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Document Reference: EP23-085(22)--071 LRF

Emerge contact: [redacted]

31 July 2026

Attention: Native Vegetation Regulation
Department of Water and Environmental Regulation
Locked Bag 10
JOONDALUP WA 6919

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

Dear Sir/Madam,

CLEARING REFERRAL FOR VEGETATION REMOVAL TO SUPPORT ROAD UPGRADES AND TURBINE EQUIPMENT TRANSPORT ASSOCIATED WITH THE DEVELOPMENT OF PARRON WIND FARM

Regarding the letter's content outlined below, the following key terms are relevant in relation to this clearing application:

- **Site** - the extent of the disturbance footprint within which all proposed road upgrades and vegetation clearing/trimming will occur. The site covers an area of approximately 0.39 hectares (ha) across two locations.
- **Survey area** – the area surveyed to identify environmental values and inform the design and layout of the road upgrades at the intersections of Gould Road onto Rudds Gully Road and Brand Highway at Dongara.
- **Referral area** – the area of native vegetation proposed to be cleared, forming the subject of this clearing referral application. The referral area includes areas of both complete clearing and significant trimming where trunks or stems may be severed, consistent with the definition of clearing under the *Environmental Protection Act 1986* (EP Act). Up to 0.08 ha of native vegetation is proposed to be cleared or trimmed to facilitate road upgrades and turbine equipment transport.

This letter provides supporting information to be read in conjunction with the clearing permit application form and the following attachments.

- **Attachment A** – Main Roads Western Australia Authorisation for the Application of a Clearing Permit
- **Attachment B** – Shire of Irwin Authorisation for the Application of a Clearing Permit
- **Attachment C** – Road Transport Corridor Ecology Assessment
- A shape (.shp) file of the native vegetation clearing area has been submitted to Department of Water and Environmental Regulation (DWER) as part of the application.

1 INTRODUCTION

Emerge Associates (Emerge) were engaged by Zephyr Energy Pty Ltd (the applicant) to support the preparation of a clearing referral for the proposed intersection upgrades required to facilitate the transport of turbine components from the Port of Geraldton to the Parron Wind Farm.

This document provides supporting information for a Referral of Proposed Clearing (section 51DA of the *Environmental Protection Act 1986* (EP Act)) in relation to proposed clearing or modification of identified native vegetation, where it occurs within the site.

This supporting letter provides an assessment of the proposed clearing against all clearing referral criteria listed in Section 51DA(4) of the EP Act. Based on an assessment undertaken by Emerge against these criteria, there are clear grounds and justification that the clearing within the clearing referral area would result in very low environmental impacts.

2 PROPOSED WORKS

2.1 Context

The applicant is progressing development of the Parron Wind Farm within Lots 3738, 3739, 3742, 3743 and 3744 in Badgingarra. During construction, turbine equipment will be transported from the Port of Geraldton to the wind farm site. Due to the large size of some of the equipment, works such as removal or trimming of vegetation may be required at multiple road intersections in order to enable safe turning of transport vehicles. The locations of the proposed road upgrades (the site) in relation to the wind farm is shown on **Figure 1**.

2.2 Proposed Works

The proposed works within the site involves road widening, hardstand construction and modification of existing vegetation. The site occurs over two separate locations, 14.5 and 80.3 kilometres (km) south-southwest by road from Geraldton, Western Australia, at the intersections of Gould Road onto Rudds Gully Road and Brand Highway at Dongara respectively. The site covers an area of approximately 0.39 ha across the two intersections, as detailed on **Table 1** and shown on **Figure 2** and **Figure 3**.

Table 1: Summary of site details

ID	Name	Area (ha)	Disturbance type
1	Goulds Road onto Rudds Gully Road at Geraldton (14.5 kms)	0.12	Hardstand installation Vegetation trimming
2	Brand Highway at Dongara (80.3 kms)	0.27	Vegetation removal Hardstand installation Vegetation trimming Minor earthworks

The applicant is submitting this clearing referral to facilitate the removal of a small area of native vegetation in 'degraded' condition along the route from Geraldton Port to the Parron Wind Farm. The referral area occurs within road reserves and adjacent lots along the proposed route. Authorisation and support letters from the following parties have been obtained to support this clearing referral:

- Main Roads Western Australia (MRWA) – for works within road reserves (**Attachment A**).
- Shire of Irwin – for works within Lots 713 on Deposited Plan 231555 (**Attachment B**).

This clearing referral covers areas proposed for both clearing and trimming, including locations where trimming may sever trunks or stems, consistent with the definition of clearing under the *Environmental Protection Act 1986* (EP Act).

2.3 Clearing referral area

The native vegetation to be cleared is up to approximately 0.08 ha, the breakdown of this area into permanent clearing and vegetation trimming is shown below in **Table 2**. The location and extent of the site and referral area is shown on **Figure 2** and **Figure 3**.

Table 2: Clearing areas and future uses

Clearing Area	Area (ha)	Future use
Permanent clearing	0.077	Pavement or hardstand associated with road widening, future turning lane and relocated/newly constructed streetlights.
Vegetation trimming (at height of 3.5m)	0.006	Blade overhang area which will be trimmed and maintained to below 3.5 m during the transport period and left to regrow at the completion of transport.

3 SUMMARY OF ENVIRONMENTAL CONDITIONS

3.1 Ecological assessment

Emerge Associates (2025) undertook an ecological survey across the survey area including surveying plant communities, fauna habitat, and vegetation condition (see **Attachment C**). This survey was undertaken over a broader area at each intersection location to allow for flexibility as the design progressed. Vegetation within the survey area at Brand Highway at Dongara and Goulds Road onto Rudds Gully Road ranged from 'degraded' to 'completely degraded', and as such is not likely to contain important habitat for conservation significant species or communities (see **Figure 6** and **Figure 7**).

The vegetation, flora and fauna values for the broad survey area and the site are detailed on **Table 3** below.

Table 3: Summary of ecological values within the broad survey area and the site

Vegetation unit	Vegetation condition	Fauna habitat	Conservation significance	Survey area (ha)	Site (ha)
Ar Scattered *Acacia rostellifera* tall shrubs over non-native grasses and herbs	Degraded	Shrubland	Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	0.051	< 0.001
Ec *Eucalyptus camaldulensis* subsp. *arida* over dense cover of non-native grasses including **Cenchrus setaceus, *Avena sp.* with scattered non-native herbs **Fumaria capreolata*	Degraded	Woodland	Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	0.086	0.082
Non-native Predominantly non-native plants such as **Lycium ferocissimum, *Avena* sp., **Hyparrhenia hirta* and **Lupinus cosentinii*, **Echium plantagineum*	Completely degraded	Non-native grassland	Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	0.406	0.305

3.2 Existing environmental values within the site

The site has been subject to historical vegetation clearing and disturbance and generally contains low value ecological features. Based on a desktop review of publicly available datasets and the outcomes of the ecology assessment (Emerge Associates 2025) (**Attachment C**), the site contains the following environmental values:

- Native vegetation pursuant to the EP Act within the site totals approximately 0.08 ha and comprises two (2) vegetation units as follows:

  - The Goulds Road onto Gully Road portion of the site contains less than 0.001 ha of **Ar** vegetation, as shown on **Figure 4**.
  - The Brand Highway at Dongara portion of the site contains approximately 0.08 ha of **Ec** vegetation, as shown in **Plate 1** and **Figure 5**.
- Native vegetation within the site was determined to be in 'degraded' condition, as shown on **Figure 6** and **Figure 7**.
- Approximately 0.31 ha of non-native vegetation occurs within the site, generally comprised of non-native understory species and planted trees. The Goulds Road and Rudds Gully Road intersection may involve the clearing or pruning of a non-native planted *Eucalyptus* tree (as determined by 2001 historical aerial imagery review (Landgate 2026) and field notes from the ecological survey (Emerge Associates 2025)).
- No conservation significant flora, ecological communities or fauna were recorded within the site, and none are considered likely to occur due to lack of suitable habitat.
- The site does not intersect any existing conservation reserves, Bush Forever sites or mapped ecological linkages.
- The site does not intersect any mapped wetlands.
- The portion of the site associated with Brand Highway at Dongara is within the extent of Aboriginal Cultural Heritage Register 18907 (Irwin River). Ongoing consultation is being undertaken with the Yamatji South Regional Corporation to determine appropriate management measures.
- No Acid Sulfate Soils (ASS) risk mapping exists for much of the Wheatbelt region, including the site. Generally, if ASS are present within a site, these would occur beneath the lowest seasonal groundwater levels, and risks only posed when activities are proposed to extend below the groundwater levels, through either deep excavation of dewatering. No dewatering or excavation below groundwater is expected during intersection upgrade works, and therefore the potential risk of ASS is very low.
- The DWER Contaminated Sites Database (DWER 2026) indicates that the site at Goulds Road and Rudds Gully Road intersection intersects 'Road Reserve - Goulds Road' which is classified as 'contaminated – restricted use'. The Summary of Records indicates that elevated levels of gamma radiation at the site have been detected, and it should not be developed for a more sensitive use such as residential use, childcare centres, or recreational open space without further assessment or remediation. The proposed use is not considered a sensitive use.



Plate 1: Brand highway at Dongara vegetation showing native Eucalyptus camaldulensis subsp. arida trees over non-native grasses

4 APPLICATION OF MITIGATION HIERARCHY

In accordance with *A guide to the assessment of applications to clear native vegetation* (DER 2014), the impact mitigation sequence has been considered as part of the proposed clearing, in order to ensure the environmental impact was kept to a minimum.

4.1 Avoidance

As the required clearing is primarily driven by compliance with Main Road Western Australia (MRWA) standards and the engineering design of the upgraded intersection, opportunities to avoid clearing are limited. Nonetheless, avoidance has been a key consideration throughout the design process and will be implemented as follows:

- The referral area has been refined to ensure that clearing is limited to the minimum area necessary to accommodate safe vehicle movements, turbine component transport, and construction requirements. Only clearing essential for road widening, intersection upgrades, and safe turbine transport will be completed.
- To support the avoidance process, detailed swept path analysis has been undertaken to accurately determine the minimum space required for vehicle manoeuvring and component transport. Swept path analysis models the movement envelope of oversize vehicles as they travel along the nominated transport route, enabling precise identification of vegetation that must be cleared for safe passage. This ensures that clearing is restricted to only what is essential, and that any unnecessary removal of native vegetation beyond safety and design requirements is avoided.

4.2 Mitigation

Where avoidance is not possible, mitigation measures will be implemented to reduce the intensity and/or extent of the impact:

- Where possible, vegetation has been retained within blade over sail areas, with trimming only required for those trees that have the potential to obstruct transport vehicles (greater than 3.5 m in height).
- Implementation of hygiene protocols during the clearing and construction process to minimise introduction/spread of weeds and plant pathogens. This will include:
    - Vehicles, machinery, and personnel to be free of mud/soil and plant material upon entering the site. Inspections to be completed prior to works commencing.
    - Minimising clearing and earthworks during wet conditions.

These mitigation measures are designed to complement avoidance strategies and ensure that, where clearing or trimming is necessary, environmental impacts are minimised and retained vegetation is protected to the greatest extent practicable.

4.3 Rehabilitation

Natural regeneration will commence within areas of the site where permanent pavements or hardstand have not been installed following completion of construction and haulage activities. Trees that have been trimmed and are still viable will potentially reshoot. Where topsoil is removed and stockpiled during clearing, this be reinstated across temporary construction clearing areas. It is anticipated that native vegetation surrounding the cleared area will also allow the regeneration to occur.

4.4 Offsets

The assessment of residual impacts, following application of the mitigation hierarchy, has indicated whilst some impacts are expected as a result of the proposed development, these can be managed and there is no significant residual impact predicted. Accordingly, no offsets have been proposed.

5 RESPONSE TO EP ACT CLEARING PRINCIPLES

DWER's referral process supports a risk-based approach to assessing native vegetation clearing proposals by establishing a pathway to assess very low impact clearing activities that are deemed not to require a permit. When assessing the clearing referral, DWER have regard to the referral criteria listed in Section 51DA(4) of the EP Act. In support of this clearing referral, the four referral criteria have been considered and responded to, provided in **Table 4**.

Table 4: Response to EP Act clearing referral criteria

EP Act s51DA(4) criteria	Response to the EP Act clearing referral criteria
Criterion 1: The area proposed to be cleared is small relative to the total remaining vegetation • Relative to the total remaining vegetation in the region where the proposed clearing is located, and • Relative to the total remaining vegetation of the ecological community that the vegetation proposed to be cleared forms a part of	The site is located within the 'intensive land-use zone' of the southwest agricultural region (DPIRD-008). The *Native Vegetation Clearing Referrals Guideline* ('the Guideline') (DWER 2021) states that if the extent of the proposed clearing is more than 1 ha, a clearing permit is required. The proposed clearing is approximately 0.08 ha of native vegetation, which is less than the 1 ha threshold and is anticipated to result in a very low environmental impact. The native vegetation clearing area is located within the Geraldton Sandplains Biogeographic Regionalisation for Australia (IBRA) region (previously 'Northern Sandplains' region) of Western Australia. The 'Greenough_359' association was determined to have 24.69% of its pre-European extent remaining in the Geraldton Sandplains region in 2019, with <0.01% protected for conservation purposes. The 'Irwin_352' association was determined to have 13.21% of its pre-European extent remaining in the Geraldton Sandplains region in 2019, with 0.38% protected for conservation purposes (Government of Western Australia 2019). However, vegetation within the clearing referral area is highly disturbed and was mapped as 'completely degraded' and 'degraded' as part of the Ecological Assessment (Emerge Associates 2025) and is not representative of an intact occurrence of this complex. A review of the current native vegetation extent dataset (DPIRD-005) indicates approximately 41% of native vegetation cover remains within the surrounding 5 km area of the site. This exceeds the 10% threshold specified in the Guideline.

Table 4: Response to EP Act clearing referral criteria (continued)

EP Act s51DA(4) criteria	Response to the EP Act clearing referral criteria
Criterion 2: There are no known or likely significant environmental values within the area • Biological values (e.g. flora, fauna, ecological communities) • Conservation values (e.g. impact to ecological linkages, conservation areas and heritage values) • Land and water resource values (e.g. wetlands and watercourses, water resources, land and soil quality)	No known or likely significant environmental values occur within the area, as summarised below. As such, the proposed clearing is not at variance with this criterion. <u>Biological values</u> • The referral area is mapped as comprising vegetation in 'Completely Degraded' and 'Degraded' condition, based on the Ecological Assessment (Emerge Associates 2025). • The referral area does not contain any threatened or priority flora, ecological communities or fauna, and none are considered likely to occur due to the degraded condition of the native vegetation (refer to **Attachment C**). <u>Conservation values</u> • The referral area does not intersect any mapped regional ecological linkages. • The referral area does not intersect any conservation reserves (e.g. Bush Forever, Environmental Protection Policy areas, DBCA managed land, Regional Open Space, or crown reserves vested for conservation purposes). • The referral area associated with Brand Highway at Dongara is within the extent of Aboriginal Cultural Heritage Register 18907 (Irwin River). Ongoing consultation is being undertaken with the Yamatji South Regional Corporation to determine appropriate management measures. <u>Land and water resource values</u> • The referral area does not contain, nor is it in proximity to, any wetlands listed under the Convention on Wetlands of International Importance (Ramsar Convention) or the Directory of Important Wetlands in Australia, or wetlands classified as 'conservation category' or 'resource enhancement' in the DBCA *Geomorphic wetlands* database. • The referral area does not intersect with or impact upon a watercourse. While limited clearing and vegetation trimming is proposed near the Irwin River at the Brand Highway at Dongara intersection (~15 m), no works are proposed within the river or its banks. Given the minor scale of the proposed works, together with the implementation of standard construction environmental controls (including erosion and sediment control measures), no direct or indirect impacts to the Irwin River are anticipated. • The referral area is not within a public drinking water source area. • The DWER Contaminated Sites Database indicates that the site at Goulds Road and Rudds Gully Road intersection intersects 'Road Reserve - Goulds Road' which is classified as 'contaminated – restricted use'. The Summary of Records indicates that elevated levels of gamma radiation at the site have been detected, and it should not be developed for a more sensitive use such as residential use, childcare centres, or recreational open space without further assessment or remediation. The proposed use is not considered a sensitive use. • No ASS risk mapping exists for much of the Wheatbelt region, including the site. However, no dewatering or excavation below groundwater is expected during intersection upgrade works, and therefore the potential risk of ASS is very low.
Criterion 3: The state of scientific knowledge of native vegetation within the region is adequate	The site is located within the Geraldton Sandplains bioregion. Various databases, spatial datasets and other relevant readily available information is available for the site and the broader region. Additionally, an ecological assessment of the proposed route has been completed which included coverage across the site (see **Attachment C**). The state of scientific knowledge of native vegetation in the region (and locally) is adequate. As such, the proposed clearing is not at variance with this criterion.
Criterion 4: Conditions will not be required to manage environmental impacts	An ecological assessment of the proposed transport route determined that the extent of impacts is low and no significant impacts to MNES or State-listed threatened and priority species are considered likely to occur (see **Attachment C**). As such, the proposed clearing is not at variance with this criterion.

6 SUMMARY

The referral area under application proposes the clearing of approximately 0.08 ha of native vegetation in 'degraded' condition. No conservation significant values for flora, ecological communities, fauna or fauna habitat were identified within the referral area due to the degraded condition of native vegetation and lack of suitable habitat within the site.

The applicant has undertaken processes to avoid and minimise the clearing of native vegetation and has included consideration of rehabilitation to occur across the referral area.

Overall, the proposed clearing activities are assessed to have a very low environmental impact and are not considered to be at variance with the four referral criteria outlined in the EP Act and the clearing referral guidelines, which have been addressed in detail within this letter.

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

Yours sincerely
Emerge Associates



Jason Hick
PRINCIPAL ENVIRONMENTAL CONSULTANT

Encl: Clearing Referral Form
Shapefiles of referral areas

Figure 1: Site Location
Figure 2: Referral Area – Goulds Road and Rudds Gully Road
Figure 3: Referral Area – Brand Highway at Dongara
Figure 4: Vegetation Units – Goulds Road and Rudds Gully Road
Figure 5: Vegetation Units – Brand Highway at Dongara
Figure 6: Vegetation Condition – Goulds Road and Rudds Gully Road
Figure 7: Vegetation Condition – Brand Highway at Dongara

Attachment A: Main Roads Western Australia Authorisation for the Application of a Clearing Permit
Attachment B: Shire of Irwin Authorisation for the Application of a Clearing Permit
Attachment C: Road Transport Corridor Ecology Assessment (Emerge Associates 2025)

General References

Department of Environment Regulation (DER) 2014, *A guide to the assessment of applications to clear native vegetation under Part V Division 2 of the Environmental Protection Act 1986*, Perth.

DWER 2021, *Guideline Native Vegetation Clearing Referrals*

Department of Water and Environmental Regulation (DWER) 2026, *Contaminated Sites Database*, <https://dow.maps.arcgis.com/apps/webappviewer/index.html?id=c2ecb74291ae4da2ac32c441819c6d47>.

Emerge Associates 2025, *Road Transport Corridor Ecology Assessment Parron Wind Farm*, EP23-085(20)—043 RAW, Version 1.

Government of Western Australia 2019, *2018 Statewide Vegetation Statistics incorporating the CAR Reserve Analysis (Full Report). Current as of March 2019*, WA Department of Biodiversity, Conservation and Attractions, Perth.

Landgate 2026, *Map Viewer Plus*.

Figures

Figure 1: Site Location

Figure 2: Referral Area – Goulds Road and Rudds Gully Road

Figure 3: Referral Area – Brand Highway at Dongara

Figure 4: Vegetation Units – Goulds Road and Rudds Gully Road

Figure 5: Vegetation Units – Brand Highway at Dongara

Figure 6: Vegetation Condition – Goulds Road and Rudds Gully Road

Figure 7: Vegetation Condition – Brand Highway at Dongara

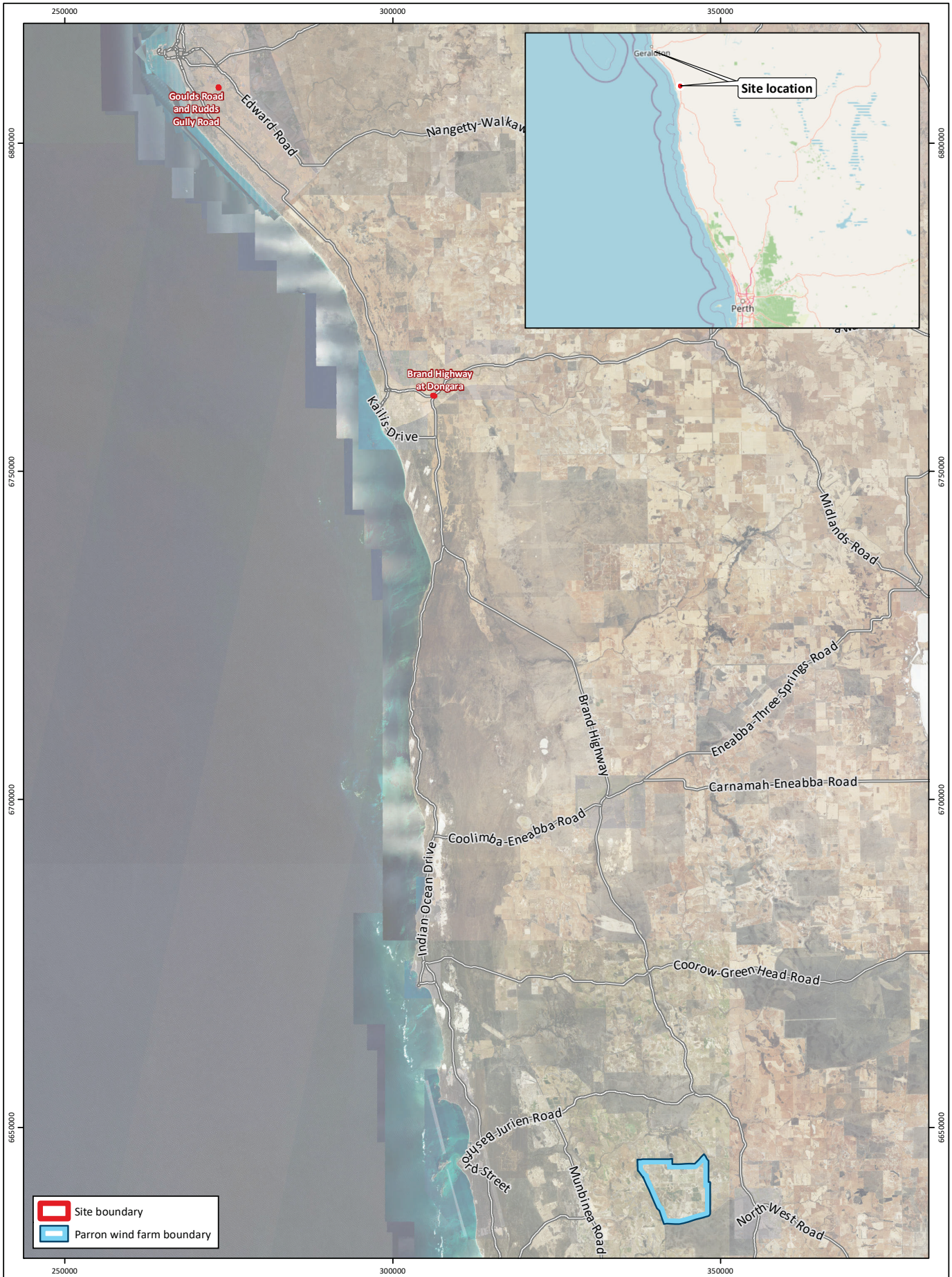


Figure 1: Site Location

Project:	Clearing Referral Application Parron Windfarm Transport Corridor
Client:	Zephyr Energy Pty Ltd

Plan Number: EP23-085(22)--F263

Drawn:	WJC
Date:	26/05/2026
Checked:	LRF
Approved:	CIB
Date:	31/07/2026

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Metres

Scale: 1:750,000@A4

GDA2020 MGA Zone 50

emerge ASSOCIATES

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Figure 2: **Referral Area - Goulds Road and Rudds Gully Road**

Project: Clearing Referral Application
Parron Windfarm Transport Corridor

Client: Zephyr Energy Pty Ltd

Plan Number: **EP23-085(22)--F264**
Drawn: WJC
Date: 26/05/2026
Checked: LRF
Approved: CIB
Date: 31/07/2026

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Metres

Scale: 1:800@A4

GDA2020 MGA Zone 50

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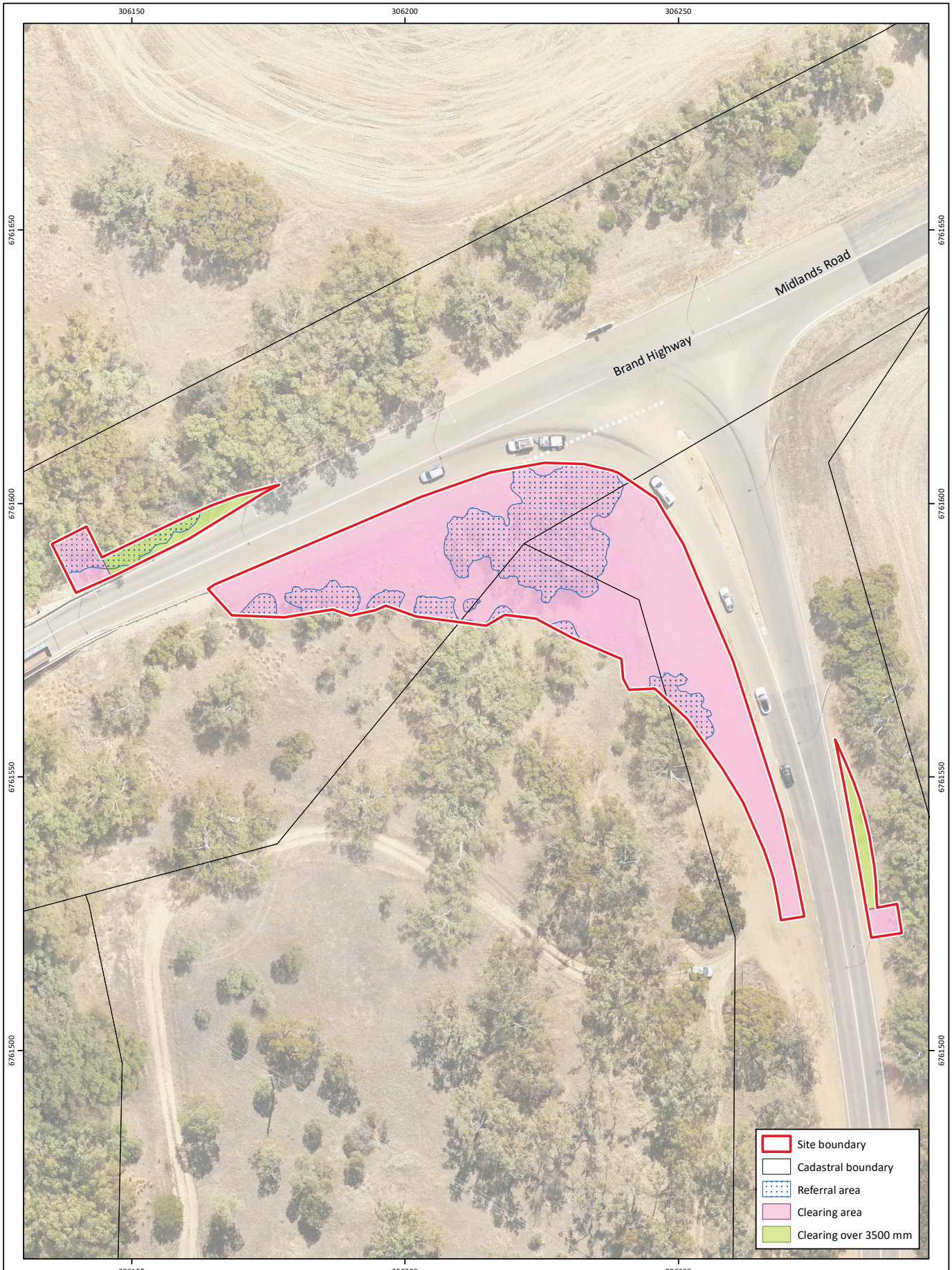


Figure 3: **Referral Area - Brand Highway at Dongara**

Project: Clearing Referral Application
Parron Windfarm Transport Corridor

Client: Zephyr Energy Pty Ltd

Plan Number:
EP23-085(22)--F265

Drawn:	WJC
Date:	26/05/2026
Checked:	LRF
Approved:	CIB
Date:	31/07/2026

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Metres

Scale: 1:900@A4

GDA2020 MGA Zone 50

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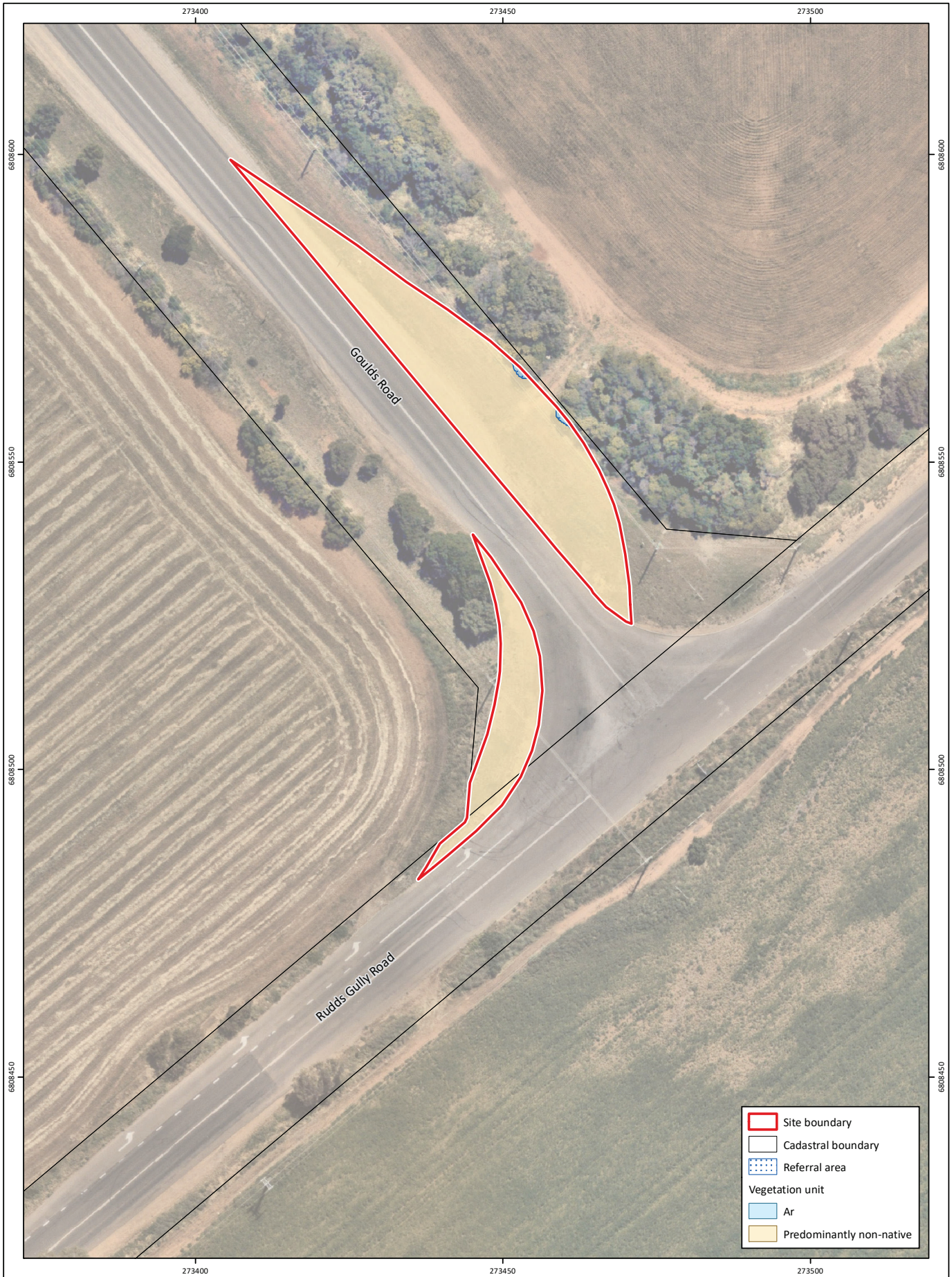


Figure 4: **Vegetation Units - Goulds Road and Rudds Gully Road**

Project: Clearing Referral Application
Parron Windfarm Transport Corridor

Client: Zephyr Energy Pty Ltd

Plan Number: **EP23-085(22)--F266**
Drawn: WJC
Date: 26/05/2026
Checked: LRF
Approved: CIB
Date: 31/07/2026

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Metres

Scale: 1:800@A4

GDA2020 MGA Zone 50

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Figure 5: **Vegetation Units - Brand Highway at Dongara**

Project: Clearing Referral Application
Parron Windfarm Transport Corridor

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(22)--F267

Drawn:	WJC
Date:	26/05/2026
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Date:	31/07/2026

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GDA2020 MGA Zone 50

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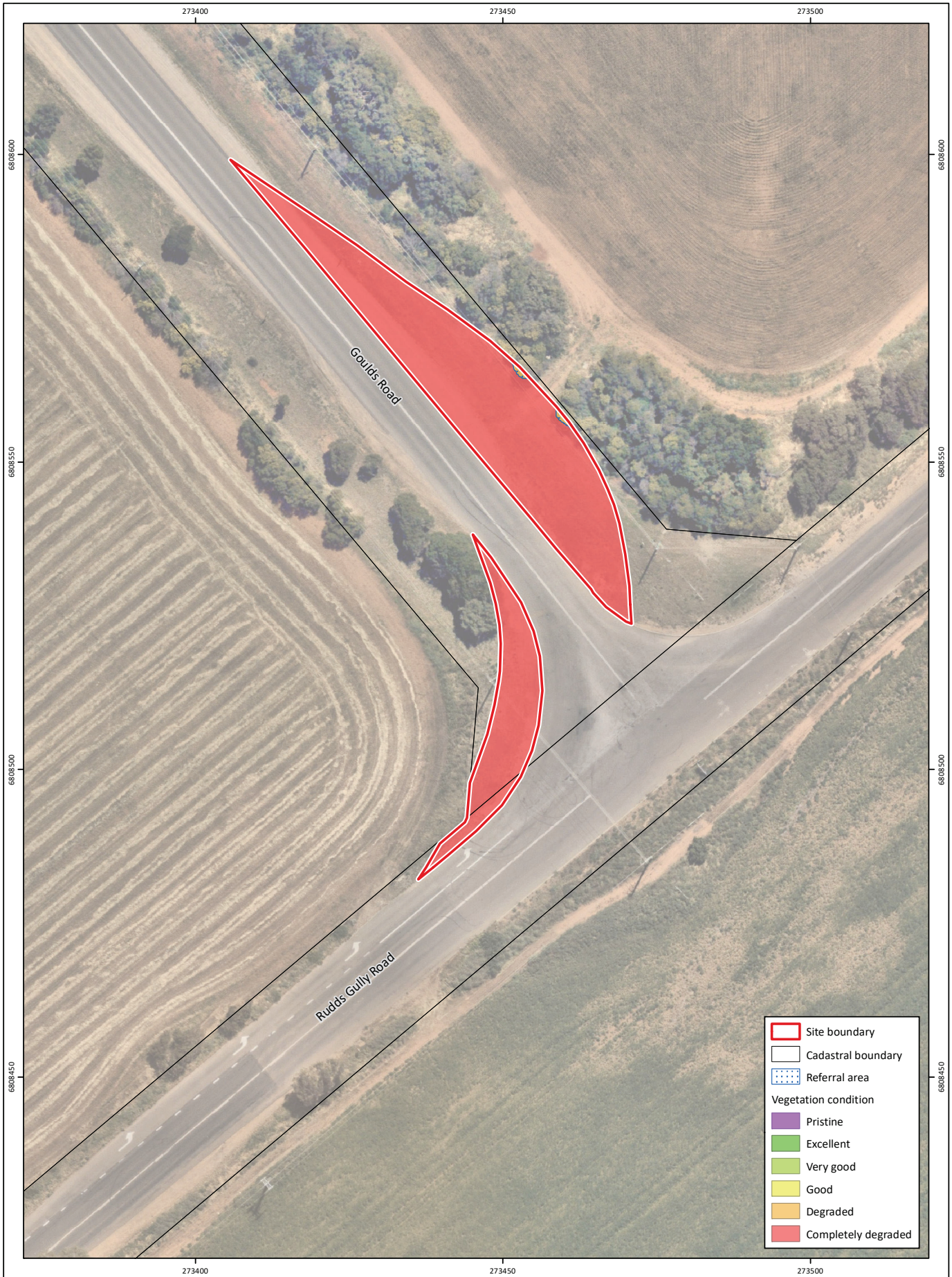


Figure 6: **Vegetation Condition - Gould Road and Rudds Gully Road**

Project: Clearing Referral Application
Parron Windfarm Transport Corridor

Client: Zephyr Energy Pty Ltd

Plan Number: **EP23-085(22)--F268**
Drawn: WJC
Date: 26/05/2026
Checked: LRF
Approved: CIB
Date: 31/07/2026

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Metres

Scale: 1:800@A4

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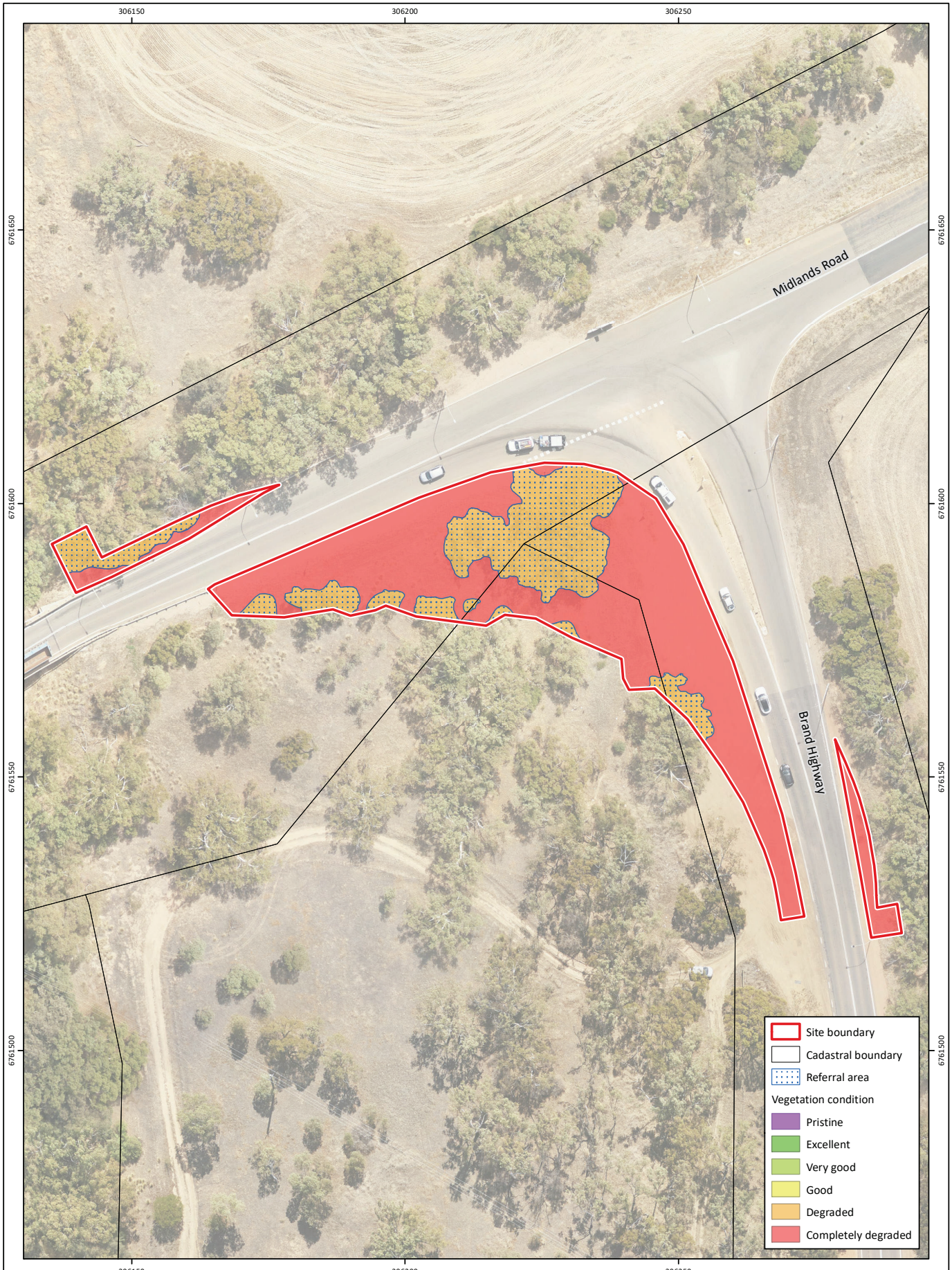


Figure 7: **Vegetation Condition - Brand Highway at Dongara**

Project: Clearing Referral Application
Parron Windfarm Transport Corridor

Client: Zephyr Energy Pty Ltd

Plan Number:
EP23-085(22)--F269

Drawn:	WJC
Date:	26/05/2026
Checked:	LRF
Approved:	CIB
Date:	31/07/2026

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Metres

Scale: 1:900@A4

GDA2020 MGA Zone 50

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Attachment C

Road Transport Corridor Ecology Assessment

TECHNICAL MEMORANDUM
Road Transport Corridor Ecology Assessment
Parron Wind Farm

PROJECT NUMBER	EP23-085(20)	**DOC. NUMBER**	EP23-085(20)—043B RAW
PROJECT NAME	Parron Wind Farm	**CLIENT**	Zephyr Energy Pty Ltd
AUTHOR	RAW	**REVIEWER**	JDH
VERSION	B	**DATE**	31/07/2026

1. INTRODUCTION

1.1. Background

Zephyr Energy propose to develop the Parron Wind Farm within lots 3738, 3739, 3742, 3743 and 3744 in Badgingarra, as shown in **Figure 1**. During construction turbine equipment will be transported from the Port of Geraldton to the wind farm site. Due to the large size of some of the equipment, works such as removal or trimming of vegetation may be required at multiple road intersections in order to enable safe turning of transport vehicles.

The *Route Study Geraldton Port to Parron WF (Rex J Andrews Engineered Transportation 2024)* identified areas subject to disturbance, which have been further refined following detailed engineering design. Of these disturbance areas, four have potential impacts to ecological values, as outlined in **Table 1**. These areas and a 5 metre (m) buffer are referred to herein as the 'survey area', as shown in **Figure 1**.

Table 1: Summary of survey areas

ID	Name	Area (ha)	Disturbance type
1	Goulds Road onto Rudds Gully Road at Geraldton (14.5 kms)	0.28	Hardstand installation Vegetation trimming
2	Rudds Gully Road onto Brand Highway at Geraldton (18.0 kms)	0.10	Blade oversail on vegetation
3	Brand Highway at Dongara (80.3 kms)	0.27#	Vegetation removal Hardstand installation Vegetation trimming Streetlight relocation
4	Brand Highway onto Cowalla Road at Badgingarra (221.0 kms)^	0.44#	Vegetation removal Hardstand installation Lopping of vegetation ≥3500 mm high

^part of this area was previously surveyed as part of the Parron Wind Farm site surveys (Emerge Associates 2024b),

#includes 5 m buffer around disturbance area.

While Zephyr Energy is unlikely to be the proponent for all of the identified road works, this work has been commissioned to understand any potential ecological and therefore environmental approval risks associated with another proponent (i.e. not Zephyr Emergy) undertaking these works, however noting that ID 4 (Brand Highway onto Cowalla Road) is included as part of the Parron Wind Farm proposal and associated disturbance footprint.

1.2. Purpose and scope of work

Zephyr Energy engaged Emerge Associates to undertake a flora, vegetation and fauna assessment within the survey area to understand the existing values and level of ecological impact associated with the proposed transport route.

As part of this scope of work, the following tasks were undertaken:

- Desktop study to provide contextual information and determine the likelihood of occurrence of threatened and priority flora or ecological communities.
- Field survey to record vegetation units, vegetation condition and fauna habitat and to conduct targeted searches for threatened and priority flora species. This comprised the following:
  - A 'detailed' and a 'targeted' flora and vegetation assessment in accordance with the EPA's *Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment* (EPA 2016).
  - A 'basic' fauna survey and a 'targeted' black cockatoo assessment with reference to the EPA's *Technical Guidance: Terrestrial Fauna Surveys* (EPA 2016) and the *Environment Protection and Biodiversity Conservation Act 1999* black cockatoo referral guidelines (DAWE 2022).
- Analysis and mapping of contextual information, vegetation units, vegetation condition, fauna habitat and threatened and priority flora or ecological communities (if present).

This document provides a summary of the key results of the assessment and extent of impacts to ecological values.

2. METHODS

An experienced botanist visited the site on 24 and 25 September 2024 to conduct the field survey. The site was traversed on foot and the composition and condition of vegetation was recorded. Plant specimens were collected where the identity of flora required further confirmation. Photographic images and notes were recorded as required.

2.1. Flora

Flora were identified through comparison with named material and through the use of taxonomic keys. Plant specimens collected during the field survey were dried, pressed and named in accordance with requirements of the Western Australian Herbarium (2024). Flora was classified as native if indigenous to the IBRA region in which the site occurs. Non-native flora is denoted by '*' in text and raw data.

Targeted searches were conducted for threatened and priority flora and ecological communities within areas of suitable habitat. Transects and records were marked using a hand-held GPS receiver (±5 m accuracy).

2.1. Vegetation

Vegetation units were identified from data collected during the field survey. The vegetation was described according to the dominant species present using the structural formation descriptions of the *National Vegetation Inventory System* (NVIS) (NVIS Technical Working Group 2017).

Vegetation condition was assessed and mapped using the EPA (2016) scale as adapted from Keighery (1994).

Vegetation units were assessed against TEC and PEC diagnostic characteristics and, if available, size and/or vegetation condition thresholds (DBCA 2023). TECs and PECs were confirmed as absent from the site where no significant limitation was identified that could have affected their detection.

2.2. Fauna

Fauna habitat was mapped based on vegetation unit and condition and notes taken in the field, with a particular focus on identifying habitat for conservation significant fauna species.

3. RESULTS

A summary of the ecological values within each area of the site is provided in **Sections 3.1 - 3.4.**

Vegetation units across the survey are shown on **Figure 2**, with vegetation conditions shown on **Figure 3**.

3.1. Goulds Road onto Rudds Gully Road at Geraldton

This survey area has been subject to historical disturbance and generally contains low value ecological features.

Vegetation unit **Ar** comprises native shrubs but has low species diversity and a weedy ground layer. This vegetation is endemic and assumed to represent native vegetation pursuant to the *Environmental Protection Act 1986* (EP Act). Due to its location between a road verge and paddock, it may have been planted but there is insufficient evidence to support this given aerial imagery only extends back to 2000 (WALIA 2024). Part of **Ar** lies within the 'vegetation to be trimmed' disturbance area and so these shrubs will be subject to pruning which is considered a low impact.

Vegetation unit **E** comprises one low native *Eucalyptus* sp. tree, outside of the proposed disturbance footprint, which has been subject to intense winds and ongoing lopping and as such comprises a low mallee form tree in poor condition. Similar to **Ar**, this tree is endemic and appears to represent native vegetation pursuant to the EP Act.

The remainder of the area comprises **non-native** vegetation, of which some will be removed for hardstand installation or subject to trimming. The disturbance footprint overlaps with the canopy of a roadside *Eucalyptus* sp. tree which, based on a review of historical aerial imagery from 2001 (WALIA 2024), is considered to have been planted.

A summary of ecological values within this survey area is provided in **Table 2**.

Table 2: Summary of ecological values within 'Goulds Road onto Rudds Gully Road at Geraldton' survey area

Vegetation unit	Vegetation condition	Fauna habitat	Conservation significance	Area (ha)
Ar Scattered *Acacia rostellifera* tall shrubs over non-native grasses and herbs	Degraded	Shrubland	Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	0.05

Table 2: Summary of ecological values within 'Goulds Road onto Rudds Gully Road at Geraldton' survey area (continued)

Vegetation unit	Vegetation condition	Fauna habitat	Conservation significance	Area (ha)
E Single native *Eucalyptus* sp. with multiple stems all less than 30 cm DBH. Tree in good to poor condition due to historical lopping and strong winds with multiple branches lacking leaves. Understorey comprises non-native vegetation	Degraded	Tree	Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	<0.01
Non-native Predominantly non-native plants such as **Lycium ferocissimum, *Avena* sp., **Hyparrhenia hirta* and **Lupinus cosentinii*, **Echium plantagineum*	Completely degraded	Non-native grassland	Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	0.22

3.2. Rudds Gully Road onto Brand Highway at Geraldton

This survey area has been subject to historical disturbance and generally contains low value ecological features.

Vegetation unit **Ar** comprises scattered native shrubs but has low species diversity and a weedy ground layer. This vegetation is endemic and likely comprises shrubs which have naturally regenerated following disturbance. It is considered to represent native vegetation under the EP Act.

The remainder of the area comprises **non-native** vegetation, of which some will be removed for hardstand installation and trimming.

A summary of ecological values within this survey area is provided in **Table 3.** A photograph showing vegetation within this portion of the site is provided as **Plate 1**.

Ecological impacts in this survey area are expected to be low due to the high level of historical disturbance and type of proposed works (blade oversail).

Table 3: Summary of ecological values within 'Rudds Gully Road onto Brand Highway at Geraldton' survey area

Vegetation unit	Vegetation condition	Fauna habitat	Conservation significance	Area (ha)
Ar Scattered *Acacia rostellifera* tall shrubs over non-native shrub **Lycium ferocissimum* over non-native grasses and herbs	Degraded	Shrubland	Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	0.01
Non-native Predominantly non-native plants such as **Lycium ferocissimum, *Avena* sp., **Hyparrhenia hirta* and **Lupinus cosentinii*, **Echium plantagineum*	Completely degraded	Non-native grassland	Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	0.09



Plate 1: Native Acacia rostellifera shrubs over non-native Lycium ferocissimum shrubs and non-native grasses

3.3. Brand Highway at Dongara

This survey area has been subject to historical disturbance and generally contains low value ecological features.

Vegetation unit **Ec** comprises native trees over a weedy ground layer. These trees are endemic and assumed to represent native vegetation pursuant to the EP Act. Due to their location adjacent to and within a road verge, these trees may have been planted but there is insufficient evidence to support this given aerial imagery only extends back to 1998 (WALIA 2024). **Ec** lies within the proposed disturbance area and therefore multiple trees will be removed. Trees of the same species and of a similar size occur adjacent to the survey area.

The remainder of the area comprises **non-native** vegetation, of which some will be removed for hardstand installation or subject to trimming.

A summary of ecological values within this survey area is provided in **Table 4**. A photograph showing vegetation within this portion of the site is provided as **Plate 2**.

Table 4: Summary of ecological values within 'Brand Highway at Dongara' survey area

Vegetation unit	Vegetation condition	Fauna habitat	Conservation significance	Area (ha)
Ec *Eucalyptus camaldulensis* subsp. *arida* over dense cover of non-native grasses including **Cenchrus setaceus, *Avena sp.* with scattered non-native herbs **Fumaria capreolata*	Degraded	Woodland	Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	0.08

Table 4: Summary of ecological values within 'Brand Highway at Dongara' survey area (continued)

Vegetation unit	Vegetation condition	Fauna habitat	Conservation significance	Area (ha)
Non-native Predominantly non-native plants such as **Cenchrus setaceus, *Avena sp.* and **Eragrostis curvula* with scattered non-native herbs **Fumaria capreolata, *Oxalis pes-caprae*	Completely degraded	Non-native grassland	Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	0.19



Plate 2: Native Eucalyptus camaldulensis subsp. arida trees over non-native grasses

3.4. Brand Highway onto Cowalla Road at Badgingarra

This survey area comprises patches of intact native vegetation and patches of vegetation subject to ongoing disturbance from road maintenance.

This area is dominated by patches of native vegetation unit **EtBaBmBc** (refer **Table 3**). Where this vegetation is less disturbed it was mapped as being in 'very good' condition as it comprises scattered native trees over a diverse native shrub understorey layer. Portions mapped as being in 'good' and 'good – degraded' condition are closer to the road surface and have been subject to historical disturbance (clearing and/or ongoing mowing for road verge maintenance).

The **EtBaBmBc** vegetation provides suitable habitat for a range of threatened and priority flora species, as outlined in Emerge Associates (2024b). Targeted searches during the current survey did not record any threatened and priority flora species within this area. The survey was undertaken at an appropriate time of year (spring) and as such the majority of threatened and priority species with potential to occur should have been visible, if present. Therefore, it is considered unlikely that any threatened or priority flora species occur.

The **EtBaBmBc** vegetation provides primary native foraging habitat for threatened Carnaby's black cockatoo. The vegetation in 'good' and 'very good' condition is contiguous with similar or more intact vegetation and may provide habitat for a range of conservation significant fauna species (refer to Emerge Associates (2024a)).

The remainder of this area supports predominantly non-native vegetation, which includes scattered native plants. A summary of ecological values within this survey area is provided in **Table 5.** Representative photographs showing vegetation within this portion of the site are provided as **Plate 3** and **Plate 4**.

Ecological impacts are expected to include the following:

- Lopping of vegetation more than 3500 mm high within portion of **EtBaBmBc** east of Brand Highway (scattered native trees such as *Banksia menziesii*, *Hakea* spp. and *Nuytsia floribunda*).
- Removal of portion of **EtBaBmBc** on northern corner of Cowalla Road and Brand Highway (0.02 ha).
- Removal of scattered native plants for hardstand installation within portions of **predominantly non-native** vegetation unit (regrowth).

Table 5: Summary of ecological values within 'Brand Highway onto Cowalla Road at Badgingarra' survey area

Vegetation unit	Vegetation condition	Fauna habitat	Conservation significance	Area (ha)
EtBaBmBc Low open woodland *Eucalyptus todtiana*, *Banksia attenuata*, *Banksia menziesii*, *Banksia candolleana* and occasional *Banksia prionotes* and/or *Hakea obliqua* over open shrubland *Apectospermum spinescens*, *Adenanthos cygnorum* subsp. *cygnorum*, *Allocasuarina humilis* and *Callitris acuminata* over low shrubland *Eremaea* spp., *Hypocalymma xanthopetalum*, *Hibbertia hypericoides*, *Stirlingia latifolia* and *Conospermum* spp. over forb/rushland *Alexgeorgea subterranea*, *Alexgeorgea nitens*, *Chordifex sinuosus*, *Chordifex microdon*, *Mesomelaena pseudostygia* and *Lomandra* spp. over mixed native herbs and occasional weeds on sandy soils/sandplains.	Very good	Shrubland	Moderate -Habitat for conservation significant flora species but none recorded. -Habitat for conservation significant fauna species. -Primary native foraging habitat for Carnaby's black cockatoo. -Not a TEC or PEC.	0.22
	Good		Moderate -Habitat for conservation significant flora species but none recorded. -Habitat for conservation significant fauna species. -Primary native foraging habitat for Carnaby's black cockatoo. -Not a TEC or PEC.	0.06
	Good – degraded		Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	0.08
Predominantly non-native Predominantly non-native plants with scattered native shrubs and herbs and areas of bare ground	Completely degraded	Non-native grassland	Low – no habitat for conservation significant flora or fauna species, or TECs or PECs.	0.08



*Plate 3: Cowalla Road reserve facing east towards Brand Highway showing **predominantly non-native** vegetation close to road surface and vegetation unit **EtBaBmBc** on left side of image*



*Plate 4: Brand Highway reserve looking south at intersection showing Nuytsia floribunda tree within vegetation unit **EtBaBmBc** which is taller than 3500 mm and will require pruning*

4. CONCLUSIONS

The following three survey areas support low ecological values and proposed impacts are considered minor:

- Goulds Road onto Rudds Gully Road at Geraldton
- Rudds Gully Road onto Brand Highway at Geraldton
- Brand Highway at Dongara.

The following survey area contains a combination of patches of intact native vegetation, disturbed native vegetation and non-native vegetation:

- Brand Highway onto Cowalla Road at Badgingarra

Whilst some native vegetation is proposed to be removed within this area, the extent of impacts are low and no significant impacts to MNES or State-listed threatened and priority species are considered likely to occur.

5. REFERENCES

5.1. General references

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Emerge Associates 2024a, *Basic Fauna and Targeted Bird and Bat Assessment: Parron Wind Farm Development Support*, EP23-085(02)--004A AJU, Version A.

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Environmental Protection Authority (EPA) 2016, *Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment*, Perth.

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NVIS Technical Working Group 2017, *Australian Vegetation Attribute Manual: National Vegetation Information System*, Department of the Environment and Energy, Canberra.

Rex J Andrews Engineered Transportation 2024, *Route Study Geraldton Port to Parron WF*, Version 0.

Western Australian Land Information Authority (WALIA) 2024, *Landgate Map Viewer Plus*, <https://map-viewer-plus.app.landgate.wa.gov.au/index.html>.

Western Australian Herbarium 2024, *Florabase*, Department of Biodiveristy, Conservation and Attractions (DBCA), <https://florabase.dbca.wa.gov.au/>.

5.2. Online references

Western Australian Herbarium (2018). *FloraBase—the Western Australian Flora.* Department of Biodiversity, Conservation and Attractions. <https://florabase.dpaw.wa.gov.au>

Figures

Figure 1: Site Location

Figure 2: Vegetation Units

Figure 3: Vegetation Condition

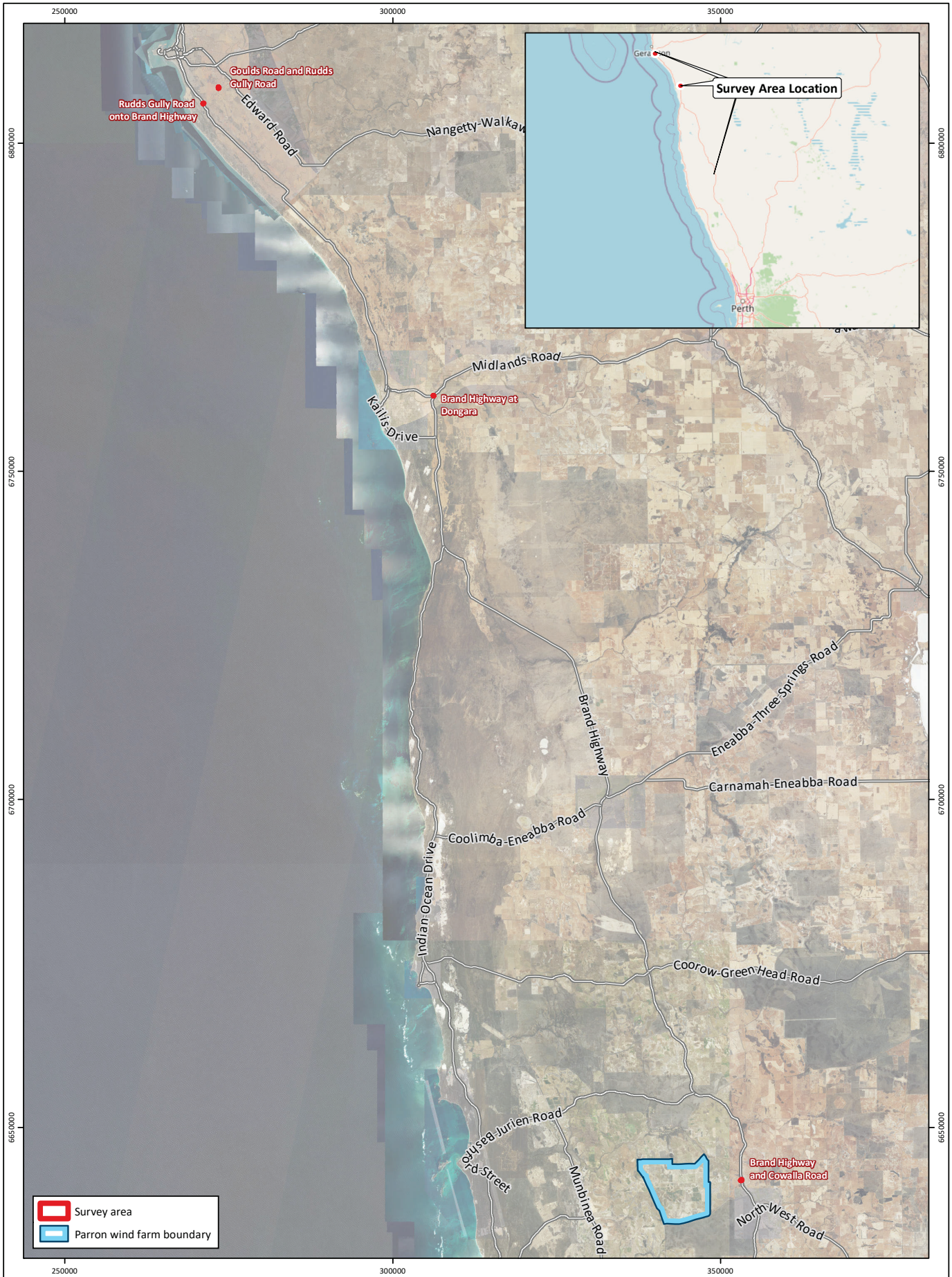


Figure 1: Survey Area Location - Overview

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F153a

Drawn:	GAR
Date:	21/05/2025
Checked:	RAW
Approved:	RAW
Date:	21/05/2025

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Scale: 1:750,000@A4

GDA 1994 MGA Zone 50

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Figure 1: **Site Location - Rudds Gully Road onto Brand Highway**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F154a

Drawn:	WJC
Date:	28/07/2026
Checked:	LRF
Approved:	RAW
Date:	31/07/2026

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Scale: 1:600@A4

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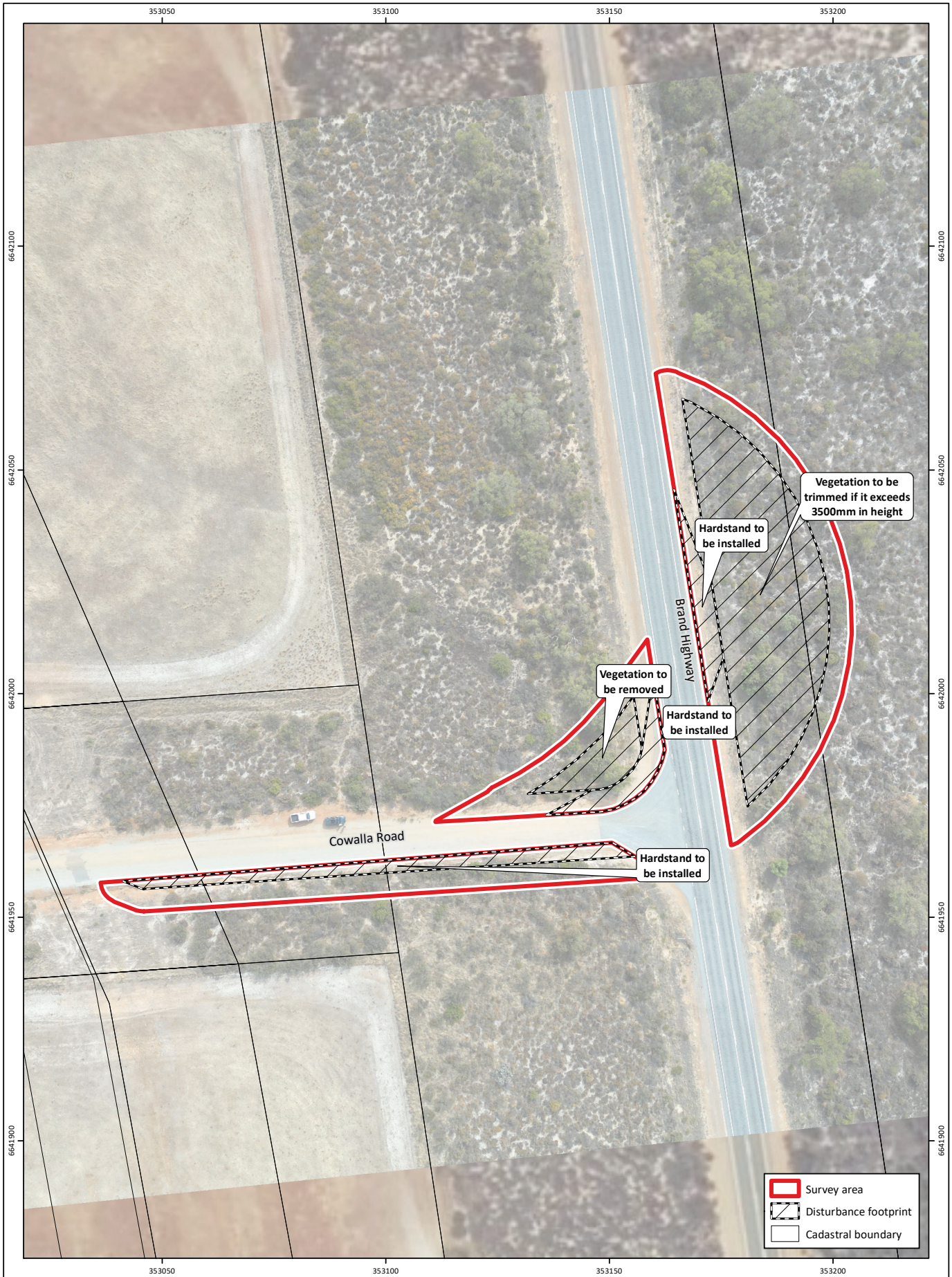


Figure 1: **Site Location - Brand Highway and Cowalla Road**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F154a

Drawn:	WJC
Date:	28/07/2026
Checked:	LRF
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Date:	31/07/2026

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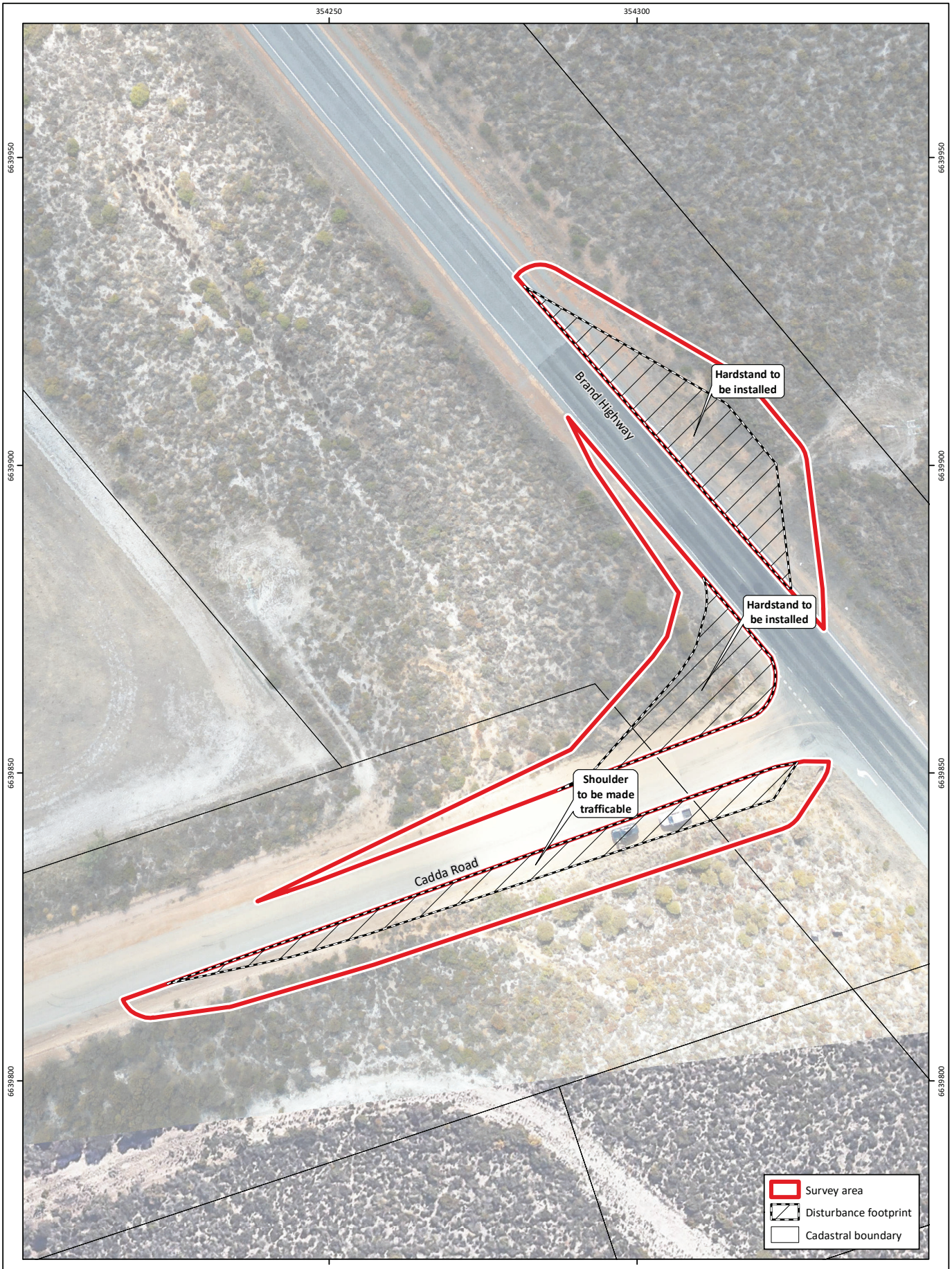


Figure 1: **Site Location - Brand Highway at Cadda Road**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F154a
Drawn: WJC
Date: 28/07/2026
Checked: LRF
Approved: RAW
Date: 31/07/2026

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GDA2020 MGA Zone 50

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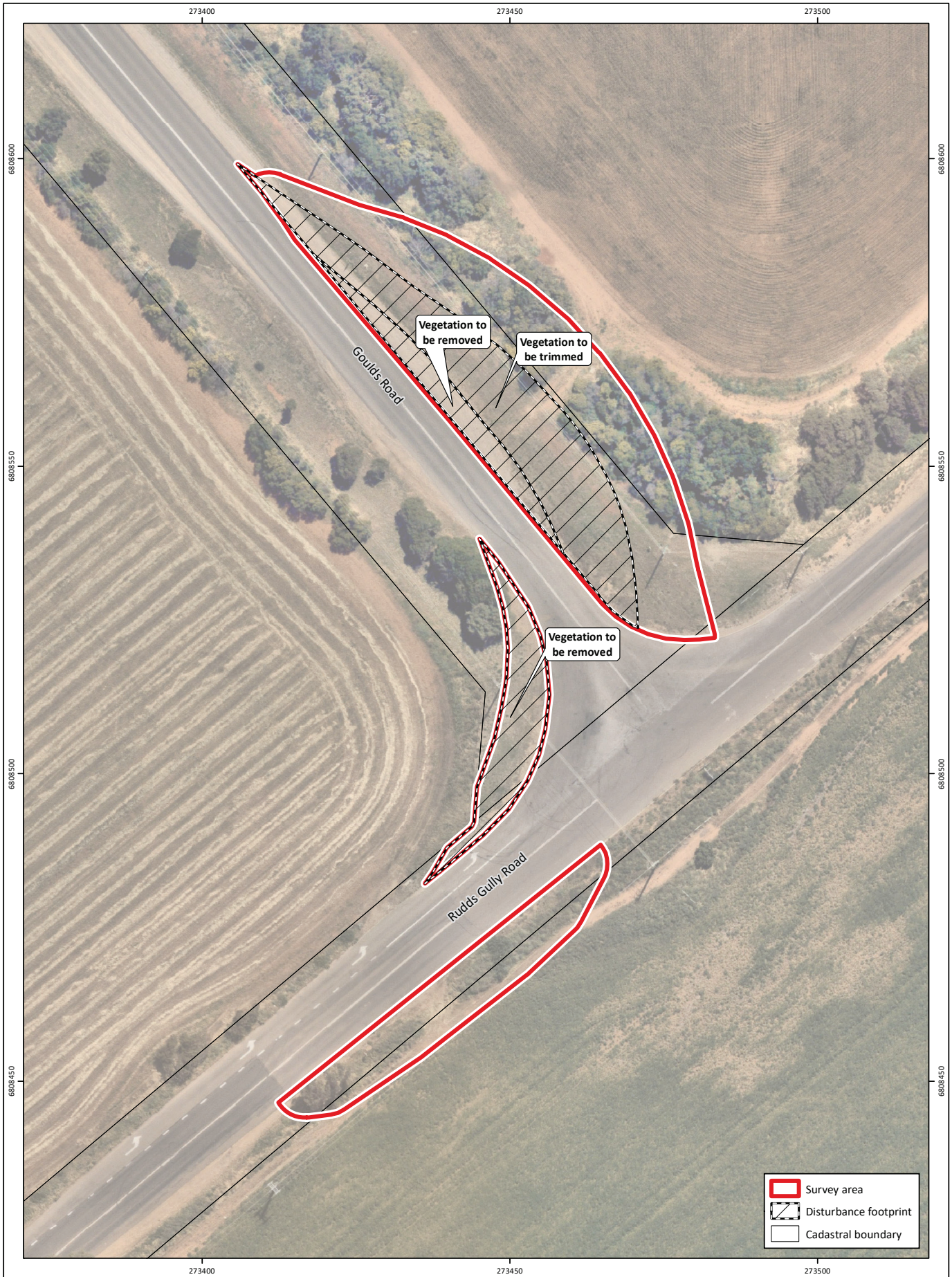


Figure 1: **Site Location - Goulds Road and Rudds Gully Road**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: **EP23-085(20)--F154a**
Drawn: WJC
Date: 28/07/2026
Checked: LRF
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Date: 31/07/2026

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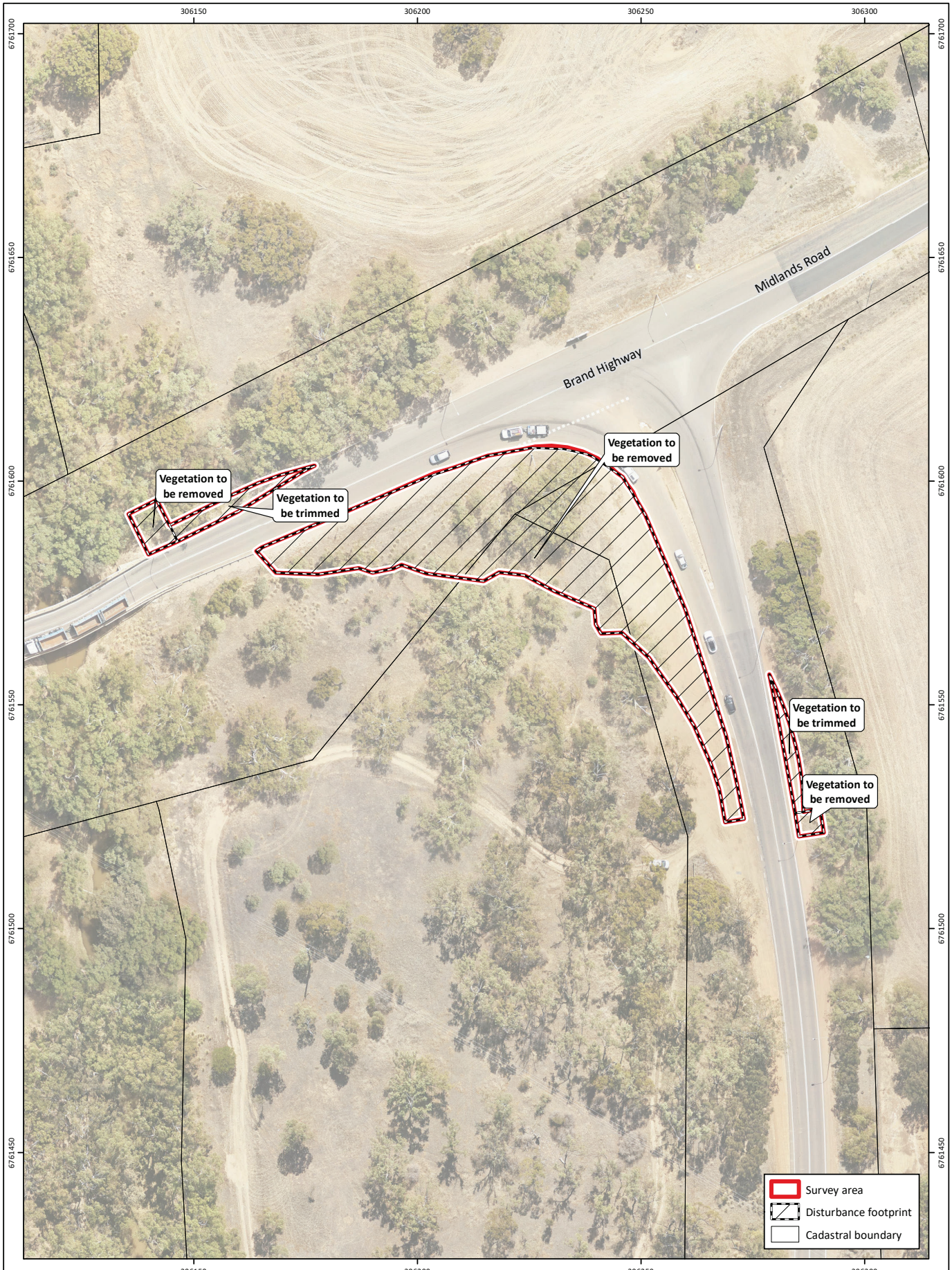


Figure 1: **Site Location - Brand Highway at Dongara**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F154a

Drawn:	WJC
Date:	28/07/2026
Checked:	LRF
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Figure 2: **Vegetation Units - Rudds Gully Road onto Brand Highway**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F155a
Drawn: WJC
Date: 28/07/2026
Checked: LRF
Approved: RAW
Date: 31/07/2026

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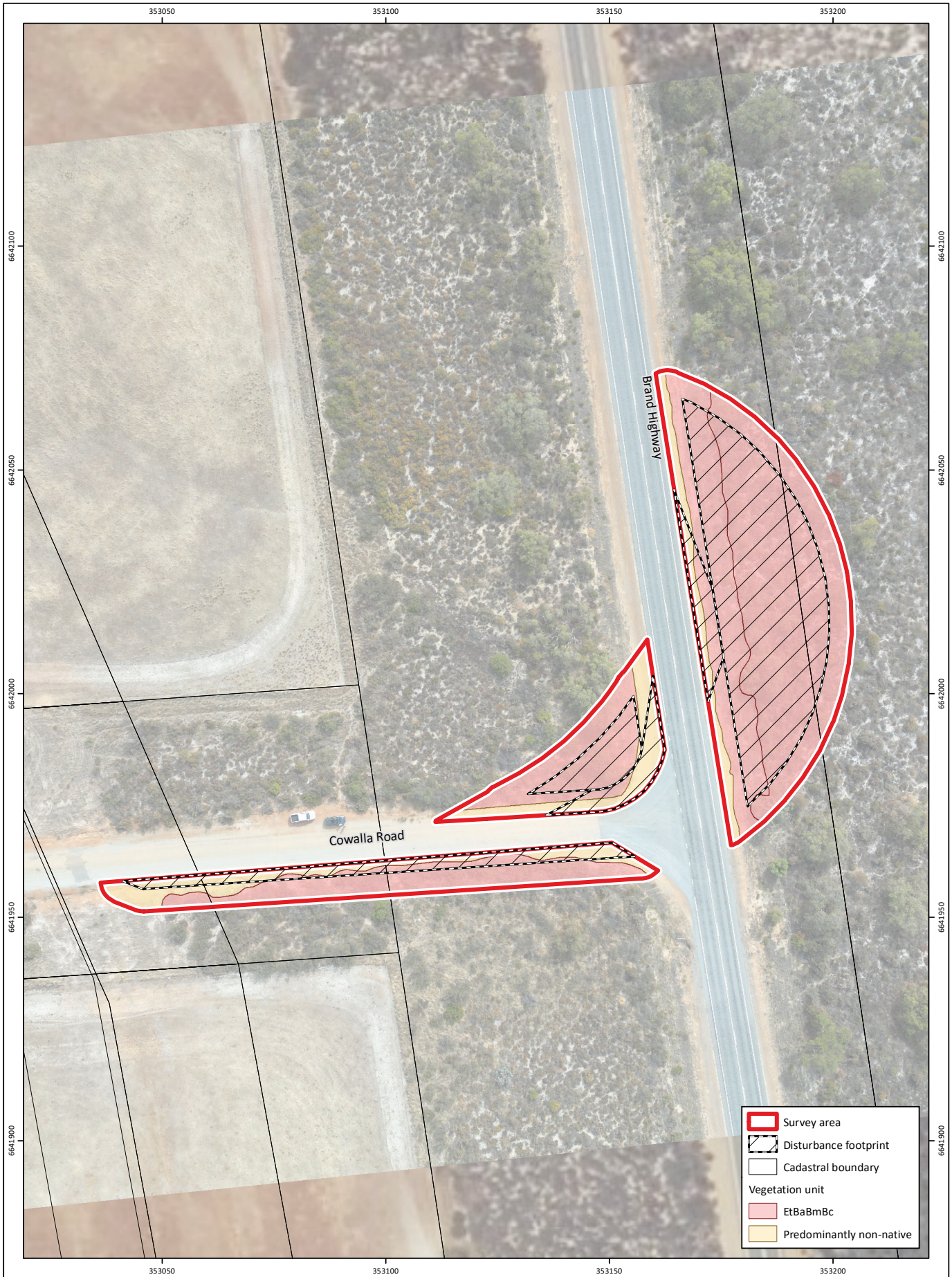


Figure 2: **Vegetation Units - Brand Highway and Cowalla Road**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F155a
Drawn: WJC
Date: 28/07/2026
Checked: LRF
Approved: RAW
Date: 31/07/2026

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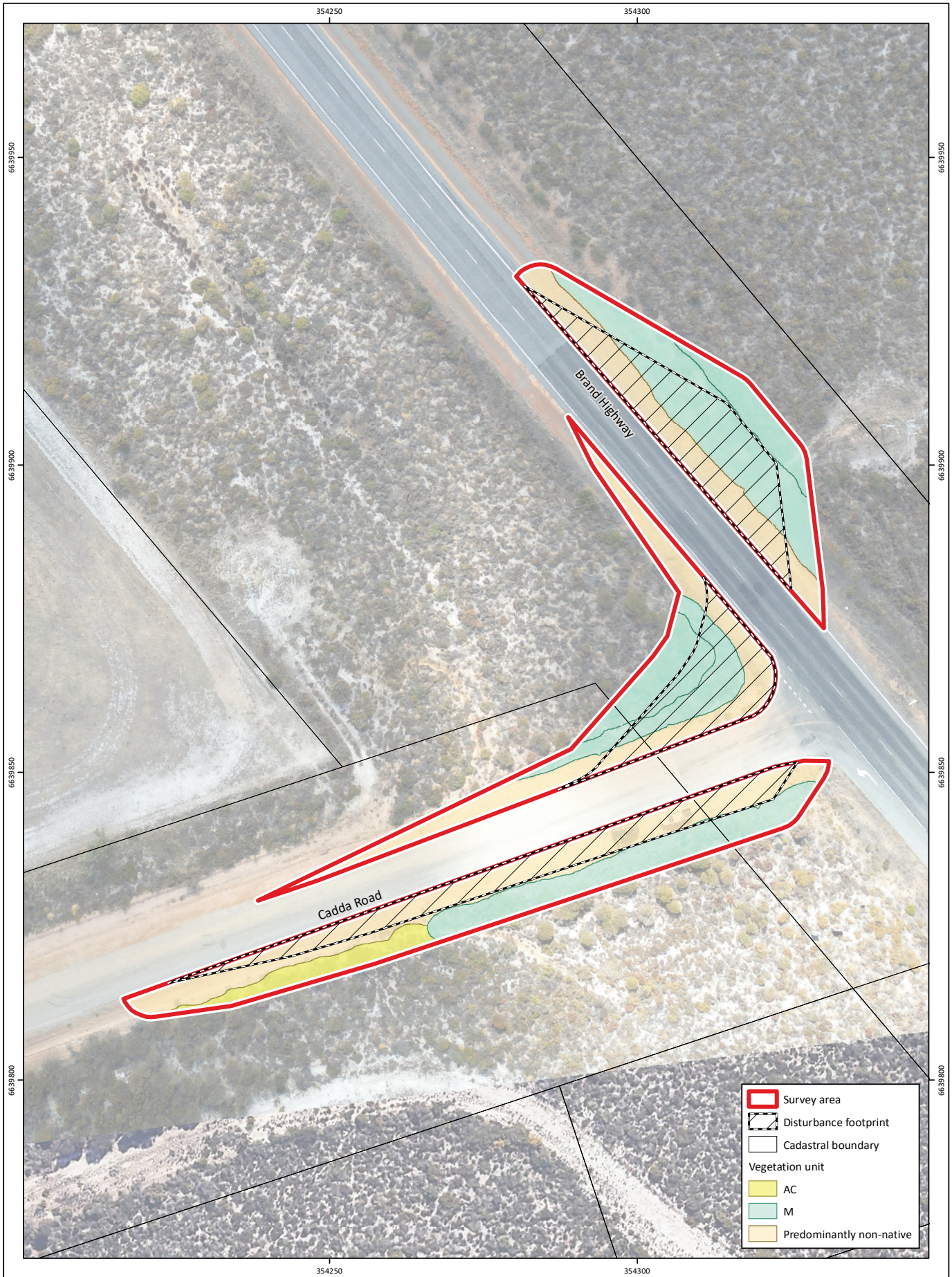


Figure 2: **Vegetation Units - Brand Highway at Cadda Road**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F155a
Drawn: WJC
Date: 28/07/2026
Checked: LRF
Approved: RAW
Date: 31/07/2026

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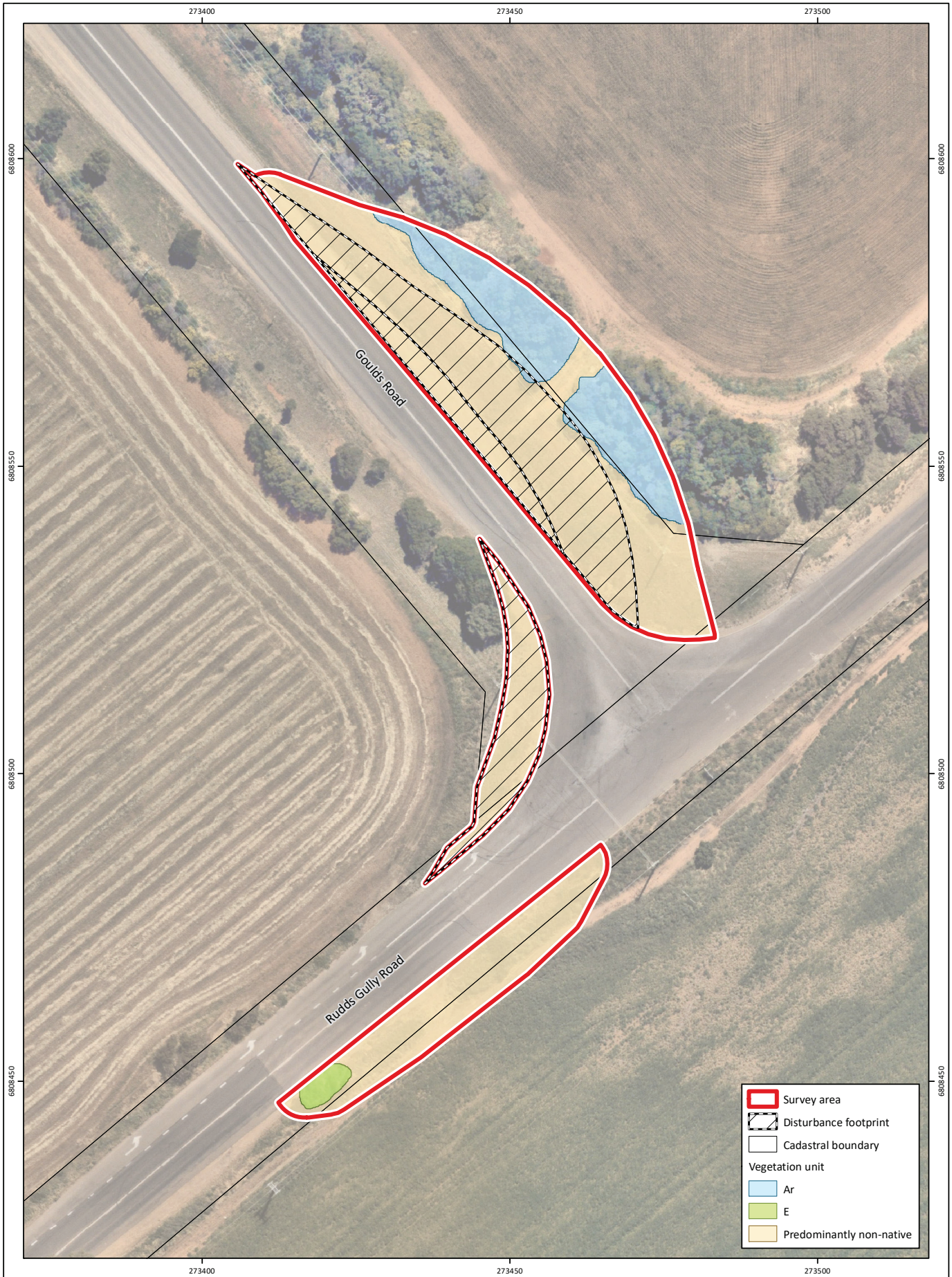


Figure 2: **Vegetation Units - Goulds Road and Rudds Gully Road**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F155a
Drawn: WJC
Date: 28/07/2026
Checked: LRF
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Date: 31/07/2026

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Figure 2: **Vegetation Units - Brand Highway at Dongara**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F155a

Drawn:	WJC
Date:	28/07/2026
Checked:	LRF
Approved:	RAW
Date:	31/07/2026

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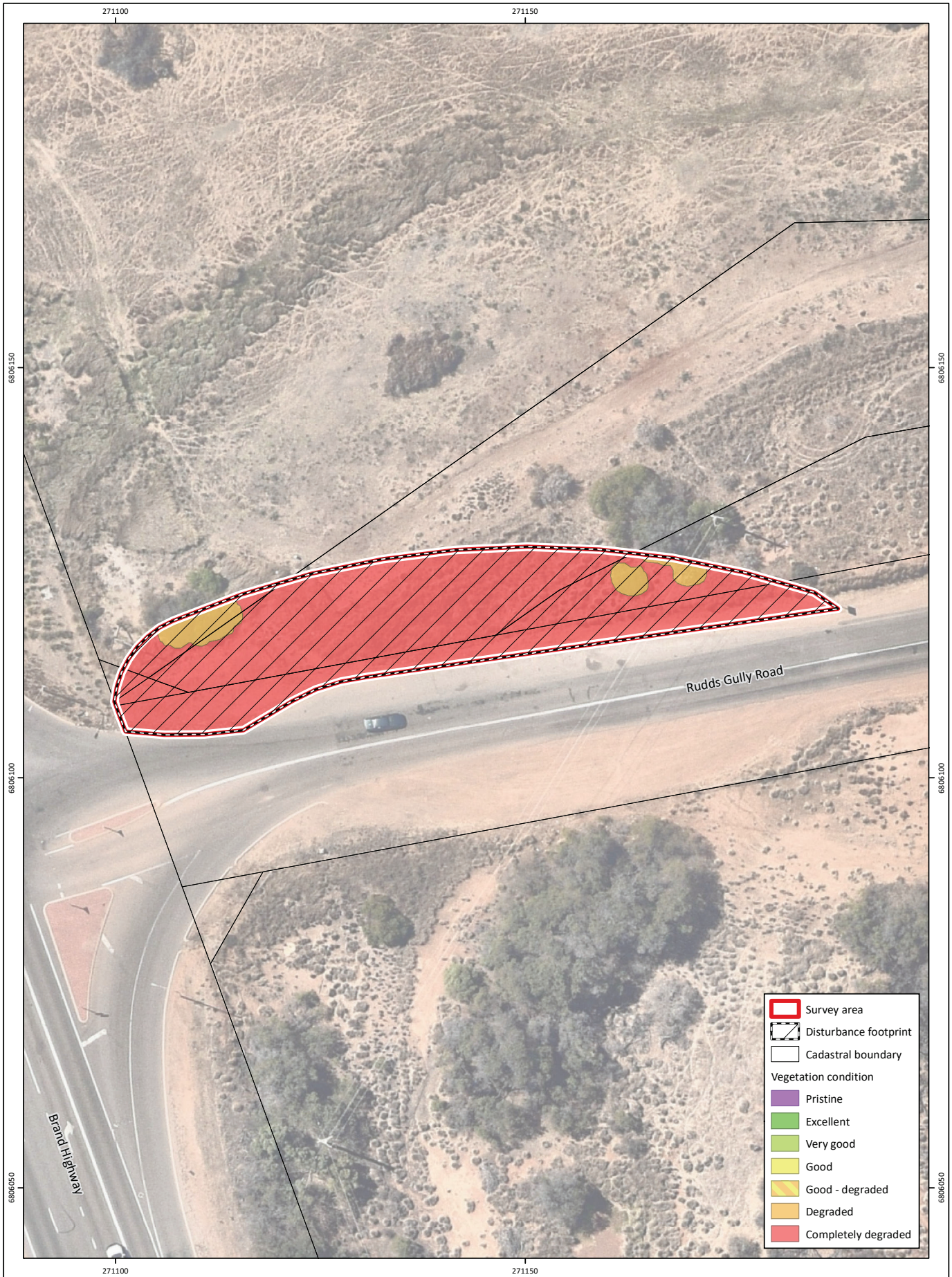


Figure 3: **Vegetation Condition - Rudds Gully Road onto Brand Highway**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F156a
Drawn: WJC
Date: 28/07/2026
Checked: LRF
Approved: RAW
Date: 31/07/2026

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Scale: 1:600@A4

GDA2020 MGA Zone 50

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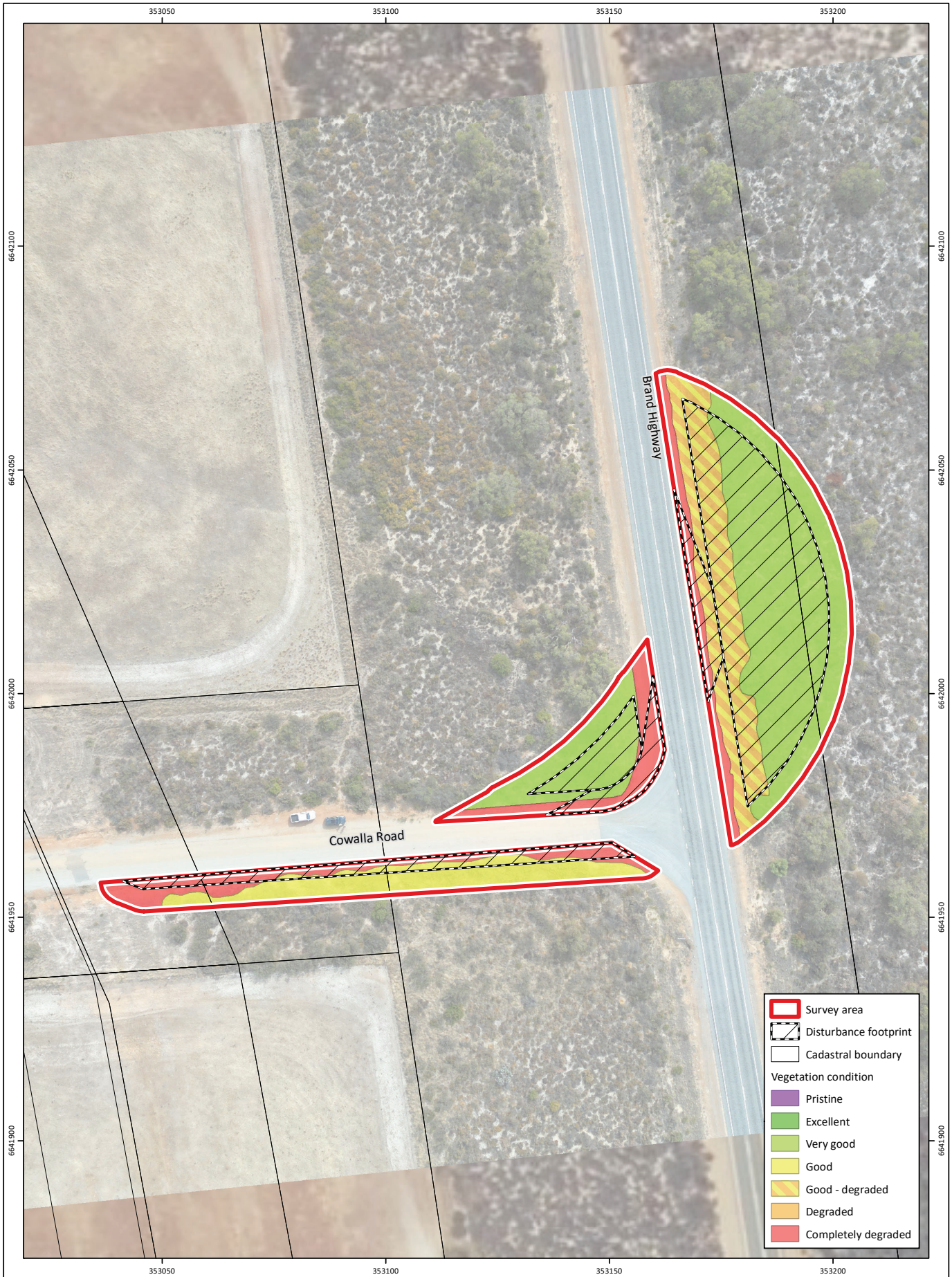


Figure 3: **Vegetation Condition - Brand Highway and Cowalla Road**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F156a
Drawn: WJC
Date: 28/07/2026
Checked: LRF
Approved: RAW
Date: 31/07/2026

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Scale: 1:1,100@A4

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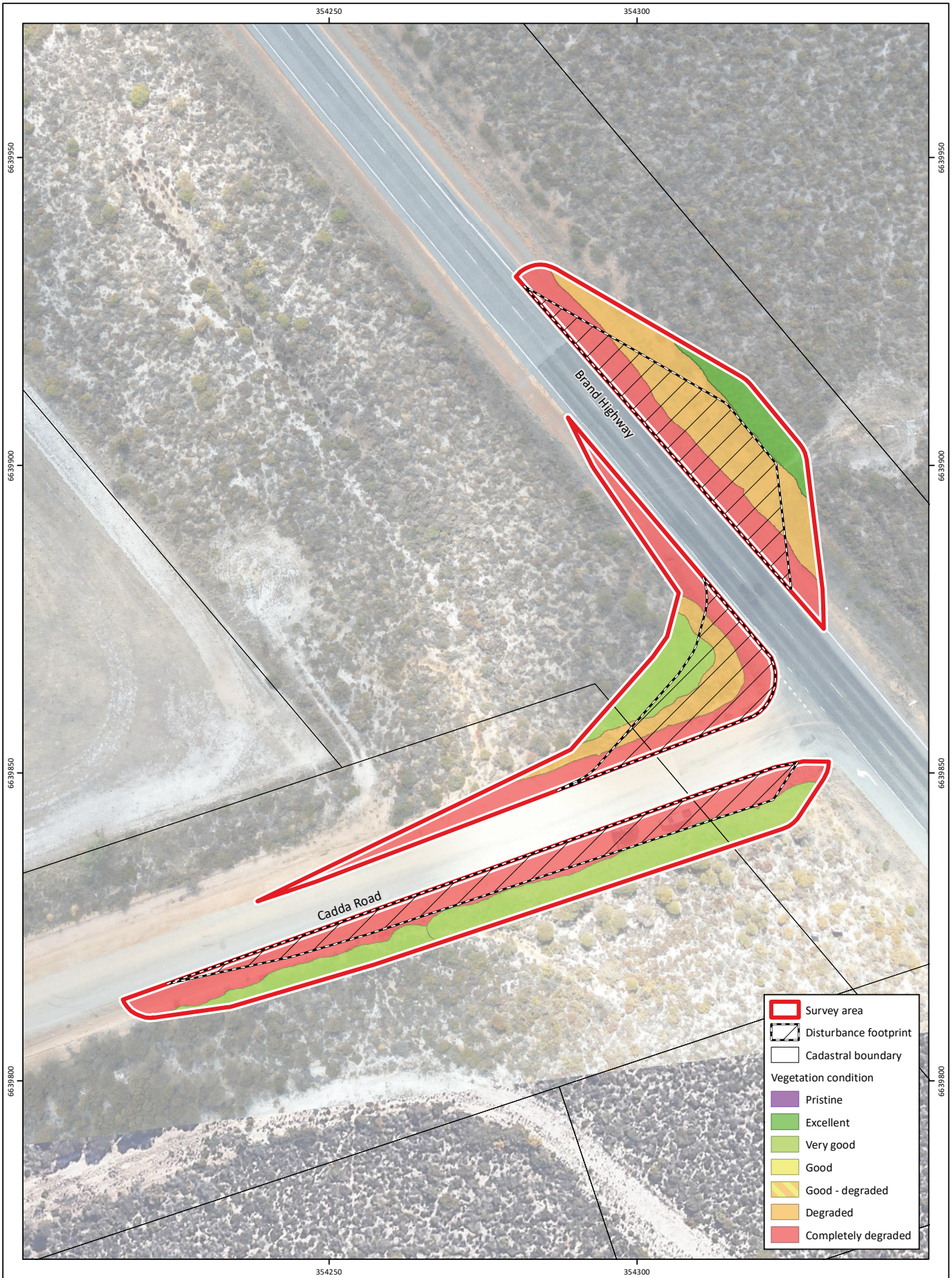


Figure 3: **Vegetation Condition - Brand Highway at Cadda Road**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F156a
Drawn: WJC
Date: 28/07/2026
Checked: LRF
Approved: RAW
Date: 31/07/2026

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Scale: 1:800@A4

GDA2020 MGA Zone 50

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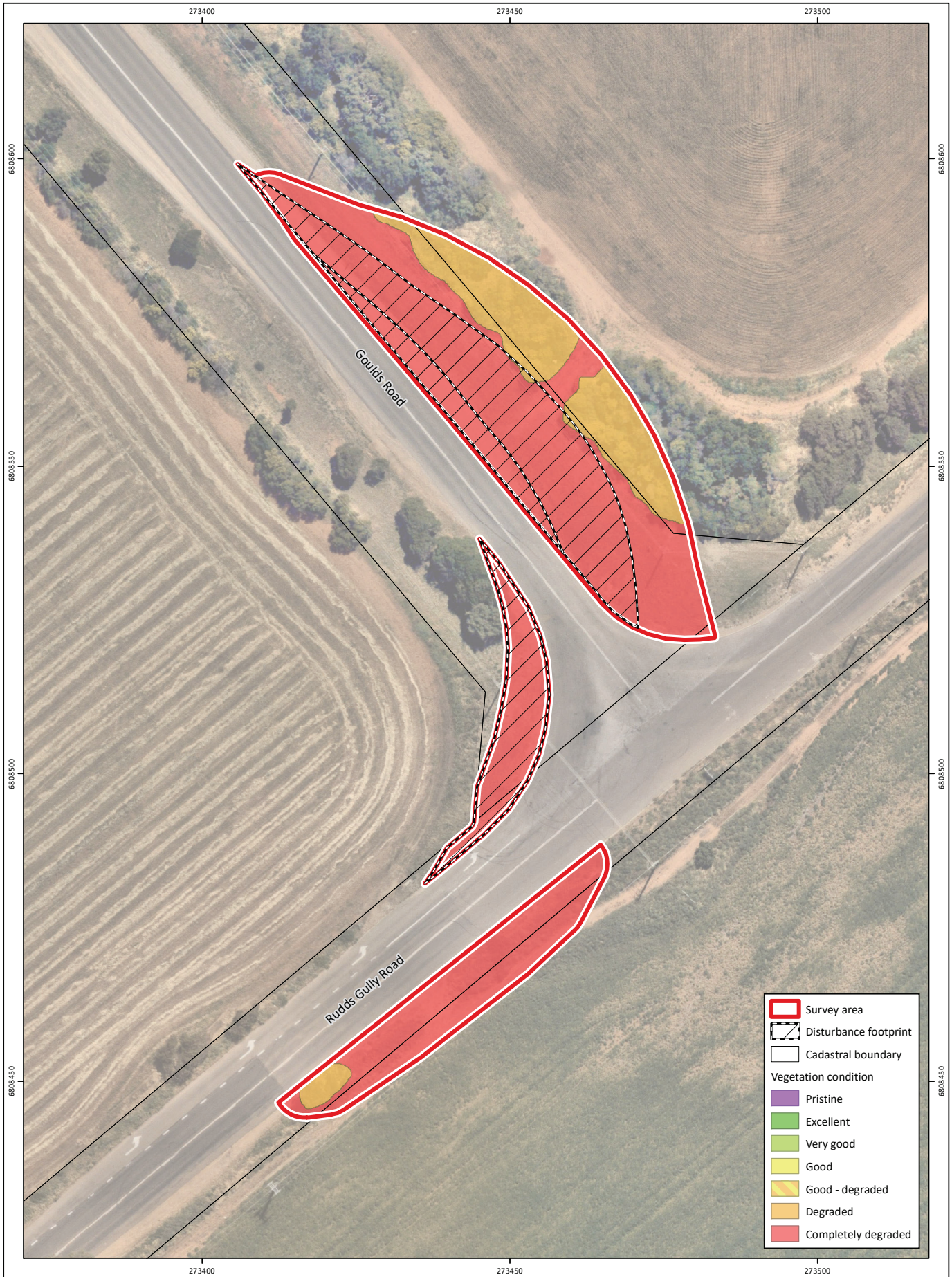


Figure 3: **Vegetation Condition - Goulds Road and Rudds Gully Road**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F156a
Drawn: WJC
Date: 28/07/2026
Checked: LRF
Approved: RAW
Date: 31/07/2026

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Metres

Scale: 1:800@A4

GDA2020 MGA Zone 50

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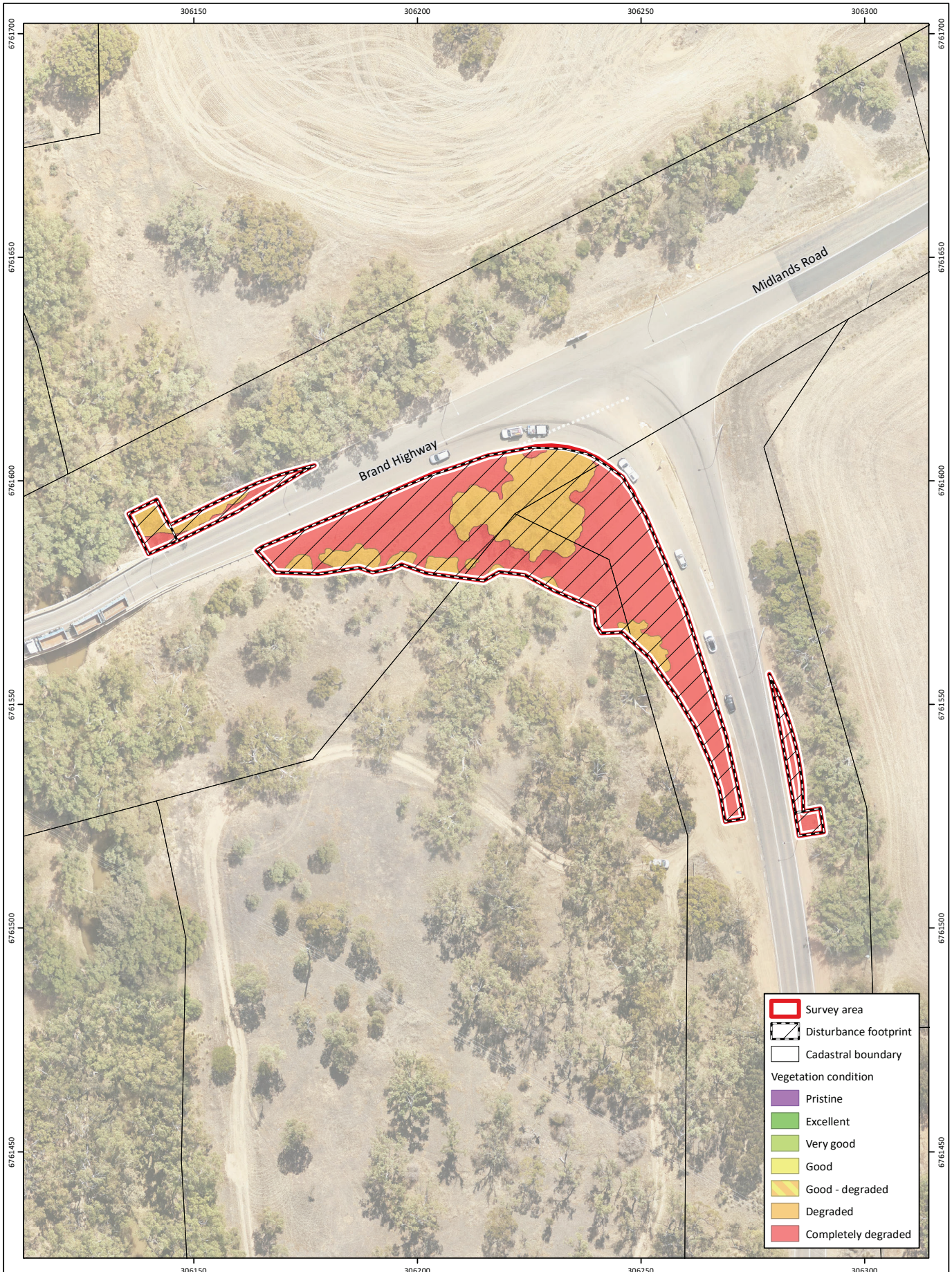


Figure 3: **Vegetation Condition - Brand Highway at Dongara**

Project: Transport Corridor Ecology Assessment
Parron Wind Farm

Client: Zephyr Energy Pty Ltd

Plan Number: EP23-085(20)--F156a
Drawn: WJC
Date: 28/07/2026
Checked: LRF
Approved: RAW
Date: 31/07/2026

N

0 10 20
Metres

Scale: 1:1,100@A4

GDA2020 MGA Zone 50

emerge ASSOCIATES

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