



**Public Transport
Authority**

Thornlie-Cockburn Link

Offsets Additional Information Report

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Rev	Date	Author	Reviewer(s)	Description
A	25/06/2019	S. Brown	L. Zimmermann	Draft – first version
0	27/06/2019	S. Brown	M Ludlow	Final
1	31/07/2019	S. Brown	L. Zimmermann	Revision

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1. Introduction

1.1. Background

The Public Transport Authority's (PTA) Thornlie-Cockburn Link (TCL) Project (the project) was referred to the Environmental Protection Authority (EPA) on 7 June 2018. On 2 July, the EPA set the level of assessment for the proposal at Referral Information (s39A (2) (b) with Additional Information (s0 (2) (a)). The preliminary key environmental factors were: Flora and Vegetation, Terrestrial Environmental Quality, Terrestrial Fauna, Hydrological Processes, Inland Waters and Social Surroundings. The Proposal, herein referred to as the project, is currently being assessed by the EPA. The Commonwealth Department of the Environment and Energy (DoEE) is also assessing the project under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The project comprises construction of a 14.5 kilometre (km) new dual railway track within existing railway and road reserves, to extend the existing Thornlie spur line to Cockburn Central Station as well as the duplication of 3 km of railway track between Beckenham Junction and Thornlie train station. The project also includes the following:

- Construction of two new stations: Ranford Road Station and Nicholson Road Station;
- Modification of two existing stations: Thornlie Station and Cockburn Central Station; and
- Modifications to one rail bridge, two road bridges and the grade separation of a pedestrian crossing.

Following consideration of proposed impact avoidance, minimisation and mitigation measures, predicted significant residual environmental impacts from the implementation of the project will be offset.

The PTA has developed the offset requirements in accordance with the WA Environmental Offsets Policy (Government of Western Australia, 2011); WA Environmental Offsets Guidelines (Government of Western Australia, 2014) and the EPBC Act Environmental Offsets Policy (Australian Government, 2012).

1.2. Objective

The objective of this report is to respond to public comments about environmental offsets by providing additional information to address and clarify how the proposed environmental offsets for the clearing of Threatened Ecological Communities, wetlands and Threatened fauna habitats associated with the project are valid, given the proposed offset sites are already protected and management is already being applied.

1.3. Scope

The scope of this report is to provide additional information regarding the specific issues raised with regard to the proposed offsets strategy for the project with reference to the Western Australian and Commonwealth Environmental Offsets Policy and Guidelines.

2. METRONET Offsets Strategy

2.1. Role of Government Agencies

The Department of Biodiversity, Conservation and Attractions (DBCA) has internal resources responsible for identifying and purchasing parcels of land to offset significant residual environmental impacts of development projects. The PTA has been consulting with the DBCA since early planning of the project. As the TCL project is a Western Australian (WA) State Government project, the WA Department of the Premier and Cabinet (DPC) and the Western Australian Planning Commission (WAPC) have been assisting the PTA with identifying potential land parcels suitable for acquisition and/or management to offset significant residual environmental impacts. Both WAPC and DPC have also been assisting the PTA with identifying potential land parcels suitable for acquisition and/or management for other METRONET rail infrastructure projects.

Two privately-owned Bush Forever sites zoned Rural Complimentary were identified by the WAPC as suitable sites for strategic purchase to use to offset future WA Government project impacts related to the Strategic Assessment.

These two sites include a land parcel on Lowlands Road in Mardella (referred to as “Lowlands”), comprising a total of approximately 1,138 ha (Bush Forever Site 368) and a land parcel in Keysbrook (referred to as “Keysbrook”), comprising approximately 257 ha (Bush Forever Site 77) and are discussed in detail in the following sections.

2.1.1 Lowlands

In 2012, the Western Australian State Government consulted with the then Commonwealth Department of Sustainability, Environment, Water, Population and Communities (DSEWPAC, now known as DoEE) advising of their intention to purchase Lowlands due to its suitability for offsetting environmental impacts associated with the Strategic Assessment. The State sought formal Commonwealth acknowledgement that the transfer to public ownership for conservation purposes would represent a significant conservation gain as part of future environmental offsets package for the Strategic Assessment.

DSEWPAC agreed in principle that Lowlands could form part of an overall offsets package in the Matters of National Environmental Significance (MNES) Plan being developed as part of the Strategic Assessment. DSEWPAC also acknowledged that the Commonwealth Offsets Policy (Australian Government, 2012) allows ‘advanced offsets’ where the offset is secured before the impact of an action(s) occurs.

Following this advice Lowlands was purchased by the WAPC in 2014. A portion of the site was used to offset a separate WA Government project in 2015 and as part of this process, the Class ‘A’ conservation reserve status was applied to Lowlands. Elevation of conservation status to Class A was conducted in 2015 for urgent management reasons and to honour the agreement made with the former private landowner.

Although the Strategic Assessment is currently on hold pending a review, the environmental impacts of the METRONET rail infrastructure projects were included in the original Strategic Assessment calculations. Therefore in 2019, the balance of Lowlands that had not been applied as an offset (i.e. 1,138 ha) was considered as a proposed offset for METRONET projects. Allocation of the remainder of Lowlands to offset significant residual environmental impacts of METRONET rail infrastructure projects aligns with the:

- In principle State and Commonwealth Lowlands purchase agreement made in 2012.
- The State's original intention to purchase Lowlands as an advanced offset to offset significant residual environmental impacts of projects included within the Strategic Assessment.
- WA Environmental Offsets Guidelines (Government of Western Australia 2014) "pre-impact" offsets guidelines (as discussed in Section 3.1 below).
- Commonwealth Offsets Policy (Australian Government, 2012) advanced offsets policy (as discussed in Section 3.2 below).
- Government of Western Australia (2014) and Australian Government (2012) guidance to identify and assess and the suitability and appropriateness of proposed direct offsets (as discussed in Section 4 below).

A number of vegetation surveys have been conducted of the site and the known environmental values include:

- Black Cockatoo foraging habitat (likely to include Carnaby's, Forest Red-tailed and Baudin's Black Cockatoo foraging habitat).
- Black Cockatoo potential breeding habitat.
- Banksia Woodlands of the Swan Coastal Plain TEC.
- *Caladenia huegelii* habitat.
- Wetlands.
- Threatened flora.
- Other TECs or PECs.

2.1.2 Keysbrook

The Keysbrook site is located within Bush Forever Site 77 and was acquired by the WAPC in June 2018. Keysbrook was purchased with the intention to use the site to offset future WA Government project significant residual environmental impacts and through consultation with the WAPC, was allocated to METRONET and the TCL project in 2019. The site is zoned Rural Complimentary and is intended to be transferred to Parks and Recreation to increase its conservation status and significance.

Environmental values have not been surveyed nor confirmed; however, based on desktop assessments, the site contains approximately 173 ha of vegetation and conservation category wetlands including Yangedi Swamp, likely Banksia Woodland and Black Cockatoo habitat and known TEC habitat. The PTA has engaged a consultant to conduct an environmental survey of the site to assess and map environmental values. This information will be considered in the application and quantification of Keysbrook directly offsetting project environmental impacts.

3. Application of State and Commonwealth Advanced Offsets Policies

3.1. State Offset Guidelines

The WA Environmental Offsets Guidelines (Government of Western Australia 2014) includes a “Pre-impact” offsets strategic approach which involves proponents or applicants delivering the offset prior to project approval. Application of the WA Environmental Offsets Guidelines “Pre-impact” offsets strategic approach to Lowlands and Keysbrook is summarised in Table 1 (Government of Western Australia 2014).

3.2. Commonwealth Offset Policy

The EPBC Act Environmental Offsets Policy (Australian Government 2012) includes an ‘advanced offsets’ approach which is a supply of offsets for potential future use, transfer or sale. Application of the EPBC Act Environmental Offsets Policy (Australian Government 2012) advanced offsets approach to Lowlands and Keysbrook is summarised in Table 2.

Table 1: Application of the WA Environmental Offsets Guidelines (Government of Western Australia 2014) Pre-impact Offsets to Lowlands and Keysbrook

WA Environmental Offsets Guidelines (Government of Western Australia 2014) Pre-impact” offsets requirement	Application to METRONET - Lowlands	Application to METRONET - Keysbrook
<p>Early offsets can either be initiated ahead of time where a proponent or applicant has multiple projects that it believes will require offset, or where a proponent or applicant acquires land that is larger than required for its offset.</p>	<p>The Strategic Assessment included a series of State Government projects likely to require offsets including the METRONET program of works to be implemented by the PTA.</p> <p>In 2012, prior to the commencement of the METRONET program of works, the WAPC were offered the opportunity to acquire Lowlands, a very large site, to offset significant residual environmental impacts of the Strategic Assessment projects.</p> <p>A portion of Lowlands was used to offset a State Government project in 2015, with the balance of the site still available for future offset use.</p>	<p>Keysbrook was purchased in 2018 by the WAPC to offset future government projects.</p>
<p>Excess land could be managed for conservation and used on a future project or sold to another proponent or applicant requiring an offset.</p>	<p>A portion of Lowlands was used to offset a State Government project in 2015, with the balance of the site still available for future offset use.</p> <p>Lowlands has been managed for conservation by the DBCA since 2015 and is proposed to be used to counterbalance significant residual environmental impacts from future METRONET projects, including the TCL project.</p>	<p>Keysbrook was purchased by the WAPC in 2018 for the purpose of offsetting future State Government project impacts and to date has not been applied to a project. The WAPC intends to sell purchased land to Government applicants requiring an offset.</p>
<p>Anyone seeking to undertake an early offset should discuss this with the appropriate agency ahead of time. It must be recorded that a particular site is being managed as an early offset.</p>	<p>As discussed in Section 2.1 of this report, the DPC discussed the proposed use of Lowlands as an early offset with the State and Commonwealth Government, prior to purchasing the site.</p> <p>Further, the PTA has more recently (2019) consulted with EPA Services, the DBCA, WAPC, DPC and the</p>	<p>The PTA has recently consulted with EPA Services, the DBCA, WAPC, the DPC and the Commonwealth regarding the proposed use of Keysbrook to offset the project’s significant residual environmental impacts. The State Government departments have provided informal in principle support for Keysbrook to be used to offset METRONET projects. The PTA is currently seeking</p>

WA Environmental Offsets Guidelines (Government of Western Australia 2014) Pre-impact” offsets requirement	Application to METRONET - Lowlands	Application to METRONET - Keysbrook
	<p>Commonwealth regarding the proposed use of Lowlands to offset the project’s significant residual environmental impacts. The State Government departments and the DoEE have provided informal in principle support for Lowlands to be used to offset METRONET projects. The PTA is currently seeking State and Commonwealth written endorsement and approval of the draft TCL Offsets Strategy.</p>	<p>State and Commonwealth written endorsement through approval of the draft TCL Offsets Strategy.</p>
<p>An early offset will not be automatically accepted, but the proponent or applicant must demonstrate how the offset counterbalances the significant residual impact of the project.</p>	<p>The PTA has demonstrated how the proposed offset counterbalances the significant residual impacts of the TCL project within the draft Offsets Strategy, included within the TCL Referral Information with Additional Information (Aurora Environmental, 2019).</p>	

Table 2: Application of EPBC Act Environmental Offsets Policy (Australian Government 2012) Advanced Offsets Approach to Lowlands and Keysbrook

EPBC Act Environmental Offsets Policy advanced offsets requirement.	Application to METRONET - Lowlands.	Application to METRONET - Keysbrook
<p>An advanced offset includes protection or improvement of habitat for the conservation of a protected matter before an impact is undertaken.</p>	<p>The State's acquisition of Lowlands in 2014 and transfer to a Class A Reserve in 2015 resulted in the direct protection of habitat for the conservation of a number of MNES including Banksia Woodlands of the SCP habitat, Black Cockatoo habitat and TEC habitat including that for <i>Caladenia huegelii</i>. The DBCA's ongoing management of this site has resulted in habitat improvement of the site's environmental values including listed MNES habitat. This action occurred simultaneously with a separate adjacent lot within the original purchased Lowlands site being applied as an offset to counterbalance another State Government project. In accordance with the original State and Commonwealth 2012 arrangement, it was the intention for the majority of Lowlands, the larger remaining lot, to offset future State Government projects under the Strategic Assessment. This aligns with the concept that the protection, conservation and improvement of habitat within Lowlands occurred before an impact was undertaken. Applying the Class A conversation status to the site in 2015, prior to an impact being undertaken and utilising the site as an offset was an urgent and strategic decision initiated by the State to protect conservation significant habitat.</p>	<p>By the State purchasing Keysbrook in 2018, protection of habitat for the conservation of a protected matter has been applied to the site through the removal of direct and indirect impact risks associated with a private landholder owning a Bush Forever site. State acquisition of privately-owned Bush Forever improves long-term environmental benefit as in accordance with State Planning Policy 2.8 (WAPC, 2010), private owner conservation management of Bush Forever is incentivised and not mandatory.</p> <p>This occurred before the impact occurred.</p> <p>Further protection is intended to be applied to Keysbrook through the offset process by transferring zoning to Parks and Recreation and applying ongoing management measures to the site for a period of seven years.</p>
<p>Proponents or offset providers looking to establish advanced offsets should discuss these with the department at the earliest possible opportunity.</p>	<p>As discussed in Section 2.1 of this report, in 2012, the DPC discussed the proposed use of Lowlands as an Advanced offset with the State and Commonwealth, prior to purchasing the site.</p>	<p>The PTA has recently consulted with EPA Services, the DBCA, WAPC, the DPC and the Commonwealth regarding the proposed use of Keysbrook to offset the project's significant residual environmental impacts. The State Government</p>

EPBC Act Environmental Offsets Policy advanced offsets requirement.	Application to METRONET - Lowlands.	Application to METRONET - Keysbrook
	<p>Further correspondence regarding the original 2012 arrangement and proposed use of Lowlands to offset project impacts including to MNES has been conducted with the Commonwealth in 2019. The State Government departments and the DoEE have provided informal in principle support for Lowlands to be used to offset METRONET projects, with the PTA currently seeking State and Commonwealth written endorsement and approval of the draft TCL Offsets Strategy.</p>	<p>departments have provided informal in principle support for Keysbrook to be used to offset METRONET projects. The PTA is currently seeking State and Commonwealth written endorsement through approval of the draft TCL Offsets Strategy.</p>
<p>Proponents should monitor and record baseline data associated with the establishment of the offset and improvements over time.</p>	<p>The DBCA have been responsible for the management of Lowlands since it became a Class A conservation reserve in 2015. The DBCA have assessed the environmental values of the site and conducted environmental surveys to establish the baseline condition of certain values. The DBCA have undertaken regular management activities and monitoring to assess improvements in vegetation condition and environmental values over time. These documents and reports have been provided to the PTA and included in the PTA's assessment of the suitability of the proposed offset.</p> <p>The PTA have engaged a consultant to conduct an environmental survey of the site to assess the extent and location of environmental values based on the site's current condition. The survey will assess and map vegetation type and condition and assess and map Black Cockatoo habitat areas including breeding trees (as a minimum). This survey information will form the PTA's environmental baseline and the basis for</p>	<p>The PTA have engaged a consultant to conduct an environmental survey of the site to assess the extent and location of environmental values based on the site's current condition. The survey will assess and map vegetation type and condition and assess and map Black Cockatoo habitat areas including breeding trees (as a minimum). This survey information will form the PTA's environmental baseline and the basis for establishing ongoing environmental management activities funded by the PTA under the TCL Offset Strategy. The baseline will also be used to assess improvements to Keysbrook due to management activities undertaken over seven years focussing on environmental values directly impacted by the project.</p>

EPBC Act Environmental Offsets Policy advanced offsets requirement.	Application to METRONET - Lowlands.	Application to METRONET - Keysbrook
	<p>establishing ongoing environmental management activities funded by the PTA under the TCL Offset Strategy. The baseline will also be used to assess Lowland's improvements due to management activities undertaken over seven years focussing on environmental values directly impacted by the project.</p>	
<p>Advanced offsets must satisfy all requirements in this policy, including those relating to offsets being additional to other legislation and schemes, as outlined in section 7.6. It is important to note that advanced offsets do not in any way prejudice the outcome of any future assessment of an action. That is, while planning advanced offsets may result in lower overall offset requirements, it does not influence whether or not an action referred under the EPBC Act will be determined as acceptable.</p>	<p>The PTA has demonstrated how the proposed offset counterbalances the significant residual impacts of the project within the draft Offsets Strategy within the TCL Referral Information with Additional Information (Aurora Environmental, 2019).</p>	

4. Assessment of Suitability and Appropriateness of Offsets

4.1. State Offset Policy

The PTA has demonstrated in its environmental impact assessment document (Aurora Environmental 2019) how it will avoid and minimise its significant environmental impacts for the project.

Application of relevant WA Environmental Offset Policy (Government of WA, 2011) offset principles to assess the suitability and appropriateness of Lowlands and Keysbrook is summarised in Table 3.

4.2. Commonwealth Offsets Policy

Application of relevant EPBC Act Environmental Offsets Policy (Australian Government 2012) offset requirements to assess the suitability and appropriateness of Lowlands and Keysbrook is summarised in Table 4.

Table 3: Application of relevant WA Environmental Offset Policy (Government of WA, 2011) offset principles to assess the suitability and appropriateness of Lowlands and Keysbrook

WA Environmental Offset Policy (Government of WA, 2011) Offset Principle	Application to METRONET - Lowlands.	Application to METRONET - Keysbrook
<p>Principle 3 of the WA Environmental Offset Policy (Government of WA 2011) states that environmental offsets will be cost-effective, as well as relevant and proportionate to the significance of the environmental value being offset.</p>	<p>In considering the guidance provided in the WA Environmental Offset Policy (Government of WA 2014) when applying Principle 3 and identifying an appropriate offset, Lowlands:</p> <ul style="list-style-type: none"> • Environmental values are in equal or better condition and have less disturbance compared with the impacted environmental values. • Contains habitat structure as similar as possible to undisturbed examples of the vegetation type to be impacted – namely Banksia Woodlands of the Swan Coastal Plain TEC, Low lying <i>Banksia attenuata</i> woodlands or shrublands Priority Ecological Community (FCT21c) (PEC) and <i>Caladenia huegelii</i> habitat with further environmental surveys scheduled to provide extent and condition. • Likely contains the same environmental values as the other residual significant environmental impacts of the project including Carnaby’s, Forest Red-tailed and Baudin’s Black Cockatoo foraging and potential breeding habitat, Bush Forever and Conservation and Resource Enhancement wetlands. Environmental surveys are scheduled to provide verification and condition. • Contains other regionally significant bushland, TECs/PECs, Threatened flora species, Quenda habitat and a portion of the Serpentine River. • Is located in the same Swan Coastal Plain bioregion 	<p>An environmental survey will be conducted to assess the site’s environmental values, structure, condition and suitability to offset the significant residual impacts of the project and application of Principle 3 of WA Environmental Offset Policy (Government of WA, 2011) and WA Environmental Offsets Guidelines (Government of WA, 2014).</p> <p>In considering the guidance provided in the WA Environmental Offset Policy (Government of WA 2014) when applying Principle 3 and identifying an appropriate offset, Keysbrook:</p> <ul style="list-style-type: none"> • Likely contains the same environmental values as the residual significant environmental impacts of the project including likely Carnaby’s, Forest Red-tailed and Baudin’s Black Cockatoo foraging and potential breeding habitat, Bush Forever and Conservation and Resource Enhancement wetlands. Environmental surveys are scheduled to provide verification and condition. • Contains other regionally significant bushland, TECs/PECs. • Is located in the same Swan Coastal Plain bioregion as the project. • Will be managed by the DBCA through funding provided to and agreed by the DBCA. Funding

WA Environmental Offset Policy (Government of WA, 2011) Offset Principle	Application to METRONET - Lowlands.	Application to METRONET - Keysbrook
	<p>as the project.</p> <ul style="list-style-type: none"> Will continue to be managed by the DBCA through additional funding provided to and agreed by the DBCA. Funding and on-ground management will be directed to the environmental values specifically being offset and areas of vegetation in Degraded condition to ensure future management works are over and above the current site management works, to reduce existing threatening processes and improve vegetation condition. Historical State acquisition and transfer to Class A has secured placed long-term conservation of the site. <p>An environmental survey will be conducted to assess the site's environmental values, suitability to offset the significant residual impacts of the project and application of Principle 3 of WA Environmental Offset Policy (Government of WA, 2011) and WA Environmental Offsets Guidelines (Government of WA, 2014).</p>	<p>and on-ground management will be directed to the environmental values specifically being offset and areas of vegetation in Degraded condition to ensure future management works are over and above the current site management works, to reduce existing threatening processes and improve vegetation condition.</p> <ul style="list-style-type: none"> Rezoning of the site to Parks and Recreation will place long-term conservation to the site.
<p>Principle 4 of WA Environmental Offset Policy (Government of WA, 2011) states that environmental offsets will be based on sound environmental information and knowledge.</p>	<p>When applying Principle 4, by considering guidance provided in the WA Environmental Offsets Guidelines (Government of WA, 2014) that requires demonstration of how a proposed offset counterbalances the project's significant residual impact and delivers long-term environmental benefits:</p> <ul style="list-style-type: none"> The draft TCL Offset Strategy within Aurora Environmental (2019) demonstrates how the environmental values within Lowlands counterbalances the project's significant residual impact with further information to be provided in the 	<p>When applying Principle 4, by considering guidance provided in Government of WA (2014), the draft TCL Offset Strategy within Aurora Environmental (2019) demonstrates how the environmental values within Keysbrook counterbalances the project's significant residual impact with further information provided in the final version of the Strategy.</p> <p>Keysbrook delivers long-term environmental benefit as:</p>

WA Environmental Offset Policy (Government of WA, 2011) Offset Principle	Application to METRONET - Lowlands.	Application to METRONET - Keysbrook
	<p>final version of the Strategy.</p> <ul style="list-style-type: none"> • Lowlands delivers long-term environmental benefit as: <ul style="list-style-type: none"> ○ The site was a privately-owned Bush Forever property that was purchased by the WA State Government. In alignment with the WA Environmental Offsets Guidelines (Government of WA, 2014) transition of land from freehold to Crown, regardless of whether the site is Bush Forever, places an additional level of protection on the site that would not occur should the land remain in private ownership. This level of protection was initiated by the WAPC's purchase of the site and would not have occurred without a State Government transaction occurring. State acquisition of privately-owned Bush Forever improves long-term environmental benefit as in accordance with State Planning Policy 2.8 (WAPC, 2010), private owner conservation management of Bush Forever is incentivised and not mandatory. ○ The Class A status applied to the site under the WAPC purchase arrangement has placed the highest level of conservation protection to the site at the earliest opportunity, which further increases the site's level of protection. Application of a Class A rating may not have occurred without the WAPC transaction occurring. ○ Provision of funding to the DBCA for seven 	<ul style="list-style-type: none"> • The Keysbrook site was privately owned Bush Forever property that was purchased by the WA State Government. Transition of land from private ownership to Crown, regardless of whether the site is Bush Forever, places an additional level of protection on the site that would not occur should the land remain in private ownership. This level of protection was initiated by the WAPC's purchase of the site and would not have occurred without a State Government transaction occurring. State acquisition of privately-owned Bush Forever improves long-term environmental benefit as in accordance with State Planning Policy 2.8 (WAPC, 2010), private owner conservation management of Bush Forever is incentivised and not mandatory. • The proposal to transfer zoning from 'Rural Complimentary' to 'Parks and Recreation' will further secure long-term environmental conservation of the site. This is proposed to occur as part of the TCL project offset strategy and has not yet been undertaken. • The WAPC intends to transfer management of the site to the DBCA. Under the TCL Offset Strategy, it is proposed that the DBCA manage the site initially for a period of seven years, with funds provided by the PTA. Management measures provided by the DBCA under PTA funding would be a major enhancement to the

WA Environmental Offset Policy (Government of WA, 2011) Offset Principle	Application to METRONET - Lowlands.	Application to METRONET - Keysbrook
	<p>years of management intends to prolong and enhance the current management arrangement and activities undertaken by the DBCA.</p>	<p>current management activities conducted by the WAPC annually, which is restricted to fire and weed management.</p>

Table 4: Application of relevant EPBC Act Environmental Offsets Policy (Australian Government, 2012) offset requirements to assess the suitability and appropriateness of Lowlands and Keysbrook

EPBC Act Environmental Offsets Policy (Australian Government, 2012) requirement	Application to METRONET - Lowlands	Application to METRONET - Keysbrook
<p>7.1 Suitable offsets must deliver an overall conservation outcome that improves or maintains the viability of the protected matter.</p> <p>AND</p> <p>7.6 Suitable offsets must be additional to what is already required, determined by law or planning regulations, or agreed to under other schemes or programs.</p> <p>Offsets must deliver a conservation gain for the impacted protected matter, and that conservation gain must be new, or additional to what is already required by a duty of care or to any environmental planning laws at any level of government.</p>	<p>The State’s acquisition of Lowlands in 2014 and transfer to a Class A Reserve in 2015 resulted in the direct protection of habitat for the conservation of a number of MNES including Banksia Woodlands of the SCP habitat, Black Cockatoo habitat and TEC habitat including that for <i>Caladenia Huegelii</i>. The DBCA’s ongoing management of this site has resulted in habitat improvement of the site’s environmental values including listed MNES habitat.</p> <p>Without the Commonwealth agreeing in 2012 that Lowlands can be used as an Advanced Offset, the site would not have been purchased by the State for conservation and the past four years of environmental management, Class A conservation status and improvement in site condition would not have occurred. The State’s acquisition also removed the risk private ownership of Bush Forever presents, as private owner implementation of conservation initiatives is not mandatory (WAPC, 2010).</p> <p>Therefore, Lowlands has delivered an overall conservation outcome that improves and/or maintains the viability of a number of MNES including Banksia Woodlands of the SCP TEC habitat, Black Cockatoo habitat and <i>Caladenia huegelii</i> habitat. Application of Lowlands to METRONET will also directly contribute to the ongoing viability of the protected matter impacted</p>	<p>The State’s acquisition of the privately-owned Keysbrook site placed an additional level of protection on the site that would not occur should the land remain in private ownership. State acquisition of privately-owned Bush Forever improves long-term environmental benefit as in accordance with State Planning Policy 2.8 (WAPC, 2010); private owner conservation management of Bush Forever is incentivised and not mandatory.</p> <p>The proposal to transfer zoning from ‘Rural Complimentary’ to ‘Parks and Recreation’ will place further long-term environmental conservation to the site. This is proposed to occur as part of the TCL project offset strategy and has not yet been undertaken.</p> <p>The WAPC intends to transfer management of the site to the DBCA. Under the TCL Offset Strategy, it is proposed that the DBCA manage the site initially for a period of seven years, with funds provided by the PTA. Management measures provided by the DBCA under PTA funding would be a major enhancement to the current management activities conducted by the WAPC annually, which is restricted to fire and weed management.</p> <p>Applying Keysbrook as an offset will directly contribute to the ongoing viability of the protected matter impacted by the proposed action and deliver an overall conservation outcome that improves or</p>

EPBC Act Environmental Offsets Policy (Australian Government, 2012) requirement	Application to METRONET - Lowlands	Application to METRONET - Keysbrook
	<p>by the proposed action and deliver an overall conservation outcome that improves or maintains the viability of the protected matter as compared to what is likely to have occurred under the status quo. This is because funding and on-ground management proposed under the Offset Strategy will be directed to the environmental values specifically being offset and areas of vegetation in Degraded condition. This will ensure future management works are over and above the current site management works, reduce existing threatening processes and improve vegetation condition.</p>	<p>maintains the viability of the protected matter as compared to what is likely to have occurred under the status quo.</p> <p>Funding and on-ground management proposed under the Offset Strategy will be directed to the environmental values specifically being offset, and areas of vegetation in Degraded condition to ensure future management works are over and above the current site management works. This will reduce existing threatening processes and improve vegetation condition.</p>
<p>7.2.1 Tenure for direct offsets</p> <p>For direct offsets, the securing of existing unprotected habitat as an offset only provides a conservation gain if that habitat was under some level of threat of being destroyed or degraded, and as a result of offsetting, will instead be protected in an enduring way and actively managed to maintain or improve the viability of the protected matter.</p>	<p>Securing Lowlands provides a conservation gain as:</p> <ul style="list-style-type: none"> • Lowlands was a privately-owned property and reserved Bush Forever Site that was in private ownership. In alignment with Government of WA (2014) transition of land from freehold to Crown, regardless of whether the site is Bush Forever, places an additional level of protection on the site that would not occur should the land remain in private ownership. This level of protection was initiated by the WAPC's purchase of the site and would not have occurred without a State Government transaction occurring. • The Class A status applied to the site under the WAPC purchase arrangement has placed a higher level of conservation protection to the site, which further increases the site's 	<p>Securing Keysbrook provides a conservation gain as Keysbrook was a privately owned property reserved as a Bush Forever Site. Transition of land from private ownership to Crown, regardless of whether the site is Bush Forever, places an additional level of protection on the site that would not occur should the land remain in private ownership. This level of protection was initiated by the WAPC's purchase of the site and would not have occurred without a State Government transaction occurring.</p> <p>The proposal to transfer zoning from 'Rural Complimentary' to 'Parks and Recreation' will further ensure long-term environmental conservation of the site and removes future risk of development occurring at the site. This is proposed to occur as part of the TCL project offset strategy and has not yet been undertaken.</p>

EPBC Act Environmental Offsets Policy (Australian Government, 2012) requirement	Application to METRONET - Lowlands	Application to METRONET - Keysbrook
	<p>level of protection on a long-term basis. Application of a Class A rating occurred at the earliest opportunity and would not have occurred without the WAPC transaction occurring.</p> <p>Lowlands will be actively managed to maintain and improve the viability of the protected matters through the provision of funding to the DBCA for seven years of management. This will prolong and enhance the current management arrangement and activities undertaken by the DBCA and present a greater conservation gain.</p>	<p>Keysbrook will be actively managed to maintain and improve the viability of the protected matters through the provision of funding to the DBCA for seven years of management. This will prolong and enhance WAPC's current management activities and present a greater conservation gain.</p>

5. Conclusion

The PTA considers that the information provided in this report demonstrates that the PTA has developed the project Offset Strategy in accordance with the WA Environmental Offsets Policy (Government of Western Australia, 2011); WA Environmental Offsets Guidelines (Government of Western Australia, 2014) and the EPBC Act Environmental Offsets Policy (Australian Government, 2012). The PTA's proposed use of Lowlands and Keysbrook sites to directly offset significant residual environmental impacts associated with the project complies with the above mentioned State and Commonwealth policy and guidance documents with respect to:

- Use of a State defined “pre-impact” offset and Commonwealth defined “advanced offset”.
- State offset principles to assess the suitability and appropriateness of direct offset sites.
- Commonwealth offset requirements to assess the suitability and appropriateness of direct offset sites.

The PTA will continue to consult with project stakeholders to agree and finalise the project Offset Strategy to deliver long term environmental benefits in counterbalance to the project's significant residual impacts.

6. References

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