

Report

Naturaliste Heights Residential Development - Lot 9020 Martingale Road, Dunsborough, WA

Dunsborough Joint Venture

Western Ringtail Possum Management Plan

18 February 2025

(Rev 1)

Prepared by: EDS Environmental

1. Declaration of Accuracy

- EPBC number: 2018/8278
- Project name: Residential Development Lot 9018 Martingale Road and Lot 377 Clinker Drive, Dunsborough
- Action management plan title: Western Ringtail Possum Management Plan (EPBC 2018/8278) REV B
- Proponent /approval holder and ACN or ABN: Dunsborough Joint Venture,
- Proposed / approved action: Residential Development
- Location of the action: Lot 9020 (previously 9019) Martingale Road, Dunsborough, within the Shire of Busselton
- Date of preparation of the action management plan: February 2025
- Person accepting responsibility for the action management plan: Dunsborough Joint Venture
- Declaration of accuracy
- I declare that to the best of my knowledge, all the information contained in, or accompanying this document is complete, current and correct. I am duly authorised to sign this declaration on behalf of the proponent/approval holder. I am aware that:
 - a) giving false or misleading information is a serious offence under section 137. 1 of the Criminal Code Act 1995 (Cth)
 - b) section 137.2 of the Criminal Code Act 1995 (Cth) makes it an offence for a person to produce a document to another person in compliance or purported compliance with a law of the Commonwealth where the person knows that the document is false or misleading;
 - c) section 490 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) makes it an offence for an approval holder to provide information in response to an approval condition where the person is reckless as to whether the information is false or misleading; and
 - d) section 491 of the EPBC Act makes it an offence for a person to provide information or documents to specified persons who are known by the person to be performing a duty or carrying out a function under the EPBC Act or the Environment Protection and Biodiversity Conservation Regulations 2000 (Cth) (EPBC Regulations) where the person knows the information or document is false or misleading.

Signed: _____



Full name: Henry Dykstra

Organisation: Harely Dykstra ABN: 77 503 764 248

Date 31/07/2025

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Appendix A WRP Survey (Biologic, 2022)

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1. Proposal Description

1.1 Project Background

Dunsborough Joint Venture (herein referred to as the proponent) proposes the development of residential lots (the Proposal) within Lot 9020 (previously 9019) Martingale Road, Dunsborough (herein referred to as the Proposal area) (refer to **Figure 1**).

The Proposal will require the removal of **2.3 hectares** (ha) of vegetation (disturbance footprint). In contrast, **18.9 ha** of native vegetation within the Proposal area will be surrendered and put into a conservation reserve (Conservation area). Additionally, the establishment of the Conservation area will require the rezoning of **8.85 ha** of land currently zoned as 'Residential' to 'Parks and Recreation'.

1.2 Approval context

1.2.1 Commonwealth Approval (EPBC Act)

The Proposal was referred to the Department of the Environment and Energy (DotEE; now the Department of Climate Change, Energy, the Environment and Water [DCCEEW]) on October 10, 2018, due to anticipated impacts on Matters of National Environmental Significance (MNES) protected under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act). The proposed action referred to at the time included a disturbance footprint of **11.5 ha**.

On 19th December 2018, a delegate of the Minister for the Environment determined that the proposed action is a controlled action and will be assessed by preliminary documentation.

1.3 Project location

The Proposal area is located within the City of Busselton, approximately 26 kilometres (km) west of Busselton and 250 km southwest of Perth, as presented in **Figure 1**.

1.4 Purpose

The purpose of this Western Ringtail Possum (WRP) Management Plan (the Plan) is to present the findings of the Targeted WRP surveys undertaken by Biologic (2022) and Western Environmental (2023) within the Proposal area and outline the actions to monitor and manage impacts to the species.

Relevant guidelines such as recovery plans, interim recovery plans, conservation advice, and threat abatement plans were considered during the preparation of this Plan. This Plan has been prepared consistent with the following guidance documentation:

- Department of Climate Change, Energy, the Environment and Water (DCCEEW) (2024) *Environmental Management Plan Guidelines*.
- Department of the Environment and Energy (DoEE) (2019) *Action Management Plan Criteria*

The structure and content of the Plan is aligned with DCCEEW (2024).

1.5 Objective

The objective of this Plan is to manage potential impacts on WRP resulting from the implementation of the Proposal, to ensure that there are no long-term detrimental effects on the resident WRP population. The Plan has been prepared with consideration given to the following guidance documents:

- Department of Parks and Wildlife (2017). *Western Ringtail (Possum Pseudocheirus occidentalis) Recovery Plan*. Wildlife Management Program No. 58. Department of Parks and Wildlife, Perth, WA.
- Threatened Species Scientific Committee (2018). *Conservation Advice (Pseudocheirus occidentalis) Western Ringtail Possum*. Canberra: Department of the Environment and Energy.

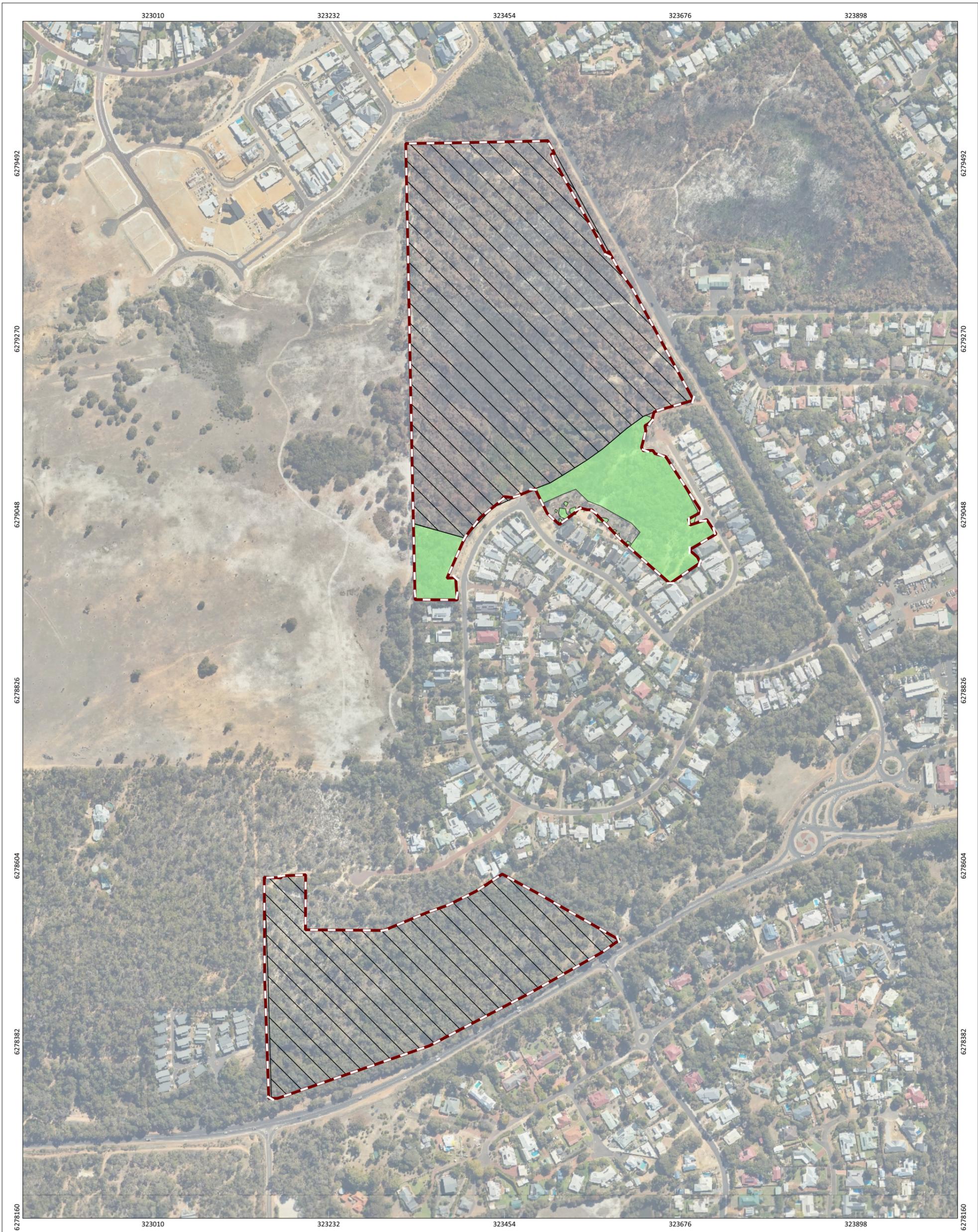


Figure 1: Disturbance Footprint and Offset Area

	PROJECT/REPORT NAME WRPMP Lot 9020 Martingale Road, Dunsborough		Legend Proposed Action Area Offset Area Disturbance Footprint	<table border="1"> <thead> <tr> <th>No</th> <th>Description</th> <th>Drawn</th> <th>Approved</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Original issue</td> <td>MD</td> <td>BH</td> <td>22/7/2025</td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No	Description	Drawn	Approved	Date	A	Original issue	MD	BH	22/7/2025															
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COORDINATE REFERENCE SYSTEM GDA2020 / MGA zone 50		PROJECT NUMBER A25.024	VERSION 0																										
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2. Roles and Responsibilities

2.1 Roles and Responsibilities

The Proponent, contractors and associated employees involved in the development of the Proposal are responsible for the environmental performance of their actions and for complying with this Plan and all associated environmental conditions.

The Proponent understands that environmental management actions contained within this Plan are legal requirements that are to be met. The Proponent will appoint a suitably qualified Environmental Manager, to act on their behalf during the implementation of the proposed action.

The appointed Environment Manager will take responsibility for implementation of the management actions outlined within this Plan, on behalf of Proponent. Should management actions be undertaken by contractors and associated employees, the Environmental Manager will be advised prior to and following this work.

The roles and responsibilities for delivering this Plan are provided in Table 1.

Table 1: Roles and Responsibilities

Role	Responsibilities
Site Manager	Responsible for ensuring adequate resources are available to implement the requirements of this Plan. They are also responsible for assisting with the development and implementation of training, inspections monitoring and reporting, and internal and external reporting of environmental performance, incident response and notifications.
Site Supervisor	The Site Supervisor is responsible for environmental performance and compliance for the proposed action. Specific responsibilities include managing site works, ensuring employees and contractors are competent based on training, education, and experience, ensuring processes and resourcing are in place to implement this Plan, and reporting any incidents or non-compliances to the Site Manager. The Site Supervisor is responsible for implementing the Plan, ensuring all personnel are suitably trained, conducting site inspections of environmental controls, and reporting on environmental performance.
Environmental Manager	The environmental manager will assist with the implementation of the plan. They are also responsible for assisting with community complaints/ inquiries, developing and reviewing environmental induction/training materials and conducting site inspections and audits.
Employees and Contractors	Employees and contractors would be required to complete project and site inductions and must attend all environmental training and toolbox meetings. Contractors are required to report any activity which has resulted, or has the potential to result, in an environmental incident.
Contractor ecologist	Undertake pre-clearance ecological surveys and supervise vegetation clearing in accordance with the requirements of this Plan.

2.2 Environmental Training

The Proponent will ensure that all contractors and associated employees working in the Proposal area will undertake a site induction prior to commencing any works.

Before the start of all clearing and construction activities, a pre-start meeting will be undertaken. This pre-start will include a discussion of the environmental value present and the environmental management actions (as outlined in this Plan) that will be implemented, based the stage of the proposed action (e.g., pre-clearing, clearing, and post-clearing).

2.3 Emergency Contacts

In the event of an environmental emergency (e.g. injury to a WRP or clearing outside of the disturbance footprint) all works that have the potential to cause further harm must cease and the Site Supervisor must be contacted immediately.

Any environmental incidents with the potential to cause material harm will be reported to the Site Manager, who will report as required to the relevant authorities.

Internal site telephone lists will be kept up to date for the reporting of emergencies to the appropriate site personnel. Personnel will have the power to stop and direct works. The site emergency management plan will cover more detailed information regarding emergency contacts should the need arise. Emergency contacts are specified below in Table 2.

Table 2: Emergency Contacts for the proposed action

Role	Name	Contact Information
Site Manager	TBC	TBC
Alternate Manager	TBC	TBC

3. Potential Environmental Impacts

3.1 Threats to Protected Matters

Within the context of this Plan, only threats to the WRP have been considered.

3.2 Survey Area

For the purposes of this Plan, the proposal area forms the entire survey extent. The survey effort is shown in **Figure 2**.

3.3 Survey Methodology

3.3.1 Biologic (2022)

A targeted WRP survey was undertaken between May 25 and 27 by Biologic (2022) in a manner that was compliant with State and Commonwealth survey guidelines and policy statements. A summary of the nocturnal survey methodology is as follows:

- Nocturnal surveys were undertaken over two non-consecutive nights (25 and 27 May) to target WRP presence and abundance.
- Efforts were made to traverse the majority of the survey areas in both the northern and southern survey areas whilst avoiding the swamp locations.
- The southern survey area was subject to a nocturnal survey on both nights (full area surveyed on the 25th and partial area on the 27th of May due to time constraints), whereas the northern site was fully surveyed on the 27th of May and partially on the 25th of May due to time and safety constraints. The total nocturnal effort was 10.5 person-hours across two nights.

Please refer to Appendix A for a detailed survey methodology.

3.3.2 Western Environmental (2023)

A Targeted WRP survey was undertaken during November 2023, in a manner compliant with State and Commonwealth survey guidelines and policy statements. A summary of the survey methodology is as follows:

- Nocturnal spotlighting searches were undertaken over two non-consecutive nights (21 and 23 November) along transects spaced between 40-60 m apart, noting that not all areas were spotlighted by Biologic (2022) due to accessibility issues. Survey transects were designed to be as per nocturnal track logs provided in the Biologic (2022) report. Two non-concurrent night surveys of 5-6 hours by one person were undertaken to replicate Biologic (2022) effort.
- Diurnal searches were undertaken (15 and 21 November) for scats and dreys. Ten hours of survey effort was undertaken, allowing for approximately 40-60 m transects to be walked searching for scats and dreys.

Please refer to Appendix B for detailed survey methodology.

3.4 Previous Surveys

A series of surveys were undertaken by Greg Harewood (2017) to identify the presence of individuals within the Proposal area and record the location, if present, of dreys and trees suitable for providing habitat for the species. The surveys involved the following:

- On the 16th October and the 20th, 21st and 25th of November, concurrent with the daytime black cockatoo habitat assessment, dreys (and other potential daytime refuge habitat), scats and individual WRPs were searched for and recorded if observed.
- On the 24th and 27th of November two night-time surveys were undertaken to locate and record the distribution and abundance of WRPs within the proposed action area. The nocturnal counts involved the systematic searching of potential WRP habitats on foot using a head torch.

3.5 Potential Impacts

Implementation of the proposed action will result in the removal of up to 2.3 ha of WRP habitat, as presented in **Figure 3**. In addition, the proposed action may result in the following impacts:

- Habitat loss from direct clearing of native vegetation, including removal of up to five dreys.
- Fauna mortality and/or injury during clearing activities.
- Increase in feral animal species.
- Habitat fragmentation.
- Displacement of approximately seven individuals from within the required clearing areas.

3.6 Retained habitat

As part of the proposed action, no less than 18.9 ha of habitat suitable for WRP will be retained and conserved within the Conservation Area. WRP values recorded within this area are summarized below and presented in **Figure 4**.

- 18.9 ha of potentially suitable habitat.
- 13 individuals recorded.
- 14 dreys.

As part of this Plan, it is proposed that additional artificial dreys will be installed within the Conservation Area, should this be supported by the Department of Biodiversity, Conservation and Attractions (DBCA) to assist in mitigating potential impacts to displaced individuals. These artificial dreys are intended not to be installed within 20 m of existing dreys. The artificial dreys will be installed following consultation with DBCA to ensure appropriate placement, noting that WRPs are territorial species and exist within a defined home range. Some indicative placements of these artificial dreys are presented in **Figure 4**.

No impacts to waterways or the paluslope wetland within the Proposal area are proposed. The wetland will be included within the Conservation area and subject to further protection through the implementation of an Urban Water Management Plan (UWMP). The UWMP is being prepared to support the State planning approval process and will be reviewed by the Department of Biodiversity Conservation and Attractions (DBCA). Additionally, an interim Stormwater Management Strategy will be implemented. Surface water flows into the wetland are via a drainage line from the west. No impacts to the drainage line are anticipated due to the Proposal.

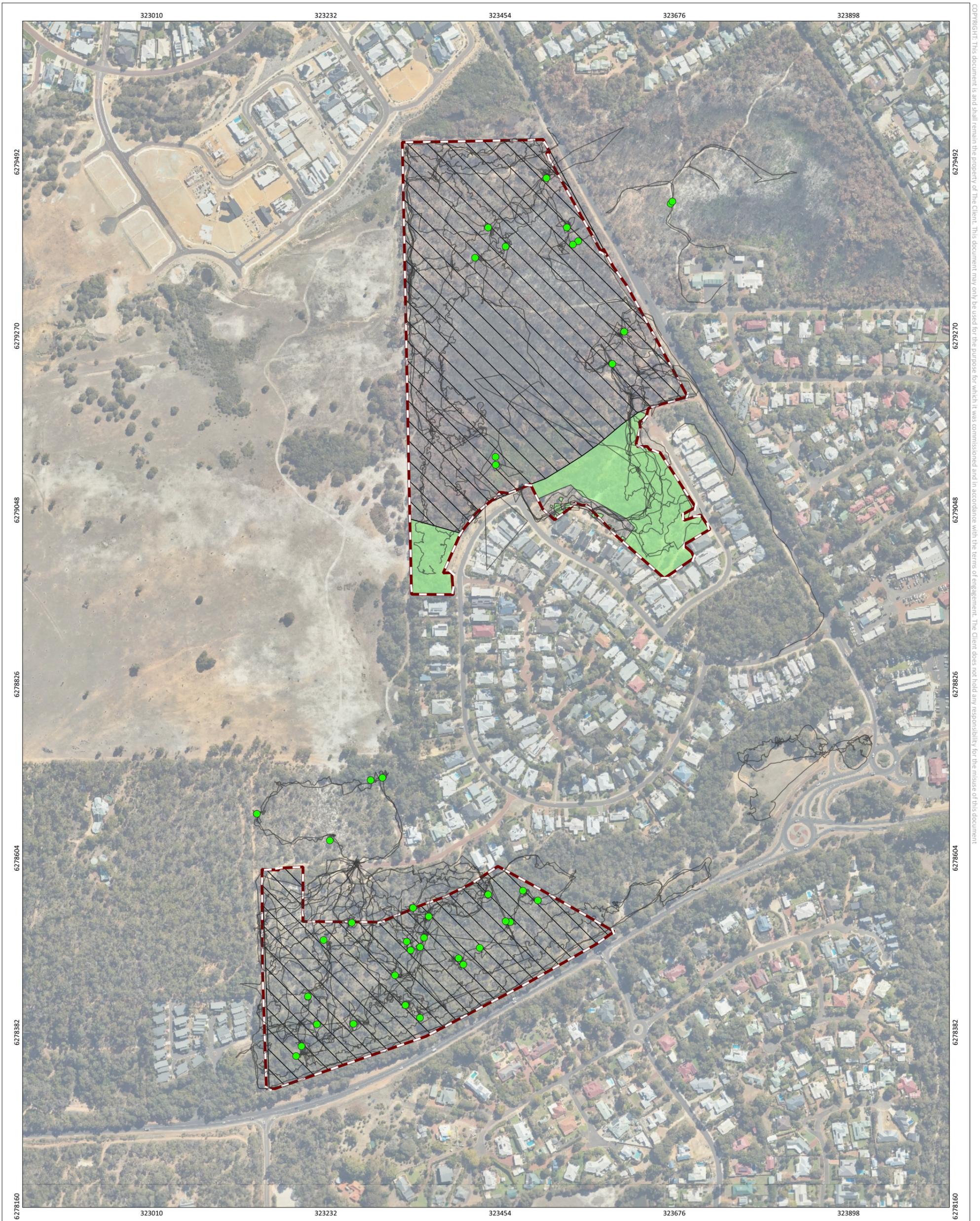


Figure 2: Survey Effort

	PROJECT/REPORT NAME WRPMP Lot 9020 Martingale Road, Dunsborough		Legend Proposed Action Area Disturbance Footprint Offset Area Mapping Notes Tracks Logs	<table border="1"> <thead> <tr> <th>No</th> <th>Description</th> <th>Drawn</th> <th>Approved</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Original issue</td> <td>MD</td> <td>BH</td> <td>22/7/2025</td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No	Description	Drawn	Approved	Date	A	Original issue	MD	BH	22/7/2025															
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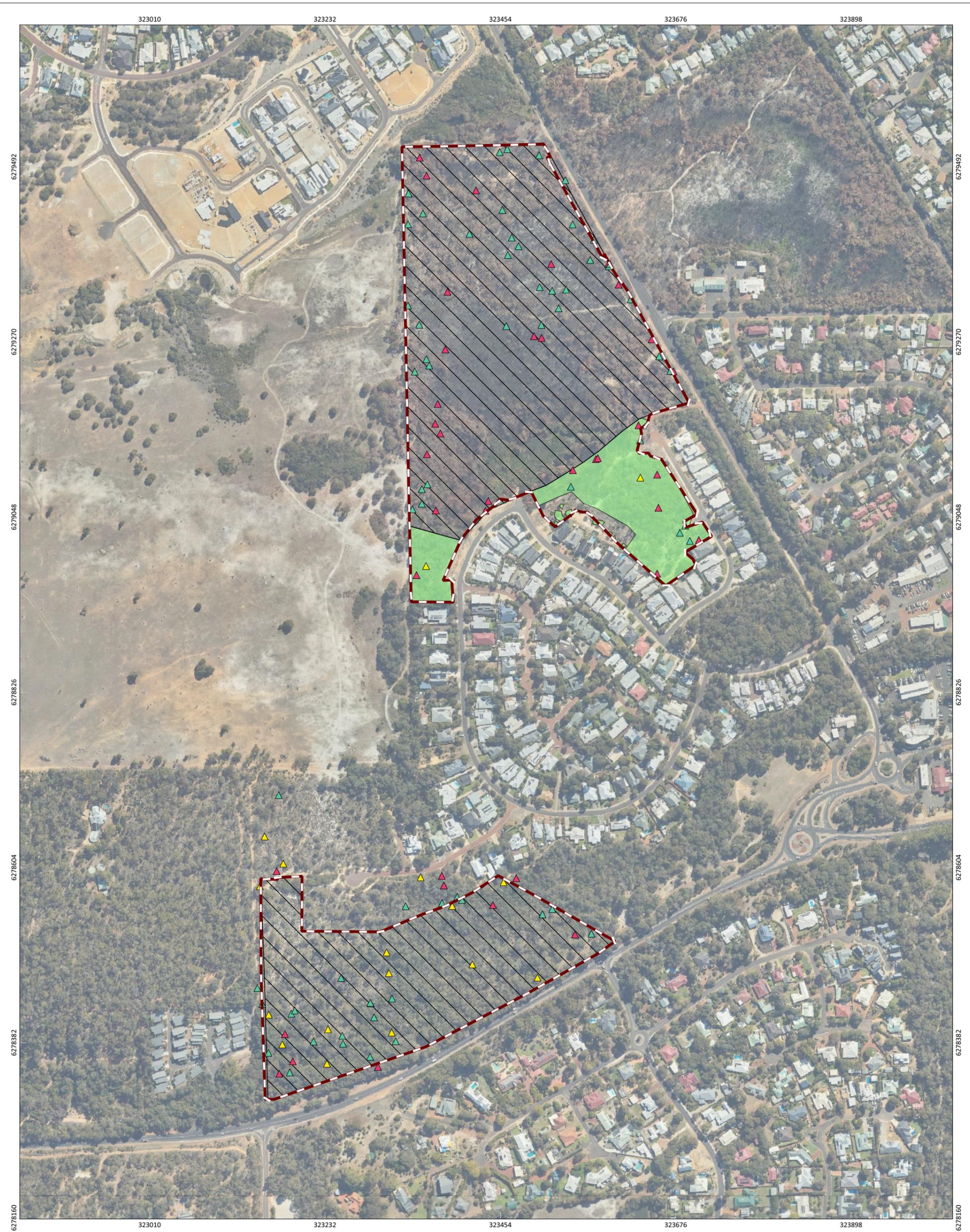


Figure 3: Western Ringtail Possum Occurrence

	PROJECT/REPORT NAME WRPMP Lot 9020 Martingale Road, Dunsborough		Legend Proposed Action Area Offset Area Disturbance Footprint Western Ringtail Possum - Nest or Drey Western Ringtail Possum - Spotlight Western Ringtail Possum - Scat	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No</th> <th>Description</th> <th>Drawn</th> <th>Approved</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Original issue</td> <td>MD</td> <td>BH</td> <td>22/7/2025</td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No	Description	Drawn	Approved	Date	A	Original issue	MD	BH	22/7/2025															
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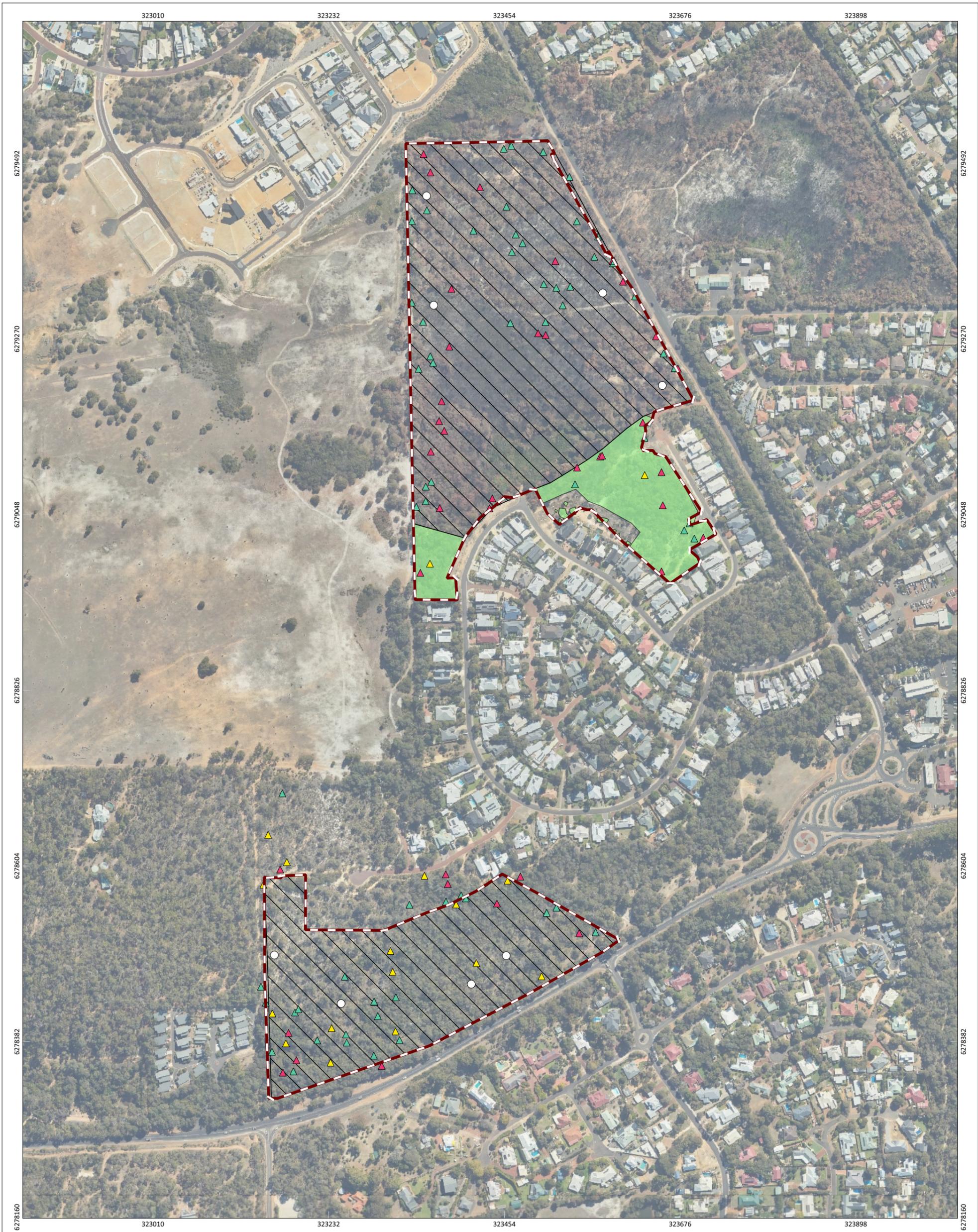


Figure 4: Retained Areas and Western Ringtail Possum Artificial Structures

	PROJECT/REPORT NAME WRPMP Lot 9020 Martingale Road, Dunsborough		Legend Proposed Action Area Disturbance Footprint Offset Area Indicative Artificial Drey Locations	Western Ringtail Possum - Nest or Drey Western Ringtail Possum - Spotlight Western Ringtail Possum - Scat	<table border="1"> <thead> <tr> <th>No</th> <th>Description</th> <th>Drawn</th> <th>Approved</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Original issue</td> <td>MD</td> <td>BH</td> <td>22/7/2025</td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No	Description	Drawn	Approved	Date	A	Original issue	MD	BH	22/7/2025															
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4. Risk Assessment

DCCEEW (2024) and DoEE (2019) identify a requirement for a risk assessment to assess the likelihood and consequence of each potential impact, to ensure that risks are translated into controls, mitigation and management actions.

A standard risk assessment matrix has been applied to the proposed action in accordance with DCCEEW (2024), whereby the 'likelihood' and 'consequence' of events is considered, and monitoring and management actions are identified to control the level of risk.

The proponent has completed a risk assessment for the potential impacts to WRPs as a result of the proposed action. The likelihood and consequence assessment, with the resulting 'risk outcome', have been based upon the residual risk levels after management and monitoring activities are implemented.

The risk assessment is presented in **Table 3**.

Table 3: Risk Assessment

Aspect	Risk	Risk Assessment	Management	Monitoring
Direct Impacts to Individuals	Mortality or injury of WRP during clearing works	<ul style="list-style-type: none"> • Likelihood: Possible • Consequence: Moderate • Risk Outcome: Medium 	<ul style="list-style-type: none"> • Application of management actions outlined in section 6. • Clearing to be conducted during the period June to September. • Supplementary watering will be installed and maintained in potential WRP to be retained within the onsite conservation area. • Installation and maintenance of artificial dreys within the conservation area. • Fencing around conservation area to be installed prior to clearing commencing. • Directional clearing will be implemented. • Pre-clearance surveys will be implemented. • Fauna spotter is to be present during all clearing activities, including post-clearing checks of felled vegetation. 	<p>Monitoring will be undertaken during all stages of the implementation of the proposed action (Pre, during, and Post).</p> <p>Specific Monitoring Actions are prescribed in section 8.</p>
Habitat Clearing	Clearing and/or degradation to suitable habitat outside of approved clearing area	<ul style="list-style-type: none"> • Likelihood: Unlikely • Consequence: Minor • Risk Outcome: Low 	<ul style="list-style-type: none"> • All WRP habitat that is to be retained within the proposed action area. will be surveyed and delineated with fencing before site works to ensure it is conserved. 	<p>Monitoring will be undertaken during all stages of the implementation of the proposed action (Pre, during, and Post).</p> <p>Specific Monitoring Actions are prescribed in section 8.</p>
Indirect Impacts on	Accidental bushfires during	<ul style="list-style-type: none"> • Likelihood: Unlikely • Consequence: High 	<ul style="list-style-type: none"> • The daily fire danger ratings will be obtained from the Bureau of Meteorology and communicated to personnel 	<p>Monitoring will be undertaken during all stages of the implementation of the</p>

adjacent habitat	clearing and construction	<ul style="list-style-type: none"> • Risk Outcome: Medium 	<p>during the daily pre-start meeting.</p> <ul style="list-style-type: none"> • Restrict or prohibit vehicle movements during times of increased fire risk/ total bans. • All vehicles must be fitted with fire extinguishers. • Plant and vehicles operating over or through uncleared vegetation must be fitted with appropriate exhaust systems positioned or covered so that the vegetation cannot come into contact with the exhaust system. 	<p>proposed action (Pre, during, and Post).</p> <p>Specific Monitoring Actions are prescribed in section 8.</p>
	Degradation of retained vegetation within the proposed action area	<ul style="list-style-type: none"> • Likelihood: Unlikely • Consequence: Minor • Risk Outcome: Low 	<ul style="list-style-type: none"> • Implementation of standard hygiene management practices. • Standard Construction management measures. 	<p>Monitoring will be undertaken during and post the implementation of the proposed action.</p>

5. Environmental Management

5.1 Management Objective

The overarching objective of this Plan is to ensure that activities attributable to the Project do not compromise the viability of the resident WRP population, including the home range for any individual WRPs.

5.2 Management Targets

Management targets are used to measure and report achievement against the management objective. **Table 4** outlines the specific management targets relevant to this report.

Table 4: Management Targets

Item	Details
Management Targets	Management Target 1: Avoid mortality of WRPs during construction.
	Management target 2: Avoid the removal and/or degradation of suitable habitat outside the approved clearing areas.
	Management target 3: No irreversible loss of habitat value or condition within the onsite conservation area.

5.3 Management Actions

Risk-based management actions have been identified to achieve the objective and targets of this Plan (**Table 5**). These management actions apply from pre-construction through construction and post-construction.

Table 5: Management Actions

Phase	Risk	Management/Mitigation Strategy	Responsibility
Pre-construction and site preparation	Habitat clearing	<ul style="list-style-type: none"> Prior to clearing, all trees designated for removal will be clearly identified. All WRP habitat that is to be retained within the subject will be surveyed and delineated with temporary fencing prior to site works to ensure it is conserved. Set up dreys and watering points in adjacent habitat prior to clearing WRP habitat and remove dreys prior to clearing where accessible. Vacant tree hollows suitable for WRP are to be inspected, if unoccupied these hollows are to be blocked prior to clearing where they are accessible, to prevent individuals entering. Infrared scanning of hollows to be implemented, to confirm vacancy. 	<ul style="list-style-type: none"> Environmental manager and Contractor
	Mortality of WRP	<ul style="list-style-type: none"> Spotlighting of potential WRP habitat will be undertaken by a suitably experienced person/s for two nights immediately prior to clearing. If WRP are observed within the designated clearing area in the nights prior, efforts to move the individual/s shall be undertaken in accordance with fauna handling procedures below: <ul style="list-style-type: none"> Fauna handling will only be conducted by a suitably experienced persons i.e. zoologist / fauna spotter, with appropriate legislative authorisations (e.g. s40 under the Biodiversity Conservation Act 2016). Any individuals spotted the night prior to clearing will be relocated to the nearest location within the Conservation Area Any WRP showing signs of injury or illness will be caught, bagged and taken to an experienced veterinarian. If an injured WRP has not already been captured, then the appointed fauna-spotter must attempt to capture the animal for the purposes of veterinary assessment and treatment. All treatment of injured fauna will be undertaken by a veterinarian. 	<ul style="list-style-type: none"> Environmental manager and Contractor
	Impacts to fauna in adjacent habitat	<ul style="list-style-type: none"> Install appropriate fencing adjacent to the designated habitat retention areas to limit/ prevent unauthorised access to the conservation area. To limit the likelihood of individuals within the retention area entering the clearing area, fencing should be 1.5 m high and constructed to prevent possums being able to climb it or dig under it. 	<ul style="list-style-type: none"> Environmental manager and Contractor
Clearing and construction activities	Habitat clearing	<ul style="list-style-type: none"> Clearing to be conducted outside of the WRP breeding period (June to September) Directional clearing is to be undertaken as presented in Figure 5. No night-time clearing of vegetation will occur. Cleared vegetation will be chipped immediately or transported at least 100 m from suitable WRP habitat before further processing. Movement / disturbance of clearing stockpiles will be confined to the period one hour after sunrise and / or one hour prior to sunset. 	<ul style="list-style-type: none"> Environmental manager and Contractor
	Mortality of WRP	<ul style="list-style-type: none"> Fauna searches shall be conducted immediately prior to, during and immediately post clearing operations and will include hollows, dreys, ground debris, dense ground-level vegetation, fallen timber and logs. If WRP are observed during clearing operations, the tree containing the animal shall be left for up to 48 hours to allow for the animal to vacate, while clearing continues in adjacent vegetation. If the tree continues to be occupied after 48 hours, the animal will be coerced / moved to a safe area outside of the clearing footprint by the appointed zoologist / environmental scientist / fauna spotter. Trees, as noted above, that are observed to support WRP after 48 hours will be 'bumped gently' with a machine prior to felling. The operator and spotter will wait and observe the tree for a short time. If the animal remains in the tree it shall be pushed over slowly onto vegetation within the clearing area that is yet to be cleared. The 'soft felling' of habitat trees will provide a 'cushion' for the vegetation being felled, minimising the risk of injury to the animal and allowing any WRP present with the opportunity to safely vacate. Felled trees with hollows will be checked immediately for fauna after felling and prior to further processing. If it is not possible to fully inspect the hollow the tree will be left on the ground overnight to allow time for any undetected fauna to vacate. If habitat clearing is to be staged, commencing from existing edge lines / roads and progressing towards habitat that will be retained to direct WRP towards these areas. Where clearing operations abut existing roads, in addition to standard traffic management measures, visual message boards will be installed to warn drivers of the potential for fauna to cross the road during clearing operations. Construction workers are to report any WRP individuals seen during construction activities (post-clearing) to the appropriate supervisor. Suitably qualified vegetarian or wildlife carer should be informed of dates for clearing and be available to potentially receive any injured animals. <p>Fauna handling</p> <ul style="list-style-type: none"> Fauna handling will only be conducted by a suitably experienced persons i.e. zoologist / fauna spotter. Any WRP showing signs of injury or illness will be caught, bagged and taken to an experienced veterinarian. If an injured WRP has not already been captured, then the appointed fauna-spotter must attempt to capture the animal for the purposes of veterinary assessment and treatment. All treatment of injured fauna will be undertaken by a veterinarian. 	<ul style="list-style-type: none"> Environmental manager and Contractor
	Impacts to fauna in adjacent habitat	<ul style="list-style-type: none"> Construction activities (i.e. activities undertaken after clearing has been completed) adjacent to WRP habitat will only be undertaken during daylight hours. Construction personal should maintain awareness of the potential for individual WRP's to enter the construction. If the animal appears injured or showing signs of illness, fauna handling procedures detailed above are to be followed. 	<ul style="list-style-type: none"> Environmental manager and Contractor
	Ecological Corridor Maintenance	<ul style="list-style-type: none"> Possum rope bridge to be installed over Cape Naturaliste Road, that establishes safe connection between the retained conservation area and the adjacent Marri Conservation Reserve. 	<ul style="list-style-type: none"> Environmental manager and Contractor



Figure 5: Indicative Directional Clearing Diagram

	PROJECT/REPORT NAME Preliminary Documentation Lot 9020 Martingale Road, Dunsborough		Legend Proposed Action Area Disturbance Footprint Offset Area Indicative Clearing Direction	<table border="1"> <thead> <tr> <th>No</th> <th>Description</th> <th>Drawn</th> <th>Approved</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Original issue</td> <td>MD</td> <td>BH</td> <td>22/7/2025</td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No	Description	Drawn	Approved	Date	A	Original issue	MD	BH	22/7/2025															
	No	Description		Drawn	Approved	Date																							
A	Original issue	MD	BH	22/7/2025																									
SCALE 1:4,445	SHEET SIZE A3 COLOUR	CLIENT Dunsborough Joint Venture	NOTES: Cadastral boundary (LGATE-002). Label corresponds to the vegetation association number.																										
COORDINATE REFERENCE SYSTEM GDA2020 / MGA zone 50	PROJECT NUMBER A25.024	VERSION 0	 Western Environmental Pty Ltd 08 6244 2310 enquiries@westenv.com.au Level 3/25 Prowse St, West Perth WA 6005 westenv.com.au																										
DATA SOURCE LANDGATE AERIAL IMAGERY NOW	DRAWN BY / REVIEWED BY MD/BH	DATE 22/7/2025																											

5.4 Monitoring

The purpose of monitoring is to inform, through the management targets, if the environmental objectives are being achieved, and whether management actions need to be reviewed or revised.

Monitoring will be undertaken for each management target as detailed in **Table 6**. The method, location, parameters, and frequency of monitoring are specified. Early warning indicators provide advance warning that a management target may not be met. The monitoring results will be compared against these indicators, enabling actions to be taken to control the contributing processes so that the environmental objective can be met.

Table 6: Monitoring actions

Management Target	Risk	Monitoring Provisions			Early Warning Indicators
		Method	Location	Frequency	
Management target 1: Avoid mortality of WRPs during construction	Mortality of Conservation Significant Fauna	Visual inspection to review clearing boundaries and assess vegetation clearing	Within cleared areas containing native vegetation	Daily, prior to and after clearing during clearing operations	<ul style="list-style-type: none"> • Damage to fencing. • Clearing or disturbance of WRP habitat outside of the approved clearing area. • Unauthorised clearing of WRP habitat within the approved development envelope (e.g.Conservation area).
		Conduct walkover inspection of cleared areas and fallen trees for individuals of WRP	Within cleared areas containing native vegetation	Daily during clearing operations	<ul style="list-style-type: none"> • WRP injured or killed by site activities. • Unexpected observation of WRP on site.
		Visual inspection of vegetation stockpile areas	Vegetation stockpiles	Daily or as required prior to removal of vegetation stockpiles	<ul style="list-style-type: none"> • Encounter one or more live or injured conservation significant species in vegetation stockpiles.
Management target 2: Avoid the removal and/or degradation of suitable habitat outside the approved clearing areas.	Habitat Clearing outside of approved areas	Visual inspection to review clearing boundaries and assess vegetation clearing Visual inspection of fencing around conservation area	<ul style="list-style-type: none"> • Within cleared areas containing native vegetation. • Conservation area boundary. 	Daily during clearing operations	<ul style="list-style-type: none"> • Clearing or disturbance of WRP habitat outside of the approved works area. • Unauthorised clearing of WRP habitat within the approved Project area (e.g.Conservation area). • Damage to fencing.

Management target 3: No irreversible loss of habitat value or condition within the onsite conservation area.	Introduction of invasive weed species, dieback or other disturbing processes	<ul style="list-style-type: none"> • Visual assessment of adjacent habitat. • Conservation area condition survey. 	<ul style="list-style-type: none"> • Onsite conservation area. • Other adjacent offsite vegetation. 	<ul style="list-style-type: none"> • Daily during clearing operation. • Bi-annually during construction. • Once, following the implementation of the proposed action. 	<ul style="list-style-type: none"> • Presence of invasive species, dieback or other degrading processes noted within the onsite conservation area. • Reduction in vegetation condition by more than 25% of baseline, attributable to the proposed action.
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5.5 Adaptive Management and Corrective Actions

This Plan has been developed based on adaptive management. This approach aims to reduce impacts by embedding a cycle of monitoring, reporting, and implementing change. The Plan will be updated in response to changes in management practices, should they become apparent, and through learnings during the life of the Proposal.

Adaptive management allows this Plan to be flexible and respond to new or increased risks to WRP from impacts should they be identified. A key component of adaptive management is adequate early triggers and corrective actions. Should early triggers be met, appropriate corrective actions should allow for the impact to be addressed before an incident occurs. The application of appropriate corrective actions should then inform the management of the measures to ensure that there is no reoccurrence of events that led to triggers being met.

Corrective actions against each Management Target are outlined in **Table 7**.

Table 7: Corrective Actions

Management Target	Indicator	Early indicator	Corrective action
Management target 1: Avoid mortality of WRPs during construction	Mortality of Conservation Significant Fauna	<ul style="list-style-type: none"> • Damage to fencing. • Clearing or disturbance of WRP habitat outside of the approved clearing area. • Unauthorised clearing of WRP habitat within the approved development footprint (e.g. Conservation Area). 	<ul style="list-style-type: none"> • Stop works (temporary). • Record environmental incident. • Investigate cause. • Update environmental training of personnel (if appropriate). • Report incident to DCCEEW. • Undertake remediation works (if appropriate, following consultation with DBCA and / or DCCEEW).
		<ul style="list-style-type: none"> • WRP injured or killed by site activities 	<ul style="list-style-type: none"> • All clearing is immediately ceased. • Investigate cause of injury or loss. • Proponent to consult with DBCA and DCCEEW of the WRP injury or mortality occurring. • Revise clearing and construction measures consultation with DBCA to reduce likelihood of further WRP injury / mortality before work recommences. • Review induction material and Improve training and education for all personnel.
		<ul style="list-style-type: none"> • Unexpected observation of WRP on site 	<ul style="list-style-type: none"> • Stop works (temporary) within 50 m of the individual. • Engage a suitably experienced fauna handling specialist to remove individuals and transport the

Management Target	Indicator	Early indicator	Corrective action
		<ul style="list-style-type: none"> Encounter one or more live or injured conservation significant species in vegetation stockpiles 	<ul style="list-style-type: none"> individual to a native fauna care facility. Record environmental incident. Modify pre-clearing fauna survey methodology (if appropriate). Investigate cause of injury or loss. Proponent to consult with DBCA and DCCEEW of the WRP injury or mortality occurring. Revise clearing and construction measures consultation with DBCA to reduce likelihood of further WRP injury / mortality before work recommences. Review induction material and Improve training and education for all personnel.
<p>Management target 2: Avoid the removal and/or degradation of suitable habitat outside the approved clearing areas.</p>	<p>Habitat Clearing</p>	<ul style="list-style-type: none"> Clearing or disturbance of WRP habitat outside of the approved disturbance footprint. Unauthorised clearing of WRP habitat within the approved disturbance footprint (e.g. Conservation Area). Damage to fencing. 	<ul style="list-style-type: none"> Investigate cause and consult with DBCA and / or DCCEEW. Implement contingency actions which may include: <ul style="list-style-type: none"> Review practicality and relevance of management measures Improve and implement increased protective measures/controls as necessary. Repair / alter design of fencing to block vehicular access if required. Install additional signage. Monitor outcomes.
<p>Management target 3: No irreversible loss of habitat value or condition within the onsite conservation area.</p>	<p>Introduction of invasive weed species, dieback or other disturbing processes</p>	<ul style="list-style-type: none"> Presence of invasive species, dieback or other degrading processes noted within the onsite Conservation Area. Reduction in vegetation condition by more than 25% of baseline, attributable to the proposed action. 	<ul style="list-style-type: none"> Investigate cause and consult with DBCA and / or DCCEEW. Implement contingency actions which may include: <ul style="list-style-type: none"> Review practicality and relevance of management measures. Improve and implement increased protective measures/controls as necessary. Repair / alter design of fencing to block vehicular access if required. Install additional signage. Monitor outcomes.

6. Reporting, Audit and Review

6.1 Environmental Audit

The Proponent will engage a suitably qualified environmental auditor to ensure that the Plan is being implemented appropriately. Should an audit identify that the environmental actions or objectives are not being met, including non-compliance or an environmental incident, the Proponent will notify DCCEEW within seven days.

Prior to construction, the Proponents Environmental Manager will be responsible for undertaking a pre-clearing audit/inspection to ensure that all pre-clearing management actions have been implemented.

6.2 Reporting

The Proponent will report to DCCEEW on the implementation of this Plan in accordance with annual compliance reporting under the conditions of approval for the proposed action.

Should management targets be exceeded (or not met), investigations into exceedances will be investigated. Should injury or mortality to WRP individuals occur as a result of the proposed action, a report will be provided to DCCEEW within 60 days. This will include details on:

- The cause of failure to implement management actions and/or management targets to be exceeded.
- Findings of the investigation to determine potential environmental harm or alteration of the environment that occurred due to failure to implement management actions.
- Details of revised and/or additional management actions to be implemented to prevent exceedance of the management targets and/or ensure the implementation of management actions.
- Relevant changes to the Proposal activities.
- Measures implemented to prevent, control or abate environmental harm which may have occurred.

The proponent will actively work with the DCCEEW and other relevant stakeholders (e.g. DBCA) to review management actions following the outcomes of the investigation.

6.3 Environmental Review

This Plan adopts an 'adaptive management' approach which seeks to embed a cycle of monitoring, reporting and implementing change, where required. As part of this adaptive management, the Proponents Environmental Manager will undertake an annual review of this Plan. This Review will consider:

- The management and monitoring actions.
- Opportunities for an improvement in environmental performance (for example, changes to construction methodology or timing).
- Identify a need to update this Plan to capture changes to the management and/or monitoring actions.
- Identify any general need to update this Plan.

7. References

Biologic, 2022. Lot 9018 Martingale Road and Lot 377 Clinker Drive, Dunsborough. Western Ringtail Possum and Black Cockatoo Survey. Unpublished report prepared for Dunsborough Joint Venture.

DCCEEW. (2024). Environmental Management Plan Guidelines. Department of the Environment. Canberra, Australia.

DPaW. (2017). Western Ringtail Possum Recovery Plan. Perth, Western Australia: Department of Parks and Wildlife.

Western Environmental (2024). Targeted Western Ringtail Possum Survey 2023. Lot 9020 Martingale Rd and Lot 377 Clinker Drive. Unpublished report prepared for EDS Environmental.

Document Status

Rev No.	Author	Reviewer	Purpose	Approved for Issue
A	EDS Environmental	H Dykstra	Client Review	18/11/2022
B	EDS Environmental	DCCEEW	Regulator Review	22/11/2022
C	EDS Environmental	H Dykstra	Client Review	24/02/2025
1	EDS Environmental	DCCEEW	Response to Review	25/02/2025

Appendix A

WRP Survey (Biologic, 2022)

Appendix B

WRP Survey (Western Environmental, 2023)