



18 September 2016

Registrar@epa.wa.gov.au

Office of the Environmental Protection Authority
Locked Bag 10,
East Perth WA 6892

REFERRAL: LIMESTONE AND SAND QUARRY, LOT 1002 PRESTON BEACH ROAD,
NORTH PRESTON BEACH, SHIRE OF WAROONA

The Urban Bushland Council WA Inc. submits that the above proposal should be formally assessed under the Environmental Protection Act at the level of ARI (B) – environmentally unacceptable.

The significant environmental factors are:

1. Significance of proposal location

The referral documentation does not address the key environmental factor, which is **the intrinsic value of the area** within which this limestone and sand excavation proposal is situated, and the inevitable unacceptable damaging impact to these values. The referral information is inadequate.

2. Impacts on Yalgorup National Park

The impacts of such an activity on the integrity of the Yalgorup National Park are not addressed in the referral document. The proposed mine is surrounded by the National Park, and the harmful flow-on impacts to the Park are not given any consideration. These impacts are significant and cannot be ameliorated. Inspection of maps showing the location of Lot 1002 (as well as Lot 1001) sandwiched with Lake Clifton to the east and the coastal section of the National Park to the west makes obvious the vulnerability of the site.

Even the 1997 Coastal and Lakelands Planning Strategy, which has now been updated by more robust scientific information on the wetland and bushland values of the region, pointed out the problematic nature of enclaves of private land with the Yalgorup National Park and the *'increased difficulties and costs of management of these areas'*.

3. Presence of significant Tuart community

Tuart (*Eucalyptus gomphocephala*), which is endemic to the Swan Coastal Plain, has been extensively cleared for agriculture and urban development. In 2002 the Tuart Response Group provided advice to the Minister for the Environment, and a Tuart Atlas assessing the extent of Tuart communities was prepared. Yalgorup National Park was one of 3 areas where Tuart and remnants of Tuart communities are protected. The Yalgorup National Park's importance to ensuring the survival of Tuarts should not be under-estimated. It is estimated that before Europeans arrival there were more than 111,600 ha of Tuart woodlands and only 35% remain (Hopkins 1996). This percentage will be much lower now as this assessment was done 20 years ago. There has been a noticeable decline in the health and vitality of Tuart trees and the highest possible management measures, including compatible land uses abutting the Park, are needed.

It is notable also that Tuart woodlands have been nominated as a Threatened Ecological Community under the EPBC Act.

4. Hydrological threat to Ramsar wetlands

The risk to the internationally recognized Peel-Yalgorup Ramsar wetlands from this mining proposal has not been given appropriate consideration. It is difficult to understand how a proposal within a significant National Park and in proximity to a fragile and hydrologically complex chain of globally important wetlands could be overlooked. Mining and any associated dewatering to a depth of 16m will obviously have a significant impact on the hydrology of the adjacent lands which are in the Yalgorup National Park. The hydrology will be changed and this will affect the health of the plant communities and wetlands in the surrounding National Park.

It is remarkable that this impact has been overlooked in the referral document and we draw the attention of the EPA to this highly significant factor which is reason alone for the proposal to be declared environmentally unacceptable.

5. EPA advice in Report 1359, May 2010: Strategic Environmental Advice on Dawesville to Binningup Area under s 16(e) of EP Act.

This previous EPA advice to the Minister on the values of the region has been explicit in stating a presumption against development on the western side of the Yalgorup Lakes system and the coast. The EPA recommended the extension and consolidation of the Yalgorup National Park by incorporating private vegetated enclaves west of the Yalgorup lakes and other adjacent reserved lands. It pointed out that the Park contains vegetation complexes and fauna habitats not well represented outside of the study area, and that the National Park is unique, being the only conservation area on the Swan Coastal Plain containing extensive saltwater lake systems.

The EPA in its 2010 advice warned against subdivision and/or developments which change existing land uses and management systems, and the potential impacts on the lake ecosystems and changes to groundwater quality and quantity.

CONCLUSION

In conclusion, the amended proposal presents a real threat to the Yalgorup National Park and the Ramsar wetland system. It is inconsistent with the EPA's 2010 advice; inconsistent with determinations it has made on the basis of the 2010 advice on other proposals adjacent to this area; and inconsistent with the EPA's more recent Interim strategic advice on the Perth and Peel @ 3.5 million.

The EPA should clearly rule this proposal is incapable of being made environmentally acceptable, and thus be set at API (B).

Representatives of the Urban Bushland Council will appreciate the opportunity to further discuss these matters with you. Please leave a message at our office on 9420 7207.

President, Urban Bushland Council WA Inc.
PO Box 326 West Perth, WA 6872

ubc@bushlandperth.org.au

www.bushlandperth.org.au