

Prime Eglinton Pty Ltd  
Annual Compliance Report (EPBC 2017/7872)

19 (Lot 6) Taronga Place, Eglinton  
16 December 2019

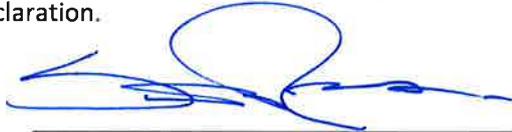
56901-123658 (Rev 0)

JBS&G Australia Pty Ltd T/A Strategen-JBS&G

Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed



Full name (please print)

SMART RESIDE

Position (please print)

GENERAL MANAGER, URBAN QUARTER.

Organisation (please print including ABN/ACN if applicable)

URBAN QUARTER

Date

13 / 12 / 2019

600 858 160

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## 1. Introduction

This report addresses the status and compliance of implementation of Prime Eglinton Pty Ltd (Prime Eglinton) with the conditions in *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval decision notice 2017/7872 (EPBC 2017/7872) for the development of 19 (Lot 6) Taronga Place, Eglinton for residential and commercial land use. This report has been prepared for the purpose of addressing condition 8 of EPBC 2017/7872, which requires the proponent to publish annual compliance reports.

### 1.1 Project background

Prime Eglinton is developing Lot 6 Taronga Place in Eglinton, Western Australia (the development) for residential and commercial use. The development involves clearing of approximately 120 ha of vegetation comprising approximately 92.25 ha of Carnaby's Black Cockatoo (*Calyptorhynchus latirostris*, [CBC]) habitat and 41.29 ha of Banksia Woodland Threatened Ecological Community (TEC) which are listed as Endangered species and habitat, respectively, under the EPBC Act.

The development includes the retention of at least 8 hectares (ha) of CBC habitat and Banksia Woodland TEC, to be retained in Conservation Public Open Space (POS) areas.

### 1.2 Environmental approval to implement project

The action was referred to the Department of the Environment and Energy (DEE) on 30 January 2017 and was deemed a 'controlled action' under the EPBC Act on 3 April 2017, to be assessed by preliminary documentation. The action was conditionally approved on 18 September 2018 under EPBC 2017/7872.

In accordance with condition 4 of EPBC 2017/7872, Prime Eglinton is required to prepare and implement a Vegetation and Conservation Area Management Plan (VCAMP) to prevent impacts to retained areas of CBC habitat and Banksia Woodland TEC during construction. Revision 1 of the VCAMP was submitted to DEE on 2 October 2018 and subsequently approved on 3 October 2018.

The development commenced on 8 October 2018.

## 2. Current Status

Activities undertaken during the audit period (8 October 2018 – 7 October 2019) involved the following:

- clearing of approximately 8 ha as part of Stage 1 and associated civil and bulk earthworks
- purchase of offset properties
- construction of sales office and associated landscaping.

### 3. Audit methodology

#### 3.1 Audit plan

##### 3.1.1 Purpose and scope

This document has been prepared for Prime Eglinton (the proponent) to fulfil the requirements of condition 8 of EPBC 2017/7872 issued to enable implementation of the YGE development. Condition 8 states:

*‘Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published. Reports must remain on the website for the life of this approval. The approval holder must continue to comply with this condition until such time as agreed to in writing by the Minister. ‘*

This Annual Compliance Report (ACR) addresses the audit period between 8 October 2018 and 7 October 2019. The ACR addresses each condition of approval. Key management actions of the Project Vegetation and Conservation Area Management Plan (VCAMP) were also assessed to determine if the plan has been satisfactorily implemented as required by condition 4.

##### 3.1.2 Methodology

The audit was undertaken in September and October 2019 and involved a site inspection (26 September 2019), interviews with key members of the project team and a review of documentation to support the audit.

Table 3.1 provides an overview of the personnel consulted as part of the audit.

**Table 3.1: Persons consulted during the audit**

Organisation	Person and position	Purpose
Urban Quarter	Stuart Reside – General Manager, Urban Quarter	To provide an overview of activities undertaken on site during the audit period and to obtain verifiable evidence to assess implementation and performance of EPBC 2017/7872 and the VCAMP.
Strategen – JBS&G	Chris Lehman – Consultant	

#### 3.2 Audit terminology

The ‘Status’ field of the audit table (refer to Table 4.1; Table A.1) describes the implementation of actions and compliance with the approval. Terminology from the DEE (the then Department of the Environment, DotE [2014]) Annual Compliance Report Guidelines was adapted and applied in this audit (Table 3.2)

**Table 3.2: Action implementation status**

Status	Acronym	Description
<b>Conditions of approval</b>		
Compliant	C	All the requirements of a condition have been met, including the implementation of management plans or other measures required by condition.
Potentially non-compliant	PNC	The requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not applicable	N/A	The requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.
<b>Management Plans</b>		
Conformant	C	All the requirements of a key management action detailed within a subsidiary plan or program have been satisfactorily met.

Potentially non-conformant	PNC	All the requirements of a key management actions detailed within a subsidiary plan or program have not been met satisfactorily.
Not applicable	N/A	The requirements of a management action fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.

## **4. Audit results**

The results of compliance of EPBC 2017/7872 are shown in Table 4.1. Condition 4 requires the preparation and implementation of the approved VCAMP. The results of conformance with the management actions contained within the VCAMP are outlined in Appendix A.

### **4.1 Compliance with conditions of EPBC 2017/7872**

The audit addressed 15 sub-conditions of which:

- four conditions were assessed as 'compliant'
- two conditions were 'compliant (complete)'
- one condition was 'potentially non-compliant'
- eight conditions were 'not applicable' during this audit period.

### **4.2 Compliance with VCAMP**

The audit addressed 40 actions of the VCAMP, of which:

- 27 actions actions were assessed as 'conformant'
- 12 actions were assessed as 'not applicable' during this audit period.

**Table 4.1: EPBC 2017/7872 Audit Table**

Condition number	Condition	Timing	Evidence	Comments	Compliance status
EPBC 1.1	The approval holder must not clear more than 92.25 hectares of Carnaby's Black Cockatoo habitat or 41.29 hectares of Banksia Woodlands TEC within the project area shown at Attachment 1.	Ongoing.	D_001_Strategen-JBSG_Total Stage 1 Clearing_07102019  G_001_Cossill & Webley_Clearing Plan_19082018  Site inspection 26 <sup>th</sup> September 2019	A total of 8.12 hectares (ha) was cleared as part Stage 1, comprising both CBC habitat (7.76 ha) and Banksia TEC (4.6 ha) (D_001).  The extent of clearing was confirmed to be within the EPBC boundary during the site inspection and upon review of clearing plan (G_001).	Compliant
EPBC 2.1	Within 7 days prior to clearing of any area of Carnaby's Black Cockatoo habitat, the approval holder must investigate and document all potential nesting trees within the area to be cleared to determine if there are any hollows that are being utilised, or are capable of being utilised, by the Carnaby's Black Cockatoos for nesting. The investigation must be undertaken by a suitably qualified person.	Within 7 days prior to clearing of any area of Carnaby's Black Cockatoo habitat.	C_001_Strategen-JBSG_EPBC 2017_7872-Notificaiton of Clearing_18102018  C_002_RFirth_VCAMP and Black Cockatoo breeding Eglinton for Urban Quarter_05102018  R_001_Strategen-JBSG_Fauna Relocation Report_09102018  C_006_Strategen-JBSG_Trees with hollows for cockatoos_06092018	Clearing for Stage 1 of the development commenced on 8 October 2018 (C_001), during the Carnaby's Black Cockatoo breeding season.  In email correspondence provided on 5 October 2018, Strategen-JBS&G zoologist Ron Firth confirmed that during the fauna relocation programme, which occurred between 1-4 October (R_001), a habitat tree assessment was conducted. The assessment identified no breeding trees or potential breeding habitat within the Stage 1 site (C_002). Additionally, in advice provided by Strategen-JBS&G it was noted that only two trees with hollows are present within the development site (C_006). These trees are located to the east of the Freeway reserve and will not be disturbed until later stages of the development.	Compliant
EPBC 2.2	a. If any Carnaby's Black Cockatoo(s) is detected utilising any hollow in any tree, the approval holder must: i. clearly identify and mark the nesting tree ii. maintain a register of nesting trees iii. only clear the identified nesting tree and vegetation within a 10-metre radius of that tree, if a suitably qualified person has verified that the hollow in the tree is no longer being used by the Carnaby's Black Cockatoo.	Within 7 days prior to clearing of any area of Carnaby's Black Cockatoo habitat.	Refer to EPBC 2.1	Refer to EPBC 2.1	N/A
EPBC 2.3	b. For each cleared hollow that is being utilised, or capable of being utilised by the Carnaby's Black Cockatoo, the proponent must install at least three (3) artificial nesting hollows, where the artificial nesting hollows must be: i. installed within a 12 km radius of the cleared nesting tree(s) ii. constructed, positioned, erected and maintained in accordance with relevant artificial hollow guidance, to maximise the likelihood that the artificial nesting hollows are utilised by the Carnaby's Black Cockatoo iii. installed before the commencement of the following breeding season for the Carnaby's Black Cockatoo iv. inspected and maintained at least annually to check for condition and evidence of Carnaby's Black Cockatoo use.	Within 7 days prior to clearing of any area of Carnaby's Black Cockatoo habitat.	Refer to EPBC 2.1	Refer to EPBC 2.1	N/A
EPBC 3.1	To minimise impacts to the Carnaby's Black Cockatoo and the Banksia Woodlands TEC, the approval holder must, within 5 years of commencement of the action, provide the Department with written evidence that at least 8 hectares of Carnaby's Black Cockatoo habitat and Banksia Woodlands TEC has been transferred to the City of Wanneroo as Public Open Space for the purposes of conservation.	Within 5 years of commencement of the action.	Urban Quarter advice 26 September 2019	Prime Eglinton has until 8 October 2023 to transfer at least 8 ha of Carnaby's Black Cockatoo habitat and Banksia Woodlands TEC to the City of Wanneroo as Public Open Space for the purpose of conservation.  Urban Quarter advised that this had not yet been undertaken.	N/A
EPBC 4.1	To mitigate impacts to the Carnaby's Black Cockatoo and the Banksia Woodlands TEC, the approval holder must prepare and submit a Vegetation and Conservation Area Management Plan (VCAMP) for the approval of the Minister. The approval holder must not commence the action unless the Minister has approved the VCAMP. The approved VCAMP must be implemented.  The VCAMP must be prepared in accordance with the Department's Environmental Management Plan Guidelines and include, but not be limited to: a. measures to prevent impacts to Carnaby's Black Cockatoo habitat and Banksia Woodlands TEC during construction, including to:	Prior to commencement of action.	C_003_DEE_VCAMP approval 03102018  R_002_Strategen-JBSG_VCAMP Rev 1_02102018	The VCAMP was submitted to DEE on the 2 October 2018 (R_002) and was approved on 3 October 2018 (C_003).  The key actions of the VCAMP were assessed during this audit period and it was found that of the 40 key actions identified within the VCAMP: <ul style="list-style-type: none"><li>• 27 were assessed as conformant</li><li>• 12 were not applicable during the audit period.</li></ul> Refer to Appendix A for further detail regarding implementation.	Compliant

Condition number	Condition	Timing	Evidence	Comments	Compliance status
	<ul style="list-style-type: none"> <li>i. prevent and/or control site access, weeds, Phytophthora dieback, erosion, dust and fire</li> <li>ii. delineate vegetation to be retained through, for example, the erection of temporary fencing or signage to avoid accidental clearing or disturbance outside of the impact area</li> <li>b. objectives, targets and completion criteria for post construction rehabilitation measures such as site clean-up and weed management, including information on the mapping, monitoring and removal of noxious weeds</li> <li>c. access control measures (e.g. fencing) to prevent or manage access to the areas of Public Open Space proposed to be retained for conservation</li> <li>d. bushfire control measures</li> <li>e. design and engineering controls to ensure that stormwater is not directed toward retained and adjacent areas of vegetation and that stormwater is appropriately managed to reduce hydrological impacts and prevent the mobilisation of dieback or other contaminants</li> <li>f. clear objectives and performance indicators for all management actions, mitigation measures and practices prescribed by the VCAMP including details of the monitoring to be undertaken to demonstrate the effectiveness of the measures</li> <li>g. corrective actions for circumstances where an action, mitigation measure or practice prescribed by the VCAMP fails to meet, or is unlikely to meet, its prescribed objective, and trigger action points at which these corrective actions will be implemented</li> <li>h. timeframes for implementing the above measures.</li> </ul>			There were no potential non-conformances identified during the VCAMP assessment and therefore the auditors conclude that the plan has been implemented satisfactorily.	
EPBC 5.1	<p>To compensate for the loss of up to 92.25 hectares of Carnaby's Black Cockatoo habitat and 41.29 hectares of Banksia Woodlands TEC the approval holder must, within one year after the commencement of the action provide the Department with:</p> <ul style="list-style-type: none"> <li>a. written evidence that <ul style="list-style-type: none"> <li>i. 380 hectares of land at Lot 5450 Wannamal Road West, Boonarring</li> <li>ii. 117 hectares of Carnaby's Black Cockatoo habitat and Banksia Woodlands TEC at Lot 3333 Mimegarra Road, Cataby</li> </ul> </li> </ul> <p>have both been purchased and are being managed for conservation by the DBCA, using monies provided by the proponent for that purpose.</p> <ul style="list-style-type: none"> <li>b. the offset attributes, shapefiles and textual descriptions and maps to clearly define the location and boundaries of the offset areas, that the approval holder has transferred to the DBCA.</li> </ul>	Within one year after the commencement of the action.	C_008_Strategen-JBS&G_Notification to DEE Offset Purchase_04102019	<p>Strategen-JBS&amp;G, on behalf of Prime Eglinton, notified the DEE on 4 October 2019 (C_008), within one year of commencement of the action (8 October 2018, refer to EPBC 6.1), that funds had been transferred to the Department of Biodiversity, Conservation and Attractions (DBCA) for the acquisition and management of two offset sites:</p> <ul style="list-style-type: none"> <li>• 380 hectares of land at Lot 5450 Wannamal Road West, Boonarring</li> <li>• 117 hectares of Carnaby's Black Cockatoo habitat and Banksia Woodlands TEC at Lot 3333 Mimegarra Road, Cataby.</li> </ul> <p>A copy of the tax receipt, shapefiles, maps and attributes of both offset sites were also provided (C_003).</p>	Compliant (Complete)
EPBC 6.1	Within 30 days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.	Within 30 days after the commencement of the action.	C_001_Strategen-JBSG_EPBC 2017_2872-Notification of Clearing_18102018	The action commenced on 8 October 2018 and DEE were notified within 30 days on the 18 October 2018 (C_001).	Compliant (Complete)
EPBC 7.1	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the VCAMP required by this approval (Condition 4), and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be published in the general media.	Ongoing	All evidence utilised to inform this ACR.	Accurate records for all applicable conditions have been maintained and were available at the time of the audit and following the audit (refer to the other items in this tables and Appendix A).	Compliant
EPBC 8.1	Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to	Within three months of every 12-month anniversary of the	C_001_Strategen-JBSG_EPBC 2017_2872-Notification of Clearing_18102018	The action commenced on the 8 October 2018 (C_001). This report is the first Annual Compliance Report that is due for publication on 8 January 2019. This item will therefore be assessed in the next audit period.	N/A

Condition number	Condition	Timing	Evidence	Comments	Compliance status
	the Department at the same time as the compliance report is published. Reports must remain on the website for the life of this approval. The approval holder must continue to comply with this condition until such time as agreed to in writing by the Minister.	commencement of the action.			
EPBC 9.1	Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	As required.	Urban Quarter advice 26 September 2018	There was no request by the Department for an independent audit of compliance during the audit period.	N/A
EPBC 10.1	The approval holder may choose to revise a management plan approved by the Minister under condition 4 without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised plan would not be likely to have a new or increased impact. If the approval holder makes this choice, they must notify the Department in writing that the approved plan has been revised and provide the Department, at least four weeks before implementing the revised plan, with: <ul style="list-style-type: none"> <li>a. an electronic copy of the revised plan;</li> <li>b. an explanation of the differences between the revised plan and the approved plan; and</li> <li>c. the reasons the approval holder considers that taking the action in accordance with the revised plan would not be likely to have a new or increased impact.</li> </ul>	As required.	R_002_Strategen-JBSG_VCAMP Rev 1_02102018	There were no variations to the VCAMP during the audit period. The latest revision of the VCAMP (revision 1 [R_002]) was submitted on 2 October 2018 and approved on 3 October 2018 (refer to EPBC 4.1).	N/A
EPBC 11.1	The approval holder may revoke their choice under condition 10 at any time by notice to the Department. If the approval holder revokes the choice to implement a revised plan, without approval under section 143A of the Act, the plan approved by the Minister must be implemented.	As required.	Urban Quarter advice 26 September 2018	This condition was not invoked during the audit period.	N/A
EPBC 12.1	If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised plan would be likely to have a new or increased impact, then: <ul style="list-style-type: none"> <li>a. Condition 10 does not apply, or ceases to apply, in relation to the revised plan; and</li> <li>b. The approval holder must implement the plan approved by the Minister.</li> </ul> To avoid any doubt, this condition does not affect any operation of conditions 10 and 11 in the period before the day the notice is given. <p>Conditions 10, 11 and 12 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised plan to the Minister for approval.</p>	As required.	Urban Quarter advice 26 September 2018	The Minister did not give such notice during the audit period.	N/A
EPBC 13.1	Unless otherwise agreed to in writing by the Minister, the approval holder must publish all management plans referred to in these conditions of approval on their website for the duration of this approval. Each management plan must be published on the website within 1 month of being approved by the Minister or being submitted under condition 10 and must remain on the website for the life of this approval.	Within 1 month of being approved by the Minister or being submitted under condition 10.	R_002_Strategen-JBSG_VCAMP Rev 1_02102018 C_003_DEE_VCAMP approval_03102018 C_004_Urban Quarter_VCAMP website upload_24062019	The latest revision of the VCAMP (revision 1 [R_002]) was approved on 3 October 2018 (C_003), however was not published on the Project website until 24 June 2019 (C_004). Based on the timing of the VCAMP upload, which did not occur within 1 month of the VCAMP being approved by the Minister, the auditor has assessed this item as potentially non-compliant. There was some confusion between Strategen-JBS&G and the approval holder as to who would list the management plans on their website. Once it was realised it had not been done by either party, the approval holder immediately implemented the publishing of the management plan on their project website.	Potentially non-compliant

## 5. Limitations

### Scope of services

This report ("the report") has been prepared by Strategen-JBS&G in accordance with the scope of services set out in the contract, or as otherwise agreed, between the Client and Strategen-JBS&G. In some circumstances, a range of factors such as time, budget, access and/or site disturbance constraints may have limited the scope of services. This report is strictly limited to the matters stated in it and is not to be read as extending, by implication, to any other matter in connection with the matters addressed in it.

### Reliance on data

In preparing the report, Strategen-JBS&G has relied upon data and other information provided by the Client and other individuals and organisations, most of which are referred to in the report ("the data"). Except as otherwise expressly stated in the report, Strategen-JBS&G has not verified the accuracy or completeness of the data. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the report ("conclusions") are based in whole or part on the data, those conclusions are contingent upon the accuracy and completeness of the data. Strategen-JBS&G has also not attempted to determine whether any material matter has been omitted from the data. Strategen-JBS&G will not be liable in relation to incorrect conclusions should any data, information or condition be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to Strategen-JBS&G. The making of any assumption does not imply that Strategen-JBS&G has made any enquiry to verify the correctness of that assumption.

The report is based on conditions encountered and information received at the time of preparation of this report or the time that site investigations were carried out. Strategen-JBS&G disclaims responsibility for any changes that may have occurred after this time. This report and any legal issues arising from it are governed by and construed in accordance with the law of Western Australia as at the date of this report.

### Environmental conclusions

Within the limitations imposed by the scope of services, the preparation of this report has been undertaken and performed in a professional manner, in accordance with generally accepted environmental consulting practices. No other warranty, whether express or implied, is made.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

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## 6. References

Australian Department of the Environment (DotE), 2014, Annual Compliance Report Guidelines [Online], Commonwealth of Australia. Available from:  
<http://www.environmental.gov.au/epbc/publications/annual-compliance-report-guidelines>

## Appendix A Implementation of the Vegetation and Conservation Area Management Plan

Table A.1: VCAMP audit table

Reference	Key Action	Timing	Evidence	Comments	Conformance status
<b>Black Cockatoo habitat and Banksia Woodland TEC management</b>					
VCAMP 1	A temporary 1.8m chain mesh fence with shade cloth will be installed in the following circumstances: <ul style="list-style-type: none"> <li>along the project boundary to delineate between construction and adjacent property where vegetation is present on the adjacent property; and</li> <li>along the boundary of retained vegetation within the Project Area be it Conservation POS or other retained vegetation.</li> </ul>	Pre-construction	Site inspection 26 September 2018.  P_006_Strategen-JBS&G_Boundary fencing_26092019  P_007_Strategen-JBS&G_Conservation POS bunting_26092019  P_008_Strategen-JBS&G_Conservation POS bunting and fencing_26092019  P_009_Strategen-JBS&G_Retained vegetation fencing_26092019  P_010_Strategen-JBS&G_POS East retained vegetation fencing_02062019	Chain mesh fencing with shade cloth has been installed along the project boundary to delineate between construction activities and vegetation on the adjacent property (P_006).  Proposed retained vegetation as required by the City of Wanneroo Local Planning Policy is situated adjacent to the Stage 1 clearing area. Construction fencing has been erected along the boundary of this retained vegetation (P_009; P_010), however, does not incorporate shade-cloth. The intent of this management action is to ensure that no unapproved clearing is undertaken and to minimise potential degradation of vegetation during construction activities. The fencing in place adequately demarcates retention areas to avert accidental clearing and prevent the spread of rubbish and debris into the area. Notwithstanding this, shade cloth is recommended to be installed to reduce the spread of dust as a result of construction activities into the retention area.  The Black Cockatoo habitat and Banksia Woodland TEC conservation areas, as identified in Figure 2 of the VCAMP, are located approximately 1 - 2 kilometres (km) from construction activities and have restricted access. Based on the remote location of the future POS sites and access restrictions, the auditor concludes that fencing as described in VCAMP 1 is not required until such time construction activities about the proposed retained vegetation. Notwithstanding this, a combination of fencing and bunting has been erected around the conservation areas to act as a visual barrier (P_007; P_008).	Conformant
VCAMP 2	Provide GPS co-ordinates of areas approved to be cleared and retained to the contractor to ensure no unapproved clearing is undertaken.	Prior to the commencement of clearing	C_005_Cossill & Webley_Clearing Earthworks Drawing Transmittal – East of the Beach Stage 1_19092018	Evidence of correspondence between civil contractors and engineers was sighted during the audit (C_005). The correspondence included details and surveyor's drawings of areas approved to be cleared.	Conformant
VCAMP 3	Clearly mark CBC habitat proposed to be retained on construction drawings and delineated by survey pegs and/or temporary fencing along the entire stage boundary.	Pre- & during clearing	Site inspection 26 September 2019  G_001_Cossill & Webley_Clearing Plan_19082018  G_003_Cossill & Webley_Retained vegetation fencing_10102018	Vegetation to be retained, located adjacent to Stage 1 construction activities was clearly marked on surveyors' drawings provided by Cossills & Webley (G_001). Fencing has been erected around the boundary of the retained vegetation (G_003; P_009; P_010) and was sighted during the site inspection.	Conformant
VCAMP 4	Clearly mark trees proposed to be retained on construction drawings and by coloured tape within the Project site.	Pre- & during clearing	Refer to VCAMP 3.	Refer to VCAMP 3.	Conformant
VCAMP 5	Install appropriate temporary signage where appropriate to restrict unauthorised access to retention areas (once defined).	Pre and during construction	P_011_Strategen-JBS&G_Retained vegetation signage_07022019	Signage was installed to restrict unauthorised access to the retained vegetation areas where appropriate (P_011).	Conformant
VCAMP 6	Maintain appropriate separation between the retention area boundaries and development area interface to control access (for example fencing, bollards, footpaths, garden beds).	Post-construction	Refer to VCAMP 3.	Refer to VCAMP 3.	Conformant
VCAMP 7	Investigate and document potential CBC nesting trees within the area to be cleared to determine if there are any hollows being utilised or are capable of being utilised by CBC for nesting.  If any CBC(s) is detected utilising any hollow in any tree, the approval holder must: <ul style="list-style-type: none"> <li>clearly identify and mark the nesting tree</li> <li>maintain a register of nesting trees</li> <li>only clear the identified nesting tree and vegetation within a 10 m radius of that tree, if a suitably qualified person has verified that the hollow in the tree is no longer being used by the CBC(s).</li> </ul>	Within 7 days of clearing, during CBC breeding season (1 July to 28 February)	C_001_Strategen-JBSG_EPBC 2017_7872-Notificaiton of Clearing_18102018  C_002_RFirth_VCAMP and Black Cockatoo breeding Eglinton for Urban Quarter_05102018  R_001_Strategen-JBSG_Fauna Relocation Report_09102018  C_006_Strategen-JBSG_Trees with hollows for cockatoos_06092018	Clearing for Stage 1 of the development commenced on 8 October 2018 (C_001), during the CBC breeding season.  In email correspondence provided on 5 October 2018, Strategen-JBS&G zoologist Ron Firth confirmed that during the fauna relocation programme, which occurred between 1-4 October (R_001), a habitat tree assessment was conducted. The assessment identified no breeding trees or potential breeding habitat within the Stage 1 site (C_002). Additionally, in advice provided by Strategen-JBS&G it was noted that only two trees with hollows are present within the development site (C_006). These trees are located to the east of the Freeway reserve and will not be disturbed until later stages of the development.	Conformant
VCAMP 8	For each cleared hollow that is being utilised, or capable of being utilised by the CBC(s), at least three artificial nesting hollows must be installed, whereby:	Prior to 1 July of preceding year	Refer to VCAMP 7.	Refer to VCAMP 7.	N/A

Reference	Key Action	Timing	Evidence	Comments	Conformance status
	<ul style="list-style-type: none"> <li>installed within a 12 km radius of the cleared nesting tree(s)</li> <li>constructed, positioned, erected and maintained in accordance with relevant artificial hollow guidance, to maximise the likelihood that the artificial nesting hollows are utilised by CBC</li> <li>installed before the commencement of the following breeding season</li> <li>inspected and maintained at least annually to check for condition and evidence of CBC use.</li> </ul>				
VCAMP 9	Contact the Department of Biodiversity, Conservation and Attractions (DBCAs) Wildcare Helpline 24-hour emergency hotline on (08) 9474 9055 if sick or injured animals are encountered.	Within 12 hours of the sick or injured fauna being encountered and as required.	Urban Quarter advice 26 September 2019. C_007_RJV_EOTB -D0501A-E VCAMP QA Part 1_31052019. R_005_RJV_East of the Beach Site Specific Induction_05102018.	The auditors were advised that there were no sick or injured animals encountered during the audit period and therefore the hotline was not contacted.  The site-specific induction communicates the requirement to report all sick or injured fauna to the Site Supervisor (R_005). In email correspondence from the Site Supervisor, it was confirmed that there were no reportable incidents on site (C_007).	N/A
VCAMP 10	Temporary drainage to be constructed away from retained or adjacent vegetation such that surface water flows do not interact with vegetation.	Prior to and during construction	R_012_Cossill & Webley_Site Meeting No 5 Meeting Minutes - East of the Beach Stage 1 - 5826-01_12122018 R_013_Cossill & Webley_ - Site Meeting No 6 Meeting Minutes - East of the Beach Stage 1 - 5826-01_23012019	Drainage plans included stormwater drain provisions to protect areas of retained vegetation (R_012). Site meeting minutes indicate that these drawings plans were issued to RJV issued during construction (R_013).	Conformant
VCAMP 11	Permanent fencing (as approved by the CoW) will be installed around the boundary of the Conservation POS. This fencing will also restrict unwanted fauna (i.e. kangaroos, rabbits and domestic animals) from entering Conservation POS areas.	Within four weeks of approval from CoW, and post construction	Site inspection 26 September 2019. P_007_Strategen-JBS&G_Conservation POS bunting_26092019 P_008_Strategen-JBS&G_Conservation POS bunting and fencing_26092019	Based on the remote location of the future POS sites and access restrictions, the auditor concludes that fencing as described in this action is not required until such time construction activities about the proposed retained vegetation. Notwithstanding this, a combination of fencing and bunting has been erected around the conservation areas to act as a visual barrier and access is restricted through a series of locked gates (P_007; P_008).	N/A
VCAMP 12	Educational signage to be installed to inform residents on the conservation values related to Black Cockatoo, associated with the conservation POS.	Within four weeks of approval from CoW, and post construction	Refer to VCAMP 11.	Based on the remote location of the conservation POS areas from the current stages of works and access restrictions currently in place, including entry via locked gates, the auditors conclude that this action is not yet required.	N/A
<b>Weed and pathogen management</b>					
VCAMP 13	Prior to entering the Project Area, all vehicles, machinery, equipment and footwear are free of mud and soil.	At all times	R_003_Stone Civil_Vehicle and Mobile Plant Weed Hygiene Checklist 1_01012019 R_004_Stone Civil_Vehicle and Mobile Plant Weed Hygiene Checklist 2_20112018 R_005_RJV_East of the Beach Site Specific Induction_05102018 R_006_RJV_EOTB Stage 1 Induction Register_23112018	Site washdown requirements are detailed in the site-specific induction (R_005). Stone Civil provided weed hygiene checklists to confirm vehicle and mobile plant provided were not contaminated (R_003; R_004).	Conformant
VCAMP 14	Restrict access of vehicles to areas of construction to minimise the spread or introduction of weeds or pathogens. Access restrictions will be communicated through inductions, signage and fencing.	Pre- & during construction	P_001_Strategen JBSG_Site access point_26092019 P_002_Strategen JBSG_Site access point and signage_26092019 P_003_Strategen JBSG_Construction boundary fencing_26092019 R_005_RJV_East of the Beach Site Specific Induction_05102018 R_006_RJV_EOTB Stage 1 Induction Register_23112018	Access restrictions are communicated via the site-specific induction (R_005; R_006) and signage located at the site entry point (P_001; P_002).  Fencing has been erected around undeveloped portions of the development controlling access to these areas (P_003).	Conformant
VCAMP 15	Ensure any fill/soil brought onto site is certified disease free.	During construction	Urban Quarter advice 26 September 2019 G_002_Cossill & Webley_Stage 1 Bulk Earthworks Plan_19092018 R_009_BioOrganics_PSS-Enviro Mulch_15112019	A cut to fill earthworks balance was undertaken during the Stage 1 development (G_002) and therefore no additional fill/soil was brought onto site for the purpose of civil works.  Construction of the sales office and associated landscaping was undertaken during the audit period. Mulch and soil used in landscaping was sourced from Bio Organics and product specification sheets provided confirmed that	Conformant

Reference	Key Action	Timing	Evidence	Comments	Conformance status
			R_010_BioOrganics_PSS-Universal Soil_15112019	products are clean and free from weeds, seeds and pathogens (R_009; R_010).	
VCAMP 16	If necessary, based on monitoring, develop a weed control program and appoint an experienced contractor to manage weeds within the Conservation POS areas A and B.	During construction and post-construction for a period of five years up until handover of Conservation POS areas and to CoW. Frequency will depend on the type of weeds present based on the advice of a weed control expert	Urban Quarter advice 26 September 2019	Weed monitoring has not yet commenced within conservation POS areas A and B and therefore a weed control program has not been established.  Construction adjacent to these conservation areas is not anticipated for a number of years and therefore monitoring is proposed to commence closer to the time that construction abuts these areas to inform weed control requirements.	N/A
VCAMP 17	During weed control the following practices will be implemented: <ul style="list-style-type: none"> <li>• use of biodegradable marking dye during all spot spraying tasks</li> <li>• installation of safety warning signage around the perimeter of the area to be controlled including information on the type of weed control and planned timing (signage shall be in place prior to application, and removed once area has dried)</li> <li>• undertaking spraying only under calm weather as identified in the herbicide manufacturers recommendations.</li> </ul>	During construction and post-construction for a period of 5 years up until handover of POS to CoW	Refer to VCAMP 16.	Refer to VCAMP 16.	N/A
VCAMP 18	All plants and other materials used in landscaping will be free of soil that may contain dieback or weeds (i.e. plants supplied by a NIASA accredited nursery).	During landscaping	Refer to VCAMP 15.	Refer to VCAMP 15.	Conformant
VCAMP 19	All construction personnel will be inducted in relation to weed and dieback risk, potential impacts and management.	Prior to commencing works on site	R_005_East of the Beach Site Specific Induction_05102018 R_006_RJV_EOTB Stage 1 Induction Register_23112018	Weeds and dieback risks and associated management strategies are communicated to site personnel via the site-specific induction (R_005; R_006).	Conformant
VCAMP 20	Stormwater management will be designed and constructed to prevent drainage into sensitive areas, i.e. the Conservation POS to prevent the spread of weeds and pathogens.	Detailed design and construction	Refer to VCAMP 10.	Refer to VCAMP 10.	Conformant
<b>Amenity</b>					
VCAMP 21	Earthwork contours are graded away from adjacent or retained vegetation.	Within three months of Project completion	G_002_Cossill & Webley_Stage 1 Bulk Earthworks Plan_19092018	Earthworks contours as shown in the Stage 1 bulk earthworks plan (G_002) are shown to be graded away from retained vegetation.	Conformant
VCAMP 22	Stabilise all slopes that are potentially subject to water run off or wind erosion.	Within three months of Project completion	Site inspection 26 September 2019 P_004_Strategen-JBSG_Hydromulch application on slope_26092019	Hydro mulch was applied to sloping areas and was sighted during the site inspection (P_004).	Conformant
VCAMP 23	Cleared areas will be stabilised to prevent wind-blown dust generating on site.	During construction	Site inspection 26 September 2019 P_004_Strategen-JBSG_Hydromulch application on slope_26092019 P_005_Strategen-JBSG_hydromulch application on lot_26092019	Hydromulch has been applied to cleared areas and was sighted during the site inspection (P_004; P_005).	Conformant
VCAMP 24	Water carts will be used in conjunction with earth moving activities and as required based on prevailing weather conditions at the time of construction works.	During construction	R_007_RJV_EOTB Stage 1 Weekly Checklist_15102018	Visual monitoring of dust is undertaken daily and actioned where required. The Supervisor-Engineer Daily Checklist indicates that watercarts were used throughout Stage 1 construction activities (R_007).	Conformant
VCAMP 25	Inspection of the construction boundary to identify any dust emissions outside the construction boundary.	During times of high winds, in accordance with Bureau of Meteorology updates and opportunistically	R_007_RJV_EOTB Stage 1 Weekly Checklist_15102018	Daily inspections of the construction boundary were undertaken by RJV as part of the Supervisor-Engineer daily checklist (R_007) which included visual dust inspections.	Conformant
VCAMP 26	The site induction will include details regarding waste management on site.	At all times	R_005_RJV_East of the Beach Site Specific Induction_05102018 R_006_RJV_EOTB Stage 1 Induction Register_23112018	Waste management is communicated via the site-specific induction (R_005; R_006) and includes: <ul style="list-style-type: none"> <li>• location of bins on site</li> <li>• site waste disposal</li> <li>• information on rubbish dumping</li> <li>• the removal and disposal of rubbish that may drift along the project boundary</li> </ul>	Conformant

Reference	Key Action	Timing	Evidence	Comments	Conformance status
VCAMP 27	Remove rubbish that may drift along the boundary before it enters retained Conservation POS or the adjacent Banksia Woodland TEC.	During clearing and construction	Urban Quarter advice 26 September 2019 R_007_RJV_EOTB Stage 1 Weekly Checklist_15102018	Compliance with onsite waste management and inspection of the stage boundary is checked daily during clearing and construction works (R_007) with any rubbish that is identified removed and disposed of appropriately.	Conformant
VCAMP 28	Removal of any rubbish that has been dumped or drifted into the retained Conservation POS area or adjacent Banksia Woodland TEC as a result of the Project construction activities.	During clearing and construction	Refer to VCAMP 26.	Refer to VCAMP 26.	Conformant
<b>Monitoring parameters - assessment of impacts to Black Cockatoos</b>					
VCAMP 29	Record of fauna expert appointed to inspect clearing area for Black Cockatoo activity and associated report/memo	Within 7 days of clearing during CBC breeding season (1 July to 28 February)	C_001_Strategen-JBSG_EPBC 2017_7872-Notificaiton of Clearing_18102018 C_002_RFirth_VCAMP and Black Cockatoo breeding Eglinton for Urban Quarter_05102018 R_001_Strategen-JBSG_Fauna Relocation Report_09102018 C_006_Strategen-JBSG_Trees with hollows for cockatoos_06092018	Strategen-JBS&G zoologist Ron Firth confirmed via email (5 October 2018) that a habitat tree assessment was conducted during the fauna relocation programme. The assessment identified no breeding trees or potential breeding habitat within the Stage 1 development site (C_002).  The fauna relocation programme was undertaken between 1 – 4 October 2018 (R_001), within 7 days prior to clearing.	Conformant
VCAMP 30	Reports of fauna collisions and actions taken	As soon as possible following the incident	Urban Quarter advice 26 September 2019 C_007_RJV_EOTB 1-D0501A-E VCAMP QA Part 1_31052019 R_011_Cossill&Webley_Pre-Clearing Meeting Minutes – East of the Beach Stage 1 – 5826-01_02102018	Incidents are recorded in the incident register maintained by RJV (R_011). Urban Quarter and RJV advised that there were no incidents recorded during the audit period including reports of fauna collisions during (C_007).	N/A
VCAMP 31	No loss or degradation to Black Cockatoo habitat retained in conservation areas	Annually as a minimum when clearing and construction are taking place and/or following clearing of a stage adjacent to the Conservation POS	Urban Quarter advice 26 September 2019. Site inspection 26 September 2019.	No clearing occurred adjacent to, or within Conservation POS during the audit period.	N/A
VCAMP 32	Reports of fire in the Project area and condition of the vegetation	As soon as possible following the incident	Urban Quarter advice 26 September 2019. C_007_RJV_EOTB 1-D0501A-E VCAMP QA Part 1_31052019 R_011_Cossill&Webley_Pre-Clearing Meeting Minutes - East of the Beach Stage 1 - 5826-01_02102018	Incidents are recorded in the incident register maintained by RJV (R_011). Urban Quarter and RJV advised that there were no incidents recorded during the audit period relating to fires (C_007).	N/A
<b>Monitoring parameters – assessment of impacts to Banksia Woodland TEC</b>					
VCAMP 33	Site inspection to assess the condition of fencing used to delineate areas of retention, and barriers used to block unwanted access	Fortnightly for the first 6 months following commencement of clearing and then quarterly thereafter during construction	R_007_RJV_EOTB Stage 1 Weekly Checklist_15102018	Site fencing is inspected daily to ensure it is secure and remains in place. Windrows are also checked daily to confirm they remain in place as barricading/ delineation (R_007).	Conformant
VCAMP 34	Approved clearing boundaries cross referenced against site inspections and/or current aerial photography	Fortnightly during clearing, or as otherwise required by regulatory authorities as part of construction site inspections	G_001_Cossill & Webley_Clearing Plan_19082018 P_003_Strategen-JBS&G_Construction boundary fencing_26092019 R_007_RJV_EOTB Stage 1 Weekly Checklist_15102018	Prior to the commencement of clearing, the approved clearing boundary is surveyed and fencing erected to clearly delineate clearing areas (G_001; P_003). The Supervisor-Engineer Daily Checklist includes an item to inspect the approved clearing boundary to ensure the areas remain clearly delineated from areas not to be cleared (R_007).	Conformant
VCAMP 35	Cleared area not to exceed approved clearing area	Annually during construction after clearing has commenced	R_007_RJV_EOTB Stage 1 Weekly Checklist_15102018	The stage boundary is inspected daily during clearing and construction activities to prevent over clearing (R_007). Additionally, the annual compliance report reconciles actual clearing against EPBC boundaries to confirm that there has been no exceedance in in the authorised clearing area (refer to EPBC 1.1).	Conformant
<b>Monitoring parameters – weed and dieback assessment</b>					
VCAMP 36	Site walkover to assess distribution, and abundance of weed species	Annually in Spring following commencement of	Urban Quarter advice 26 September 2019. R_002_Strategen-JBS&G_VCAMP Rev 1_02102018	This action relates to the Conservation POS areas (R_002). Construction adjacent to Conservation POS is not anticipated for a number of years and therefore monitoring is proposed to commence closer to the time that construction is adjacent to these areas.	N/A

Reference	Key Action	Timing	Evidence	Comments	Conformance status
		construction until handover to CoW			
VCAMP 37	Site assessment undertaken by a dieback consultant to determine if dieback is present	Three years after the commencement of construction	Urban Quarter advice 26 September 2019. R_002_Strategen-JBS&G_VCAMP Rev 1_02102018	This action relates to the Conservation POS areas (R_002) and has not yet been undertaken.	N/A
<b>Monitoring parameters – amenity</b>					
VCAMP 38	Site walkover to assess the extent of erosion and dust	Opportunistically during clearing and construction and/or following heavy rain and strong wind conditions	Urban Quarter advice 26 September 2019. R_007_RJV_EOTB Stage 1 Weekly Checklist_15102018	Erosion and dust are monitored daily as part of the Supervisor-Engineer Daily Checklist (R_007). Urban Quarter advised that opportunistic inspections are also undertaken to inspect potential areas where erosion may occur.	Conformant
VCAMP 39	Visual inspection of earthwork slopes to monitor erosion	Opportunistically during clearing and construction and/or following heavy rain and strong wind conditions	R_007_RJV_EOTB Stage 1 Weekly Checklist_15102018	Slopes of excavations are inspected daily to ensure they remain within the standard requirements (R_007).	Conformant
VCAMP 40	Site inspections to assess project associated rubbish drift/dumping in the conservation areas or along the boundary	Fortnightly during clearing and construction	R_007_RJV_EOTB Stage 1 Weekly Checklist_15102018	Waste management on site is inspected daily during the Supervisor-Engineer Daily Checklist (R_007).	Conformant

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