



5<sup>th</sup> April 2022

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The Chairman, Prof. Matthew Tonts and Board  
Environmental Protection Authority  
Locked Bag No. 10  
JOONDALUP DC, WA 6919

Dear Professor Tonts,

**PROPOSAL: Limestone and Sand Excavation, Lots 1001 and 1002 Preston Beach Road North, Preston Beach – Public Environmental Review**

**Proponent: Moresreel Pty Ltd (trading as Doyles Lime Service)**

This proposal remains an unacceptable development on many environmental grounds including the significant STATE and NATIONAL environmental factors:

**1. Significance of proposal location**

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

**2. Impacts on Yalgorup National Park**

The impacts of such an activity on the integrity of the Yalgorup National Park are not adequately addressed. The proposed mine is surrounded by the National Park, and the harmful flow-on impacts to the Park are not given adequate 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 critically endangered 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 26 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.

In 2019 the Tuart woodlands and forests were declared a *critically endangered* Threatened Ecological Community under the Federal *EPBC Act*.

Extract: *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)* (s266B)

**Approved Conservation Advice** (incorporating listing advice) for the Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain ecological community (Page 43)

## 6.2 Priority conservation actions

This conservation advice identifies a range of priority actions to guide planning of activities to abate threats or assist recovery. The actions are grouped as follows:

PROTECT the ecological community to prevent further loss of extent and condition;

RESTORE the ecological community within its original range by active abatement of threats, re-vegetation and other conservation initiatives;

COMMUNICATE WITH AND SUPPORT researchers, land use planners, landholders, land managers, community members, including the Indigenous community, and others to increase understanding of the value and function of the ecological community and encourage their efforts in its protection and recovery.

RESEARCH to improve our understanding of the ecological community and the best methods to aid its recovery.

This list of actions has been included to provide guidance for

- planning, management and restoration of the ecological community by landholders or regional Natural Resource Management and community groups;
- determining conditions for any approved relevant controlled actions under national environment law; and
- prioritising activities in applications for Australian Government funding programs.

## 4. Hydrological threat to Ramsar wetlands

The risk to the internationally recognized Peel-Yalgorup Ramsar wetlands from this mining proposal has still 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. We again draw the attention of the EPA to this highly significant factor which is reason alone for the proposal to be declared environmentally unacceptable.

## 5. Presence of endangered Banksia Woodlands community

In 2016 the Banksia Woodlands of the Swan Coastal Plain were declared an *endangered* Threatened Ecological Community under the Federal *EPBC Act*.

EXTRACT: *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) (s 266B) Approved Conservation Advice* (incorporating listing advice) for the Banksia Woodlands of the Swan Coastal Plain ecological community (page 33)

<https://www.environment.gov.au/biodiversity/threatened/communities/pubs/131-conservation-advice.pdf>

The three key approaches to achieve the conservation objective are:

PROTECT the ecological community to prevent further loss of extent and condition;

RESTORE the ecological community within its original range by active abatement of threats, re-vegetation and other conservation initiatives;

COMMUNICATE WITH AND SUPPORT researchers, land use planners, landholders, land managers, community members, including the Indigenous community, and others to increase understanding of the value and function of the ecological community and encourage their efforts in its protection and recovery.

These approaches are overlapping in practice and form part of an iterative approach to management that should include research, planning, management, monitoring and review.

6. **Presence of endangered Black Cockatoos and Western Ringtail Possums**

The loss of habitat (roosting, feeding, breeding) is the single biggest threat to our fauna. The detail of the additional fauna research and reporting by 'Natural Area Management Consulting Services' was very disappointing as it did not include seasonal surveys, identify the importance of different sized hollows in habitat trees for also the *Critically Endangered Western Ringtail Possum* nor acknowledge that the value of habitat trees is not diminished if there was 'no one at home' when the surveys are done.

7. **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.

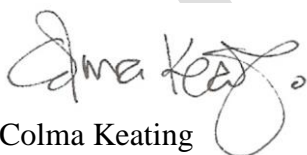
**CONCLUSION**

**In conclusion**, the proposal continues to present 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; inconsistent with the *EPBC Act* Threatened Ecological Communities and Threatened Species; inconsistent with ecological linkages; and inconsistent with the impacts of climate change.

**The EPA should clearly rule this proposal is incapable of being made environmentally acceptable.**

Representatives of the Urban Bushland Council will appreciate the opportunity to further discuss these matters with you. Contacts are: Colma Keating (Vice Chair) phone 0407 180 660 or Mary Gray (Committee) phone 9444 5647 or please leave a message at our office on 9420 7207.



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