincerely,
Shane Priddle

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ATTACHMENTS
Attachment 1 Proposal background and assessment against the 10 Clearing Principles
Attachment 2 Proposed clearing application areas
Attachment 3a Design, Construction and Maintenance Specification (Common Ground, 2026)
Attachment 3b Construction Environmental Management Plan (CoB SoAMR, 2026)
Attachment 3c Phytophthora Dieback Management Plan (Bark Environmental, 2026)
Attachment 4 Draft Clearing (Purpose) Permit Application

ATTACHMENT 1 BACKGROUND

Proposal Background

The Wadandi Track in the Margaret River Region is currently 46 km long, spanning across two separate sections. Once complete, it will form a continuous 109 km route from the Busselton Jetty to Flinders Bay in Augusta, making it one of the longest rail trails in Australia. The project has the potential to become one of the nation's most iconic rail trail experiences.

The Department of Transport and Major Infrastructure is working with the City of Busselton (CoB) and Shire of Augusta Margaret River (SoAMR) to complete the track. The project will include new and refurbished bridges, smaller water crossings, new track, fencing, and wayfinding, and interpretation (the Project).

The CoB and the SoAMR jointly propose to construct portions of the Wadandi Track in the 2026/2027 FY, between Carbunup River, Marybrook and Flinders Bay, Augusta (totalling approximately 5.70 km in length). Some clearing is required, abutting Vasse-Yallingup Siding Road between Anniebrook and Yallingup Siding (CoB) and between Karridale and Augusta (SoAMR) (Attachment 2). The Project will be delivered as a series of staged design and construct packages over approximately four years, as detailed in the attached Design, Construction and Maintenance Specification (Common Ground, 2026) (Attachment 3a).

Project Description

The proposed track is co-located along the former railway line formation within the associated rail reserve. The rail reserve is under the care and management of respective LGs. The existing rail formation is approximately 4 m wide, including cut or fill batters at some locations that are of ~2 m width and are heavily compacted and modified, relative to adjacent rail reserve. As the railway was decommissioned up to ~80 years ago, some areas have started to develop regrowth. Much of the alignment remains heavily disturbed.

Some sections will require clearing of regrowth vegetation and/or pruning of encroaching vegetation to establish a safe and accessible track. Very minor localised deviations may cross remnant vegetation. In many areas, the track has already been constructed or utilised, as walking track, firebreaks, existing roads and/or hardstands. Additionally, significant sections pass through grassland or pasture without native vegetation. These sections have been excluded from the Clearing Permit application.

To accommodate the proposed works, up to 2.28 ha of native vegetation will need to be cleared (herein referred to as the 'application areas'). This includes ~0.78 ha (over 1.95 km in two sections) within the CoB and ~1.50 ha (over 3.76 km in eight sections) within the SoAMR. The Project location and application areas are provided in Figures 1 and 2 (Attachment 2). In most locations, the track will be less than 2.5 wide, potentially less, to avoid constraints. Clearing of up to 3.5 - 4 m width and 2.4 m height may be required, however, for batters and machinery access at some locations. The Design, Construction and Maintenance Specification (Common Ground, 2026) (Attachment 3a) provides typical cross sections and other details such as:

- Trail surfaces
- New trail construction
- Upgrades to existing roads, trails, and paths
- Works required to deliver a stable, compacted, all-weather surface meeting:
    - Australian Walking Track Grading System (AWTS) – Grade 2
    - WA MTB Guidelines / International Mountain Bicycle Association (IMBA) Trail Difficult Rating System – Green Circle (Easy)
- Trailheads
- Signage – regulatory and warning

- Fencing and gates
- Road and driveway crossings
- Drainage structures
- Bridges and boardwalks

As the works require clearing of native vegetation, LGs will jointly submit a Clearing (Purpose) Permit Application under section 51E of the *Environmental Protection Act 1986,* administered by the WA Department of Water and Environmental Regulation (DWER).

The LGs have considered various measures to avoid, minimise, mitigate and manage the potential impact of proposed clearing, as detailed below. Recent flora, fauna and vegetation surveys have been conducted, providing baseline information to support the project design and application. These include:

- *Biodiversity Surveys (Flora, Fauna and Vegetation), Wadandi Track Alignment, Carbunup River, Marybrook, to Gardiner Road, Cowaramup* (SW Environmental, 2026).
- *Targeted Survey and Updated Flora and Fauna Assessment. Wadandi Trail, from Sebbes Road to Flinders Bay* (Ecosystem Solutions, 2025).

These reports cover a significantly larger Survey Area (additional sections and the full rail reserve), and a superseded route alignment which has been updated to avoid constraints, minimising vegetation clearing. Further, some sections have yet to be finalised due to design considerations, potential constraints and further investigations, including the need for follow-up spring surveys (excluded from the current application area). The main findings of the reports are summarised below.

A further preliminary assessment of the residual impacts of clearing is also provided against the 10 clearing principles. This is based on the current route alignment, proposed impacts, findings of biodiversity surveys and other desktop sources.

Summary of the results of the Biodiversity Surveys

Biodiversity survey results within each LG are summarised below for context. **Note that the area under application is only a small portion of each respective Survey Area** and has been assessed in preliminary assessment against the 10 clearing principles.

CoB (SW Environmental, 2026)

SW Environmental undertook a Reconnaissance and Targeted Flora and Vegetation Survey, and a Basic and Targeted Fauna Assessment, aligned with relevant Environmental Protection Authority (EPA) guidance. The 17.82 km-long Survey Area included a track alignment to nominal width of 8 m. Adjacent vegetation was surveyed along the full 29.63 km rail reserve.

Vegetation along the rail formation had been historically cleared and comprised a mosaic of conditions, including cleared areas, weed-dominated vegetation, non-local plantings and patches of native regrowth, particularly within wetter sections. More intact native vegetation occurred adjacent to the rail formation.

The Survey Area intersected both the Perth (SWA02) and Southern Jarrah Forest (JAF02) IBRA subregions. The desktop study identified 53 conservation significant flora taxa recorded within a 5 km desktop survey area, including 10 conservation significant vegetation communities. The Cowaramup (Cw2), Yelverton (Yw), Abba and Southern River vegetation complexes mapped within the Survey Area were all below the national biodiversity conservation objective, with less than 30% of their pre-European extent remaining. The Cowaramup (C2 and Cw2), Metricup (M), Treeton (Tw), Yelverton (Y, Yd and Yw), Abba and Southern River complexes meet the criteria for Locally Significant Natural Areas.

Eight vegetation units were mapped:

- Jarrah-Marri open forest associated with upland positions and elevated sandy soils;

- Banksia woodland and Kunzea scrub vegetation associated with elevated sandy soils, including degraded and transitional forms;
- Seasonally wet Eucalyptus rudis and peppermint woodland on sandy flats;
- Marri forest and moisture-influenced vegetation associated with lower slopes and seasonally damp flats;
- Eucalyptus patens creekline forest and associated drainage line vegetation;
- Seasonally wet Kunzea and Nuytsia shrublands with sedgeland communities;
- Melaleuca dampland forest; and
- Claypan vegetation associated with seasonally waterlogged soils and drainage systems.

Vegetation condition ranged from Excellent to Completely Degraded, with higher-quality vegetation associated with drainage lines and remnant edges, and more degraded vegetation occurring along the historical rail formation. Cleared areas and infrastructure also occur.

No Threatened flora species were recorded within the Survey Area. Eight Priority flora taxa were recorded within the Survey Area - *Acacia flagelliformis* (Priority 4), *Acacia semitrullata* (Priority 4), *Dillwynia* sp. Capel (P.A. Jurjevich 1771) (Priority 3), *Gahnia sclerioides* (Priority 4), *Jacksonia gracillima* (Priority 3), *Johnsonia inconspicua* (Priority 3), *Loricobbia pinifolia* (Priority 3), and *Netrostylis sp*. Blackwood River (A.R. Annels 3043) (Priority 3). An additional Priority taxon, *Cyathochaeta teretifolia* (Priority 3), is considered likely to occur within areas of suitable habitat along the Survey Area. An additional species of significance, *Synaphea* aff. *obtusata,* is known from the Darling Scarp and South Coast. This collection represents the first record west of these landforms. Pending taxonomic confirmation, the taxon should be treated as a potential new species of conservation significance.

Weeds were present throughout the Survey Area, with highest densities associated with localised disturbance along the rail reserve, such as historical infrastructure, gravel extraction and dumping.

A known occurrence of the Seasonal rainfall-filled wetlands with an impeding substrate of the Swan Coastal Plain and Jarrah Forest in transitional rainfall zones ecological community (Critically Endangered under the EPBC Act; Priority 1 PEC) was confirmed within the Survey Area, corresponding with the Claypan TEC. Mapped occurrences of the Banksia Woodlands of the Swan Coastal Plain ecological community (Endangered under the EPBC Act; Priority 3 PEC) also intersect the Survey Area; however, vegetation within the Survey Area did not meet diagnostic criteria. The VU4 – Marri Forest vegetation unit likely represents the *Corymbia calophylla* woodlands on heavy soils of the southern Swan Coastal Plain (floristic community type 1b as originally described in Gibson et al. (1994)), listed as Critically Endangered under the BC Act. Vegetation associated with drainage lines exhibited characteristics consistent with Whicher Scarp G2 and/or Swan Coastal Plain Paluslope Wetlands ecological communities (both Priority 1 PECs). While not formally classified as a PEC, these areas were considered to represent high ecological value within the Survey Area.

The desktop study identified 257 terrestrial (or semi-aquatic) vertebrate fauna taxa that may have occurred within the DSA. Under the BC Act, this included 17 Threatened taxa, eight Priority-listed species, one Conservation Dependent taxon, one Other Specially Protected taxon, and 16 Migratory bird species. Additionally, two fish and ten invertebrates of conservation significance were returned. Forty-three fauna taxa were detected during surveys, including two Threatened species and one Priority 4-listed. Numerous other fauna species may have utilised the Survey Area as part of a broader habitat network.

Habitat quality varied significantly within vegetation types and the proposed track formation exhibited much lower fauna habitat quality than adjacent areas. Areas of good-quality habitat were generally small and patchy, associated with relatively intact vegetation, particularly within drainage lines and creeklines where vegetation structure, canopy connectivity and understorey complexity had been retained, or where long-term native regrowth had re-established these values. These areas provided suitable habitat for a range of fauna species and contributed to habitat connectivity between vegetation on either side of the track.

No hollow-bearing trees, black cockatoo[1] breeding trees or roosts were recorded within the 8 m wide track area. Sixty-three trees were of a suitable DBH for developing black cockatoo breeding hollows (>50 cm).

Baudin's Cockatoo and FRTBC foraging residue were recorded. No evidence of Carnaby's Cockatoo was recorded, although the species may utilise the site. Approximately 45.24 ha of native vegetation was classified as high-quality black cockatoo foraging habitat (maximum score). Foraging scores along the track alignment were considered lower due to the alignment representing only a small, disturbed portion of the broader reserve and comprising young regrowth, sparse canopy cover or low densities of feed species.

Eighteen Western Ringtail Possums (WRP) and four Common Brushtail Possums (CBP) were recorded within the rail reserve during the 2025/26 Survey Area surveys. An additional 11 WRP and three CBP were recorded within the rail reserve between the 2025/26 survey patches, which were proposed to be the subject of future surveys. Most WRP records occurred within the Swan Coastal Plain IBRA, areas of intact midstorey or contiguous vegetation in the southern Jarrah Forest IBRA, or areas located within 500 m of drainage lines. WRP abundance was considered likely to decrease significantly southwards. In most areas, the partially disturbed and narrow linear nature of the corridor suggested that the area functioned primarily as supporting habitat and a movement corridor, rather than core habitat within the track alignment itself.

Other conservation significant fauna taxa, including Quenda (detected), Carter's Freshwater Mussel, Dunsborough Burrowing Crayfish, South-western Brush-tailed Phascogale, Rakali and Peregrine Falcon, may have occurred within the Survey Area. Species may be transient or associate the track with movement through the landscape, rather than long-term occupation. This would be due to the narrow, linear extent of the Survey Area.

Overall, the proposed works involved a linear disturbance footprint within a broader vegetated landscape. Works were considered unlikely to result in significant impacts to flora, vegetation or fauna values, subject to implementation of the recommended avoidance and management measures.

SoAMR (Ecosystem Solutions, 2025)

Ecosystem Solutions undertook a Targeted Survey and Updated Flora and Fauna Assessment over a ~32 km section of the Wadandi track, from Sebbes Road to Flinders Bay within the Shire of Augusta-Margaret River. The track was surveyed over two years; spring of 2023 and spring of 2024, complying with basic and targeted surveys as per EPA (2016) Technical Guidance for Flora and Vegetation and Terrestrial Vertebrate Fauna (EPA, 2020).

The track was classified into four categories based on the condition of the track and likely impact to vegetation:

- Wide– minimal clearing/pruning and track maintenance expected, 10.1 km,
- Minor regrowth – area previously cleared with minor regrowth occurring, 1.5 km,
- Narrow - walking track evident however widening is required, 9.6 km, and
- Fully vegetated – clearing is required, 11.4 km.

Caladenia lodgeana (Lodge's Spider-orchid, Critically Endangered under the EPBC Act (Cth)) is known to occur within the Site (DBCA, 2024a). A targeted survey was conducted to document any flowering plants within the known population, as well as other areas of suitable habitat. This would ensure that clearing does

[1] Black cockatoos collectively refer to

- Forest Red-tailed Black-Cockatoo (*Calyptorhynchus banksii subsp. naso*) (Vulnerable)
- Baudin's Black-Cockatoo (*Zanda baudinii*) (Endangered)
- Carnaby's Black-Cockatoo (*Zanda latirostris*) (Endangered)

not impact the species. No *C. lodgeana* were observed in the known species location, with during the flowering period of *C. lodgeana*. Caladenia species are known to not flower every year. It is therefore likely that this population remains present at the Site. Two Priority species were recorded during the field surveys:

- *Dampiera heteroptera* (Priority 3), recorded in two locations; and
- *Stylidium ireneae* (Priority 4), recorded in five locations.

There were no Threatened or Priority-listed ecological communities identified at the Site, and no known Threatened or Priority ecological communities were considered likely to occur. Four vegetation complexes, described by Havel and Mattiske (1998), have less than 10% protected for conservation, and are considered Locally Significant Natural Area; Cowaramup (Cw1), Glenarty Hills (H), Glenarty Hills (Hw) and Wilyabrup (Wr).

Thirteen 13 floristic relevés were recorded throughout the Site, with areas of vegetation ranked from Excellent to Completely Degraded, and 18 introduced flora species opportunistically observed. Nine Vegetation Associations were mapped and described, based on structure and dominant overstorey species:

- Coastal Heath
- Jarrah Marri Peppermint Forest
- Karri Marri Forest
- Karri Patens Forest
- *Kunzea spathulata* Heath
- Marri Patens Peppermint Forest
- *Melaleuca raphiophylla* Woodland
- Peppermint over sedges
- Peppermint Woodland

The Site was surveyed for fauna over five days, including five dusk and five nocturnal surveys from October 2023 to January 2024. Two Threatened and one Priority fauna species were observed within the Site:

- *Zanda* sp. (White-tailed Black Cockatoo, T/EN),
- *Pseudocheirus occidentalis* (Western Ringtail Possum, T/CR), and
- *Isoodon fusciventer* (Quenda, P4).

Masked Owl (*Tyto novaehollandiae*, P3) and South-western Brush-tailed Phascogale (*Phascogale tapoatafa wambenger*, CD) were not observed, but are considered as having the potential to occur, due to the presence of suitable habitat. Chuditch (V), Peregrine Falcon (OS) and Rakali (P4) have potential to use the Site as part of a broader home range. Several wetlands were observed within the Site, considered suitable habitat for Rakali inhabitancy. Due to the limited extent of required clearing, particularly in context to surrounding, intact habitat, it is unlikely that this proposal will have a significant impact on the species. A preference to retaining mature trees that are likely to produce hollows is recommended. This will reduce the impact to these species.

PRELIMINARY CLEARING ASSESSMENT

Measures to avoid, minimise, mitigate and manage proposed clearing impacts

The final design was informed by the biodiversity survey results and focussed on avoiding or minimising native vegetation impacts. A key scope of the design brief was to avoid clearing of native vegetation where possible to maintain the vision for the Wadandi Track: *to create a world-class trail that showcases the Capes Region's unparalleled beauty and inspires awe and respect for its natural treasures*.

Avoidance

The project sought to avoid clearing native vegetation wherever practicable, primarily utilising the existing railway formation where revegetation was limited following decommissioning. In areas where substantial regrowth had occurred, impacts were further minimised through use of existing firebreaks, tracks and other cleared or degraded areas. Areas temporarily required during trail construction, such as laydown and stockpiling areas, will utilise cleared or degraded areas. Other components of the trail, such as trailheads, have been specifically located in sites that are already clear or disturbed. Native vegetation proposed to be cleared was typically limited to the most degraded portions and areas representing the least-impact alignment achievable.

Minimise, mitigate and manage

Where impacts could not be entirely avoided, they have been minimised wherever possible through design measures and environmental management. Several Management Plans will be implemented to control clearing and other impacts. These include but are not limited to

- Construction Environmental Management Plan (CEMP)
- Phytophthora Dieback Management Plan (PDMP) (Bark Environmental, 2026)
- Revegetation Management Plan or equivalent (RMP) (in preparation)
- Weed Management Plan or equivalent (WMP) (in preparation)

Key controls include but are not limited to

- Comprehensive management of native vegetation, significant flora and ecological communities, critical habitat for Threatened flora and fauna, fauna, drainage lines / wetlands, tenure (including sections adjacent National Park), dieback, weed control, and vehicle, plant and personnel movements through the CEMP.
- The CEMP also includes the requirements for erosion and sediment control in proximity of drainage lines or watercourses.
- Avoiding suitable DBH trees where possible and ensuring LG Environment Officer input prior to clearing (even though they have been applied to clear) (CEMP).
- An authorised fauna spotter will be present during the clearing to manage fauna within areas in line with DBCA Blackwood requirements – rapid assessment in Low Risk areas (Warren IBRA in isolated vegetation, and general clearing supervision in High Risk areas Warren IBRA connect habitat and all Swan Coastal Plain vegetation, or as agreed with DBCA) (CEMP).
- A suitably experienced and authorised botanist will supervise clearing within 10 m of Priority flora and 50 m of threatened flora (for example *C. lodgeana*) to undertake pre-disturbance checks and ensure protection of any plants. Clearing will be supervised in line with Flora Management (CEMP).
- Pre and post construction, a LG weed management program will map and target invasive species and will be developed into a WMP or equivalent as part of long term maintenance

of the rail reserve. The aim will be to ensure a long term net benefit to the vegetation condition of the track.

- Informal access into conservation areas will be closed where they intersect the track, which will result in a net benefit to the reserve. This will be carried out by the LG in consultation with DBCA as required.
- Revegetation, including infill planting and direct seeding with native species of local provenance from existing species lists, will be undertaken in cleared and degraded areas within the rail reserve. This will enhance habitat values, biodiversity, and ecosystem function, further reducing residual impacts of the project (RMP).
- Equipment and plant hygiene are to be managed though the PDMP.

Preliminary assessment of clearing impacts against the 10 clearing principles

In assessing whether the project is likely to have a significant impact on the environment, the application area (2.28 ha) was assessed against the ten Cclearing principles (EP Act 1986, Schedule 5) (Table 3).

The project **may be** at variance to clearing principle (f) - Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland (0.86 ha). The proposed clearing is **not** at or **not likely to be** at variance to any of the remaining clearing principles.

Representative site photos of the clearing application area, showing typical impacts proposed.



Degraded area, with only scattered native vegetation requiring clearing within 3.5 – 4 m along the raised formation



Area of relatively intact vegetation, in Very Good condition requiring clearing within 3.5 – 4 m along the raised formation



Cleared trail, with minor clearing potentially / pruning required along the edges



Narrow, cleared trail, with clearing required along the edges



Raised trail where track is weedy but adjacent areas maybe wet, though will not be impacted.



Raised trail where vegetation is in a Degraded condition along the raised formation, with limited regrowth having occurred. Large trees will be retained.

Table 1 Preliminary assessment against the 10 clearing principles

Clearing principle	Preliminary Assessment	Variance
(a) Native vegetation should not be cleared if it comprises a high level of biological diversity.	The proposed clearing is linear and narrow in nature, with a maximum disturbance width of 3.5 – 4 m. In most locations, however, the required disturbance footprint is expected to be substantially narrower (generally approximately 2.5 m wide, and potentially less in constrained areas). The application area therefore represents a conservative maximum disturbance envelope, rather than the extent of clearing likely to occur on-ground. The proposed works are predominantly aligned with the existing rail formation and associated disturbed areas. Consequently, degraded and previously disturbed portions of the corridor are inherently prioritised for disturbance, while more intact	**Not likely to be at variance**

Clearing principle	Preliminary Assessment	Variance

vegetation along the margins of the rail reserve are largely avoided and retained wherever practicable. In many locations, the proposed works will involve only limited edge pruning or narrow edge disturbance adjacent to the existing disturbed track formation.

Accordingly, the extent of Excellent and Very Good condition vegetation mapped within the application area is considered likely to overestimate the actual extent of higher quality vegetation that will require clearing.

The condition of the vegetation across the application area ranges from Excellent to Completely Degraded (Keighery, 1994), Table 3.1.

Table 3.1 Vegetation Condition within the application area

Vegetation Condition	SoAMR (ha)	CoB (ha)	Total (ha)
Excellent	0.10	-	0.10
Very Good	0.20	0.20	0.40
Good	0.21	0.05	0.26
Degraded	0.50	0.43	0.93
Completely Degraded	0.49	0.05	0.54
Cleared	-	0.02	0.02

Ten vegetation units (Table 3.2) occur with the application area.

Table 3.2 Vegetation Units recorded within the application area

Vegetation Unit	Name per report		Total (ha)
	(Ecosystem Solutions, 2025)	(SW Environmental, 2026)	
Jarrah Marri Forest	Jarrah Marri Peppermint Forest	VU 1: Jarrah-Marri open forest	0.25
Karri Forest	Karri Marri Forest	-	0.42
***Kunzea spathulata* heath**	*Kunzea spathulata* heath	-	0.12
Marri Patens Peppermint Forest	Marri Patens Peppermint Forest	-	0.26
Melaleuca forest	*Melaleuca rhaphiophylla* Woodland	VU 7: Melaleuca forest	0.36
Peppermint over sedges	Peppermint over sedges	-	0.03
Peppermint Woodland	Peppermint Woodland	-	0.10
Banksia woodland Kunzea scrub	-	VU 2: Banksia Woodland Kunzea Scrub	0.25
Claypan	-	VU 8: Claypan	0.048

Clearing principle	Preliminary Assessment				Variance
	Marri open forest	-	VU 4: Marri open forest	0.13	

There are several existing occurrences of Priority Ecological Communities (PECs) mapped within the application, some of which were confirmed during the current surveys.

Within the CoB section:

- Seasonal rainfall-filled wetlands with an impeding substrate of the Swan Coastal Plain and Jarrah Forest in transitional rainfall zones. This ecological community is recognised by DBCA as a Priority 1 PEC at the State level and is listed as Critically Endangered under the EPBC Act. The Claypan vegetation unit represents a known occurrence of this ecological community. The portion intersecting the application area is limited to approximately 0.048 ha and is in Degraded condition, with significant infestation by *Watsonia* spp. (Photo 1). The disturbed section associated with the existing track alignment is substantially weed-invaded and is not considered representative of the better condition examples of the community occurring elsewhere within the broader rail reserve. The current condition of this area appears to largely reflect relatively recent weed invasion and associated disturbance.

  The proposed works are confined to a narrow existing disturbance corridor and are not expected to result in significant impacts to the broader occurrence of the ecological community, including the more intact adjoining vegetation that contributes most substantially to ecological function, floristic diversity and habitat values. Given the limited extent, degraded condition and existing disturbance associated with the impact area, the proposal is not considered likely to result in a significant reduction in the biological diversity values of the community within the broader landscape.

  Mitigation measures for the project will include implementation of a Weed Management Plan, with weed control prioritised within areas of higher ecological value. Removal and ongoing management of *Watsonia* spp. and other environmental weeds within and adjacent to the disturbance footprint is likely to assist in improving the long-term condition and ecological function of this vegetation community.

Clearing principle	Preliminary Assessment	Variance



Photo 1 – Degraded track alignment traversing Claypan vegetation community

- Mapped occurrences of the Banksia Woodlands of the Swan Coastal Plain (listed as Endangered under the EPBC Act) also intersect the Survey Area, however based on the field survey, the vegetation within the application area does not meet the diagnostic criteria for the ecological community, primarily due to the limited representation of diagnostic *Banksia* species (Commonwealth of Australia, 2016; DAWE, 2016).

There were no other Priority or otherwise significant vegetation communities recorded within the CoB section.

The SoAMR application area does not include any Priority Ecological Communities (Ecosystem Solutions, 2025).

The Wadandi Track forms an important regional linkage corridor, with the broader rail reserve retaining a relative intact, linear corridor of vegetation through an otherwise fragmented landscape. The South West Regional Ecological Linkages (SWREL) project (Molloy et al., 2009) identifies vegetation within the application area (WALGA, 2022) occurring within the following ecological linkage categories:

- **1a:** with an edge touching or <100 m from a linkage: **3.03 km** of Survey Area
- **1b:** with an edge touching or <100 m from a natural area selected in 1a: **0.80 km** of Survey Area
- **3c**: with an edge touching or <1000 m from a natural area selected in 3b: **1.07 km** of Survey Area

Mitigation measures for this application include revegetation and rehabilitation works focused on improving structural and functional connectivity along the rail reserve corridor and strengthening linkages with adjoining areas of remnant vegetation.

The results of the DBCA database search for the CoB section identified 30 Priority flora species occurring within 5 km (DBCA, 2024a). Two Priority 4 flora species, *Acacia semitrullata* and *Gahnia sclerioides,* were recorded within the application area. The *Gahnia sclerioides* individuals occur along the margins of the proposed

Clearing principle	Preliminary Assessment	Variance
	alignment, within damp areas adjacent to the raised railway hardstand, and impacts to these plants are therefore considered unlikely. *Acacia semitrullata* plants occur adjacent to the proposed alignment, with four plants within the application area. Impacts to these plants will be avoided wherever possible, with implementation of the CEMP. No other Priority flora, or other flora of conservation significance, were recorded within the application area (SW Environmental, 2026). The results of the DBCA database search for the SoAMR section identified 60 Priority flora species occurring within 10 km. No Priority flora, or other flora of conservation significance, were recorded within the application area (Ecosystem Solutions, 2025). The results of the DBCA fauna database search identified eight Priority, one Conservation Dependent and one Other Specially Protected taxon occurring within 5 km of the CoB application area (SW Environmental, 2026). Within the SoAMR section, the desktop study (10 km) identified seven Priority, two Conservation Dependent and one Other Specially Protected taxon. Marine birds have been excluded (Ecosystem Solutions, 2025; SW Environmental, 2026). Habitat quality varied considerably across the Survey Area, with the proposed track formation generally supporting lower-quality vegetation and habitat than adjacent area. The application area represents a minor linear disturbance within a broader vegetated landscape and, given the limited clearing required and retention (including enhancement of some of the surrounding habitat through revegetation and weed management), the proposal is unlikely to result in significant impacts to flora, vegetation or fauna values, or high level of biological diversity. The application area has been designed via extensive on ground trail design and ground truthing, to preferentially utilise the existing disturbed rail corridor wherever practicable, thereby minimising impacts to higher value vegetation and habitat. In addition, mitigation measures including revegetation, rehabilitation and targeted weed management are proposed and are likely to improve the long-term condition and ecological function of the retained vegetation abutting the disturbance footprint. Given the limited extent and degraded nature of much of the application area, the retention of the majority of intact vegetation within the rail reserve corridor, and the absence of significant impacts to Priority flora and fauna, PECs or otherwise significant species or communities, the proposed clearing is not considered likely to result in a significant reduction in biological diversity within the local or broader landscape. The proposed **clearing is not likely to be at variance** to this clearing principle.	
(b) Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to	Habitat quality varied significantly within vegetation types and the proposed track formation exhibited much lower fauna habitat quality than adjacent areas. The desktop study identified 257 terrestrial (or semi-aquatic) vertebrate fauna taxa that may have occurred within the CoB locality (5 km), including 17 Threatened taxa (BC Act) and 16 Migratory birds. Additionally, two fish and ten invertebrates of conservation significance were returned. Forty-three fauna taxa were detected during surveys, including two Threatened species. Numerous other fauna species may have utilised the Survey Area as part of a broader habitat network. No hollow-bearing trees, black cockatoo breeding trees or roosts were recorded within or near to the clearing application area in either LGA by SW Environmental, (SW Environmental, 2026) or Ecosystem Solutions (2025). Six suitable DBH Marri	**Not likely to be at variance**

Clearing principle	Preliminary Assessment	Variance
Western Australia.	trees were recorded near the formation in the CoB area but will be retained (SW Environmental, 2026). No suitable DBH trees were recorded along the SoAMR sections by Ecosystem Solutions (2025). Baudin's Cockatoo and FRTBC foraging residue were recorded. No evidence of Carnaby's Cockatoo was recorded, although the species may utilise the site. Approximately 0.32 ha of native vegetation within the CoB application area was classified as high quality black cockatoo foraging habitat (maximum score 5 or over). Black cockatoo foraging scores were not calculated in Ecosystem Solutions (2025). Inferring foraging scores from vegetation types in good or better vegetation condition with primary feed species as key structural species would account for approximately 0.33 ha high quality black cockatoo foraging habitat (maximum score 5 or over) or with all vegetation including degraded with key foraging species up to 0.89 ha of high-quality black cockatoo foraging habitat (maximum score 5 or over). Foraging scores along the track alignment were, however, considered lower than adjacent areas due to the alignment representing only a small, disturbed portion of the broader reserve and comprising young regrowth, sparse canopy cover or low densities of feed species. Overhead canopy and associated feed resources would be retained (>2.4 m height). Seven WRP and one Common Brushtail Possums (CBP) were recorded within 100 m of the application area within the CoB. No WRP or CBP were recorded within the SoAMR, however two dreys were found (Ecosystem Solutions, 2025; SW Environmental, 2026). Quenda were recorded across both LGAs. SW Environmental (2026) noted that WRP records occurred within the Swan Coastal Plain IBRA bioregion, along with areas of intact midstorey or contiguous vegetation in the southern Jarrah Forest / Warren IBRA, or areas located within 500 m of drainage lines. WRP abundance was considered likely to decrease significantly moving further towards the south. In most areas, the partially disturbed and narrow linear nature of the corridor suggested that the area functioned primarily as supporting habitat and a movement corridor, rather than core habitat within the track alignment itself. Other conservation significant fauna taxa, including Quenda (detected), Carter's Freshwater Mussel, Dunsborough Burrowing Crayfish, South-western Brush-tailed Phascogale, Rakali and Peregrine Falcon, may occur locally, but are not likely to be impacted by the project (Ecosystem Solutions, 2025; SW Environmental, 2026). Individuals would be transient, or associate the track with movement through the landscape, rather than long-term occupation. This would be due to the narrow, linear extent of the Survey Area. Indirect impacts to Carters Freshwater Mussell or White Bellied Frog due to construction in proximity of drainage lines will be managed as noted in in the Design, Construction and Maintenance Specification (Common Ground, 2026) (Attachment 3a) and the CEMP. Overall, the proposed works involve a narrow linear disturbance footprint within a broader vegetated landscape. This, along with the limited clearing at any one location, and retention and enhancement of most habitat within the rail reserve, are factors that deem the project unlikely to result in measurable impacts to significant threatened fauna habitat. Implementation of the proposed avoidance and management measures (including fauna spotter) would further reduce potential impacts, with effects to threatened fauna expected to be negligible. At a local scale,	

Clearing principle	Preliminary Assessment	Variance
	the application area is unlikely to represent significant habitat for native fauna, due to its small size, linear nature and adjacent vegetation to be retained. The proposed **clearing is not likely to be at variance** with this principle.	
(c) Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, rare flora.	Flora surveys were undertaken by botanists from Ecosystem Solutions (2025) (SoAMR section), and SW Environmental (2026) (CoB section). These flora surveys, undertaken across the wider Survey Area, were conducted between the 24th of October and 28th of November 2023, 1st of October and 13th of November 2024 (SoAMR section), and the 26th of September to the 8th of December 2025 (CoB section). The application area was surveyed on the 26th of September 2025. Apart from the 8th of December, survey dates (appropriate for the target species) fall within recommended timing for the South West botanical province (EPA (2016) guidance). Opportunistic flora taxa were recorded whilst traversing the Survey Area. No Threatened flora taxa were recorded during the surveys. One Threatened flora species, *Caladenia lodgeana*, is known from adjacent to the SoAMR alignment. In addition to the reconnaissance survey on 30 October 2023, a targeted survey was completed on the 13 November 2024, coinciding with flowering of a nearby known population of *C. lodgeana*. The area surrounding the known record was searched during both survey periods; however, no individuals were recorded. Adjacent areas of suitable habitat were also traversed during both survey periods. Additional advice from Flora Conservation Officer, Blackwood District DBCA (6/11/25) noted unidentified orchid in the area but unlikely to be impacted. There is a low potential remaining for *C. lodgeana* to occur within the wider Survey Area, given the presence of suitable habitat , proximity of nearby records, and variable flowering patterns known for *Caladenia spp.* (DAFF, 2013). Occurrence within the application area itself, however, is unlikely. The application area, where adjacent to the known population, is centred on the existing cleared track. Disturbance in this area will be limited to edge pruning only. North of the known population, the application area follows an existing narrow track in Completely Degraded condition, bordered by vegetation in Very Good condition. The application area is aligned to the existing track, and only narrow edges of remnant vegetation require clearing. A flora specialist / botanist will be present during construction in this area to undertake pre-disturbance checks and ensure protection of any plants. The proposed **clearing is not likely to be at variance** to this clearing principle.	**Not likely to be at variance**
(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	The proposed clearing area intersects small areas of Marri Forest vegetation (SW Environmental, 2026), which are likely representative of *Corymbia calophylla* woodlands on heavy soils of the southern Swan Coastal Plain (floristic community type 1b as originally described in Gibson et al. 1994), listed as a Critically Endangered Threatened Ecological Community (TEC) under the BC Act. As detailed in the flora and vegetation report (SW Environmental, 2026) occurrences of this community within the application area have been mapped in Degraded	**Not likely to be at variance**

<table>
<tr><th>Clearing principle</th><th>Preliminary Assessment</th><th>Variance</th></tr>
<tr><td>ecological community.</td><td>condition. These comprise existing cleared hardstand, with significant impacts noted from multiple aggressive weed species.

Generally, an occurrence should be in Good or better condition to be considered an extant occurrence of a community (DBCA, 2024b; DEC, 2011). Additionally, the Degraded condition of vegetation means it is problematic to analyse it statistically, to determine whether it aligns with the diagnostic criteria for the relevant TEC. As such, it is considered that the portion of this vegetation community within the application area is degraded to the point that it no longer represents an extant occurrence of this community. No other TECs will be impacted.

The proposed clearing is not likely to be at variance to this clearing principle.</td><td></td></tr>
<tr><td>(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.</td><td>The EPA and national objectives and targets for biodiversity conservation have targets to prevent clearance of ecological communities with an extent below 30% of pre-European levels and to be reserved at over 10% (EPA, 2000).

The application area intersects the Pinjarra 949 and 1136 and the Boranup 1, 3, 27 and 1109 Vegetation Associations, as mapped by Beard (Beard et al., 2013). Pinjarra 949 and 1136 both occur solely within the CoB application area, and have less than 30% remaining, and with Pinjarra 1136 having less than 10% within DBCA managed reserves on a State level, with Pinjarra 949 having less than 10% at an IBRA, IBRA subregion and local government level. Based on the Native Vegetation Extent remaining (DPIRD, 2023) the application area includes 0.017 ha of Pinjarra 949 and 0.545 ha of Pinjarra 1136.

Table 3.3 Veg Pre-European vegetation representation (Government of Western Australia, 2019)
<table>
<tr><th>Pre-European Vegetation Association</th><th>Scale</th><th>Pre–European (ha)</th><th>Current Extent (ha)</th><th>% Remaining</th><th>% of Current Extent in DBCA reserves</th></tr>
<tr><td rowspan="4">Veg Assoc No. 1</td><td>Statewide</td><td>72,410.06</td><td>56,328.07</td><td>77.79</td><td>83.55</td></tr>
<tr><td>IBRA Warren</td><td>69,118.21</td><td>53,852.13</td><td>77.91</td><td>83.88</td></tr>
<tr><td>IBRA sub WAR01</td><td>69,118.21</td><td>53,852.13</td><td>77.91</td><td>83.88</td></tr>
<tr><td>LGA Shire of Augusta Margaret River</td><td>12,555.63</td><td>6,379.39</td><td>50.81</td><td>57.35</td></tr>
<tr><td rowspan="3">Veg Assoc No. 3</td><td>Statewide</td><td>2,661,404.62</td><td>1,803,437.48</td><td>67.76</td><td>81.50</td></tr>
<tr><td>IBRA Warren</td><td>250,262.10</td><td>195,318.18</td><td>78.05</td><td>87.11</td></tr>
<tr><td>IBRA sub WAR01</td><td>250,262.10</td><td>195,318.18</td><td>78.05</td><td>87.11</td></tr>
</table></td><td>Not likely to be at variance</td></tr>
</table>

Clearing principle	Preliminary Assessment						Variance
		LGA Shire of Augusta Margaret River	159,115.19	98,278.74	61.77	79.01	
	Veg Assoc No. 27	**Statewide**	130,385.33	92,501.98	70.95	83.50	
		IBRA Warren	70,203.73	52,262.13	74.44	89.25	
		IBRA sub WAR01	70,203.73	52,262.13	74.44	89.25	
		LGA Shire of Augusta Margaret River	9,656.26	3,448.88	35.72	55.25	
	Veg Assoc No. 949	**Statewide**	218,193.94	123,104.02	56.42	55.86	
		IBRA Swan Coastal Plain	94,175.31	24,869.20	26.41	19.18	
		IBRA sub SWA02	94,175.31	24869.20	26.41	19.18	
		LGA City of Busselton	2,688.98	417.58	15.53	0.05	
	Veg Assoc No. 1109	**Statewide**	34,325.41	32,723.07	95.33	80.80	
		IBRA Warren	33,365.10	32,174.15	96.43	81.10	
		IBRA sub WAR01	33,365.10	32,174.15	96.43	81.10	
		LGA Shire of Augusta Margaret River	4,674.46	4,064.08	86.94	63.94	
	Veg Assoc No. 1136	**Statewide**	48,124.57	3,345.51	6.95	3.85	
		IBRA Swan Coastal Plain	48,118.01	3341.18	6.94	3.86	
		IBRA sub SWA02	48,118.01	3341.18	6.94	3.86	

Clearing principle	Preliminary Assessment						Variance
		LGA City of Busselton	38,946.49	2,640.77	6.78	3.12	

Vegetation complexes of the Southwest Forest Region and Swan Coastal Plain (south of Lancelin) have been mapped at a scale of 1:50,000 and 1:250,000, respectively (DBCA, 2018a, 2018b; Heddle et al., 1980; Mattiske & Havel, 1998; Webb et al., 2016). These complexes are characteristic of various combinations in landform, soil and rainfall. Six vegetation complexes intersect the application area - comprising two within the Swan Coastal Plain (CoB) and four mapped within the SW Forest Region (SoAMR) (Table 3.4). The Abba, Southern River and Cowaramup (Cw1) complexes all fall below the 30% retention target, with less than 30% of their pre-European extent remaining (Table 3-2). Of these, the Abba Complex is of particular significance, with only 6.54% remaining, and 0.36% within DBCA reserves. All three of these vegetation complexes have less than 10% of their current extent within DBCA reserves.

Based on the Native Vegetation Extent remaining (DPIRD, 2023) the application area includes 0.44 ha of Abba, 0.13 ha of Southern River and 0.70 ha of the Cowaramup Cw1 vegetation complex.

Table 3.4 Vegetation complex classes within the application area (DBCA, 2019).

Vegetation Complex	Pre-European Extent (ha)	Current Extent (ha)	% Remaining	LGA, % Remaining	LGA		% of Current Extent in DBCA reserves
					CoB	SoAMR	
Abba Complex	50,892.78	3,326.20	6.54	6.64	X		0.36

Clearing principle	Preliminary Assessment	Variance

Southern River Complex	58,781.48	10,832.18	18.43	20.53	X		1.60
Blackwood, Bw	3,267.81	1,652.81	50.58	50.58		X	15.04
Cowaramup, C1	18,981.79	6,540.87	34.46	34.46		X	12.04
Cowaramup, Cw1	6,144.37	1,726.07	28.09	28.09		X	9.65
Wilyabrup, Wr	1,110.07	777.47	70.04	67.65		X	12.54

The South West Biodiversity Project (Molloy et al., 2007) provides criteria to identify and prioritise Locally Significant Natural Areas (LSNA). All vegetation complexes intersecting the application area meet one or more criteria for classification as an LSNA due to the extent of historical clearing within the region.

While portions of the application area intersect vegetation associations and vegetation complexes that have been extensively cleared at a various scales, the extent of clearing required is limited to a 3.5 - 4 m wide footprint or less, retention of canopy over 2.4 m high, and predominantly associated with vegetation in Degraded to Completely Degraded condition, with most areas of Good or better condition vegetation being on the edge of the proposed clearing area or adjacent to the existing disturbed alignment. The proposal is therefore not considered likely to significantly impact the representation, extent or ecological function of these remnant vegetation units within the broader landscape. Further the mitigation proposed will include revegetation of degraded areas and may result in a positive impact in relation to vegetation in some areas (RMP).

The proposed **clearing is not likely to be at variance** to this clearing principle.

(f) Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.	The term 'wetlands' refers to damplands, estuary-peripheral and water body, floodplains, palusplain and sumplands. The wetland categories are recognised by the EPA, the DBCA, and the Western Australian Planning Commission (WAPC) and other authorities. Within the CoB, the application area intersects two palusplain wetlands (one unreviewed - 0.10 ha and one Multiple Use - 0.38 ha) (Landgate, 2026). The multiple use wetland is no longer representative of a wetland, and the alignment is already raised through this section. It is not considered to impact wetland vegetation. The unreviewed wetland (0.10 ha section) is Banksia Woodland Kunzea Scrub in Good condition, and seasonally inundated, containing wetland species. This section is not raised. Therefore, some vegetation (up to 0.10 ha in a Good condition) growing in association with a wetland will be cleared. Within SoAMR the alignment transects several unreviewed wetlands (SLIP, 2026): • 1 Dampland (seasonally waterlogged basin) - 0.08 ha • 3 Paluslope wetlands – 0.89 ha • 4 Palusplain (seasonally waterlogged flat) wetlands – 0.40 ha • 4 Palusvale wetlands – 0.23 ha • 1 Sumpland (seasonally inundated basin) – 0.09 ha	**May be at variance**

Clearing principle	Preliminary Assessment	Variance
	These wetlands consist of seasonally-wet Jarrah Marri Peppermint Forest, Karri Marri Forest, *Kunzea spathulata* heath, Marri Patens Peppermint Forest, *Melaleuca rhaphiophylla,* Peppermint over sedges and Peppermint Woodland in Completely Degraded through to Excellent condition (Ecosystem Solutions, 2025). Vegetation in these areas (totalling 0.76 ha) appeared to comprise regrowth contiguous with surrounding vegetation and was not raised or otherwise distinguishable as a defined linear alignment. Clearing in these areas is likely to be in association with a wetland. Minor, non-perennial watercourses intersect the SoAMR sections at three locations along the alignment, covered by the wetland mapping intersections. Two occur at the upper reach of the Blackwood River. From north to south, vegetation at these locations consists of (Ecosystem Solutions, 2025): • *Melaleuca rhaphiophylla* in a Completely Degraded condition • Karri Marri Forest in a Degraded condition • Marri Patens Peppermint Forest in a Degraded condition Hydrology and flows along with stormwater and erosion and sedimentation will be maintained and managed as noted in in the Design, Construction and Maintenance Specification (Common Ground, 2026) (Attachment 3a) and the CEMP. Based on the small scale of proposed clearing and noting proposed management strategies, the proposal is not expected to significantly impact the function of any watercourses or wetlands. Localised impacts, however, are expected (up to 0.86 ha) including vegetation growing in, or in association with, an environment associated with watercourse or wetland. The proposed **clearing may be at variance** to this principle.	
(g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.	The proposed clearing is concentrated to the historic clearing footprint of the old rail formation. Clearing is narrow in nature and minimal at any one location. The application area intersects areas mapped as a Class 2 – moderate to low risk of Acid Sulfate Soil (ASS), occurring within 3 m of natural soil surface with a high to moderate risk of ASS beyond 3m of natural soil surface (2i - p2 and 2j - p4 within the City of Busselton and 2g - p3,4 and 2j - p4 within the SoAMR) (DWER, 2017; Landgate, 2026). Most soil disturbance will be shallow over the existing compacted gravel rail formation, or have fill added as a foundation rather than excavations. Contractors will ensure that equipment is clean before entering the site and wash down as required to minimize dieback spread (*Phytophthora cinnamomi*), if present. The PDMP and hygiene requirements of the CEMP for working in dieback infected/uninfected areas will be follows. The Department of Environment Regulation's document "Identification and investigation of acid sulfate soils and acidic landscapes" (DER, 2015) provides a guideline for ASS investigation requirements. Any works involving the lowering of the water table (temporary or permanent), earthworks extending beyond 3 m below the natural ground surface and works within 500 m of wetlands, will be subject to further ASS investigations, if required. The objective of an ASS investigation is to determine the extent to which soils and groundwater will be disturbed, determining the nature and extent of ASS and/or	**Not at variance**

Clearing principle	Preliminary Assessment	Variance
	non-ASS that may be impacted by the Project. This would be confirmed through the completion of an ASS self-assessment form, and if necessary, the preparation of an ASSDMP prior to construction. The ASSDMP will have the objective of preventing potentially adverse impacts to the environment because of soil acidification related to earthworks and dewatering activities. Stormwater and turbid runoff risks downslope will be managed under the CEMP to reduce the risks of erosion and sedimentation, particularly in proximity to drainage lines or watercourses. This may include measures such as bunding, and sediment fencing as required. No contaminated sites are mapped by DWER (2026) within 1.5 km of the proposed clearing. The project will not impact any contaminated sites. The proposed clearing is not likely to cause appreciable land degradation. The series of Management Plans will further prevent land degradation by ensuring the incorporation of the Wadandi Track vision: *to create a world-class trail that showcases the Capes Region's unparalleled beauty and inspires awe and respect for its natural treasures*: • Construction Environmental Management Plan (CEMP) • Phytophthora Dieback Management Plan (PDMP) (in preparation) • Revegetation Management Plan or equivalent (RMP) (in preparation) • Weed Management Plan or equivalent (WMP) (in preparation) The proposed **clearing is not to be 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.	The nearest DBCA-managed conservation area to the application area is the Leeuwin Naturaliste National Park, located approximately 350 m from the application area at its closest point, in the Augusta area. The application transects sections of local government-managed reserves; however, these are not designated for the purpose of conservation, apart from Walburra Nature Reserve which would not be impacted. The proposal represents a minor and highly localised linear disturbance within an existing modified corridor. It is not expected to result in significant indirect impacts to nearby conservation areas, including through fragmentation, hydrological alteration, spread of dieback, weed invasion, or reduction in habitat connectivity. Most surrounding native vegetation within the rail reserve corridor will be retained, and mitigation measures, including implementation of a CEMP, dieback hygiene measures, weed management and revegetation, are proposed. Informal access into conservation areas will be closed where they intersect the track, which will result in a net benefit to the reserve. This will be carried out by the LG in consultation with DBCA as required. Given the limited scale and nature of the proposed works, the separation distance from nearby conservation areas, and retention of the broader vegetated corridor, the proposal is not considered likely to adversely affect environmental values of adjacent or nearby conservation areas. The proposed **clearing is not at variance** to this principle.	**Not at variance**
(i) Native vegetation should not be cleared if the	The proposed clearing is not considered likely to cause any deterioration of surface or underground water. The work will be minor in scale and nature at any one location, and will largely align with any existing, compacted, historic rail formations.	**Not at variance**

Clearing principle	Preliminary Assessment	Variance
clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.	Significant changes in hydrology are not proposed. The Design, Construction and Maintenance Specification (Common Ground, 2026) (Attachment 3a) details the proposed track conduction. The CEMP and CMP will ensure that surface water flows are maintained and the risks of erosion and sedimentation are managed. The proposed **clearing is not at variance** to 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.	The application area intersects several mapped wetland systems within both the CoB and SoAMR sections, including palusplain, paluslope, palusvale, dampland and sumpland wetlands. Minor, non-perennial watercourses also intersect sections of the alignment. The proposed works are narrow and linear in nature and are predominantly aligned with the existing disturbed track formation and historic rail alignment. Existing hydrological function is aimed to be maintained. While some clearing of vegetation (associated with wetlands and minor drainage lines) will occur, the proposal is not expected to involve substantial filling, raised embankments or major alterations to natural drainage patterns. Project designs and management measures are provided in Common Ground (2026) (Attachment 3a) and the CEMP. While minor, localised track shaping or drainage infrastructure (e.g. culverts) may be required in some areas to maintain accessibility and track stability, measures will maintain local surface water movement and hydrological connectivity across the alignment, rather than impede it. Given the limited scale and nature of the proposed disturbance, retention of surrounding wetland vegetation, and absence of substantial drainage modification or floodplain obstruction, the proposal is not expected to significantly impede surface water movement, reduce flood storage capacity, or otherwise alter hydrological processes in a manner likely to cause or exacerbate flooding.' The proposed **clearing is not at variance** to this principle.	**Not at variance**

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ATTACHMENT 2

ATTACHMENT 3

ATTACHMENT 4