

12th November 2022

https://consultation.epa.wa.gov.au/open-for-submissions/limestone-quarry-binningup-add-info/

Limestone Quarry, Lot 4 Binningup Road, Binningup

The Urban Bushland Council WA Inc. makes the following submission to the EPA.

The quarry will have multiple significant and irreversible environmental impacts as follows.

Peer-reviewed scientific evidence shows that excavating the Yalgorup Plain to extract underlying sedimentary limestone, is not acceptable. The site is an alluvial floodplain and this location is totally unsuitable for quarrying operations. Quarrying will remove the natural beach ridge of dune and limestone deposits, irrevocably altering the biodiversity of the Yalgorup Plain's vegetation, and the fauna it supports, and with an indirect impact on surrounding groundwater-dependent vegetation. Such disturbance will threaten the ecological and biodiversity values that act as a buffer to the wetlands. The significant impacts are listed below.

1. Groundwater and hydrology

Lot 4 Binningup Road lies within a system of geomorphic wetlands, Resource Enhancement Wetlands (REW), and Parkfield Drain, a protected waterway with linkages to the Leschenault Estuary. See the attached map which shows clearly how Lot 4 is surrounded by these wetland areas.

Lot 4 is hydrologically adjacent to and 'upstream' to these high conservation natural areas. Excavation and dewatering will alter the groundwater dynamics, which in turn affects groundwater-dependent ecosystems, impacting wetlands hydrologically and geomorphologically linked to Lake Preston and the Leschenault Estuary. These impacts will be irreversible due to the landscape changes resulting from mining. This is unacceptable.

2. Flora and vegetation

There will be indirect but significant impacts on flora and vegetation on surrounding lands. After mining and dewatering, the hydrologically downstream flora and vegetation assemblages will likely be degraded and decline with some species likely lost due to groundwater drawdown. Such changes cannot be effectively mitigated or offset. There will likely be significant impacts on some of the Tuart Forests and Woodlands of the Swan Coastal Plain critically endangered ecological community as listed under the federal EPBC Act. This is unacceptable.

3. Fauna

Endangered fauna species including the Western Ringtail Possum, Carnaby's Cockatoo, and herpetofauna will be at risk due to loss and/or degradation of their habitat in the native vegetation and wetland areas surrounding the proposed mine site.

This is unacceptable for these much valued endangered species.

4. Wetlands and waterways

Regionally significant wetlands and waterways, including Parkfield Drain and the Leschenault Estuary will be impacted. The changes in surface water levels and groundwater levels will be irreversible. The vegetated wetland ecosystems will be degraded with lower water levels.

5. Social impacts

The additional information provided by the proponent focuses on social impacts and planning matters. Surrounding residential areas will suffer impacts from emissions, dust, noise, light spill, and visual pollution. There will also be impacts on the Shire's Heritage Listed Springhill Homestead.

Limestone processing involves the onsite use of crushing and screening machinery. This processing involves machinery and noise (119 dB) from crushing material into select aggregate sizes, and significant levels of dust are a by-product of that process. The EPA recommends a buffer zone of at least 1000 metres between this type of industry and residential areas for good reasons of avoiding these unacceptable social impacts. The proposed mine area is closer than this from some existing residences.

Dust will impact not only residents' health and quality of life, but also impact soil and habitat vegetation, which includes Tuart/Jarrah woodlands on the site boundary.

The reliability of proposed methods to safeguard residents, especially Heritage listed Springhill Homestead and adjacent properties, from noise and dust emission lacks verifiable, scientific evidence as to their effectiveness. The reports provide no information as to efficacy of suggested safeguards.

Management and mitigation measures suggested by the proponent will not 'mitigate risk'. There will remain a net increase in environmental harm and environmentally unacceptable long-term impact if the quarry is approved. The excavated pit cannot be adequately restored or rehabilitated, and soil and alluvial functions will be altered, resulting in groundwater decline and vegetation decline well beyond the life of the quarry.

Alternative sources and reduced use of limestone

Sustainability issues relating to the use of basic raw materials should also be examined by the EPA. The cumulative impact of increased extractive industries in this area has not been assessed. Importantly, 'urgent demand' for limestone needed for construction of the Bunbury Outer Ring Road (BORR) is not justification for fast planning and environmental approval of this Limestone Quarry at Lot 4 Binningup Road.

CONCLUSION

The proposed limestone quarry on Lot 4 Binningup Road will have irreversible significant (indirect) environmental impacts on surrounding and downstream lands and wetlands, and on their flora, vegetation and fauna.

These irreversible impacts cannot be offset and the appropriate application of the mitigation hierarchy is to <u>avoid</u> such impacts. This means this environmentally unacceptable quarry should not be approved. Alternative but suitable sites for limestone mining should be found.

Thus the Urban Bushland Council WA Inc. strongly recommends that this Limestone Quarry not be approved.

<u>ATTACHMENT</u> showing the map of Lot 4 Binningup Road and its surrounds is on the next page.

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ATTACHMENT

Lot 4 Binningup Road is shown by the arrow below. The proposed Quarry lies within a system of geomorphic wetlands, Resource Enhancement Wetlands (REW), and Parkfield Drain, a protected waterway with linkages to Leschenault Estuary.

