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OBJECTION TO WORKS APPROVAL

W3210/2026/1

Neerabup Resource Recovery Precinct Stage 1

Lot 600, 570 Wattle Avenue, Neerabup WA

To Department of Water and Environmental Regulation (DWER)

Application reference Works Approval W3210/2026/1

Proponent City of Wanneroo

Site Lot 600, 570 Wattle Avenue, Neerabup WA

Submission type FORMAL OBJECTION

Clearing application is CPS [11015/1]

The City of Wanneroo is *'progressing the development of its long-term waste management strategy through the establishment of the Neerabup Resource Recovery Precinct (NRRS)....'* *'Future stages will incorporate an Energy Recovery Facility (ERF) and the private development of additional resource recovery and waste processing facilities in the northern proposition of NRRP....'* the City is *'just seeking approval for the Stage 1 proposed infrastructure only...'* (Referral)

Clearing request is *'approximately 8.92ha of degraded native vegetation.'*

Refer the proposal to the EPA

'The intention is to refer the proposal to the EPA; ('proposal is a 'significant proposal''')
(Referral)

The UBC agrees that the proposal must be referred to the EPA for an Environmental Impact Assessment. It is our understanding that both the Kwinana and Rockingham waste to energy projects were required to submit documents for a Public Environmental Review.

UBC request of DWER

The Urban Bushland Council WA Inc (UBC) request that DWER refuse this application for reasons given and numbered below, or determine that the Neerabup Resource Recovery Precinct proposal in both or all stages, is given the highest level of investigation through an Environment Impact Assessment. The fact that the proposal is being progressed in stages is concerning.

1.) Category

The category is stated as *'57 – Used tyre storage (general), 62 – Solid waste depot'*. The waste to energy incineration is proposed for a later stage but must be part of this assessment and not treated separately.

2.) Threatened Ecological Communities

The Referral document notes under *'Description'*, *'TECs within approximately half of the Stage 1 development area'*.

Banksia Woodlands of the Swan Coastal Plain is listed as endangered - that is it is facing a high risk of extinction in the near future. Even if patches *'do not meet the condition*

thresholds they may still retain important natural values and may be critical to protecting those patches that meet minimum thresholds’. (page 22 Conservation Advice approved 26 August 2016)

‘The conservation objective is to mitigate the risk of extinction of the Banksia woodlands of the SCP ecological community...’

The three key approaches to achieve the conservation objective are: protect the ecological community, restore the ecological community and to communicate with and support.... Although the Neerabup Resource Recovery Precinct proposal is admirable in its aims of waste recovery and associated matters, the protection of diminishing native vegetation and habitat for species must be respected and planned for.

3.) Flora and Vegetation

Inside the boundaries of the Site are two vegetation communities - *‘Eucalyptus tottiana and Nuysia floribunda mid mallee woodland’* and *‘Melaleuca preissiana and Eucalyptus rudis subsp. rudis mid woodland.’*

Talis Consulting states that TECs are within approximately half of the Stage 1 Development Area (after DBCAs database search). The UBC disagrees with Talis in its assessment that:

Due to the degraded condition of the entire vegetation on the Site and the good to very good condition of vegetation in the neighbouring areas it can be concluded that the vegetation within the Site is of low significance. (Talis page 9)

The vegetation on the site is part of a continuum that provides habitat for plants and animals. Environmental Sensitive Areas exist in association with the Site these being - Bush Forever site 38 State Forest 65 – Pinjar Plantation South Bushland Nowergup/Yanchep/Neerabup and BF site 382 Lake Pinjar and Adjacent Bushland, Pinjar. In an area that has been heavily cleared all native bushland is significant.

Professor Kingsley Dixon was reported in ABC Perth (7 October 2024) as saying; *‘The decline in banksia woodlands [has] now reached ‘catastrophic proportions’*

Christmas tree, Nuysia floribunda, is a culturally significant plant for Noongar people.

4.) Threatened and/or priority fauna

‘One threatened fauna species within Lot 600 north of Stage 1.’

‘Multiple threatened species recorded north, west and south of the Site.’ (Referral)

Potential Black Cockatoo Habitat

The UBC notes the sixteen Eucalyptus rudis and three Jarrah trees with the potential to provide breeding habitat for black cockatoos.

The Federal Department of Climate Change, Energy, the Environment and Water’s Assistant Director Elise Hardiker, has stated that:

‘Trees suitable to develop a nest hollow (potential nesting trees) are 300 to 500 mm (or greater) DBH’. (10/9/2024)

WEPL states: *‘No Potential or Known nesting trees were recorded within the Survey Area.’* (page iv) This advice is incorrect as potential nesting trees with a DCH of 300mm or greater

are considered nesting trees and there are 59 such trees recorded. (4.4.2 WEPL - no page numbers)

WEPL then states (p v) '*Fifty-nine Potential nesting trees were recorded within the Survey Area. Forty-four Potential future nesting trees were recorded within the Survey Area.*'

Eucalyptus rudis has the potential to develop hollows. A Eucalyptus rudis tree has been recorded as a nesting tree for pairs of Forest Red-tailed Black Cockatoo in Floreat in August 2021, December 2024, and January 2026. On the three occasions the fledgling was successful in having its first flight. (Margaret Owen - personal observation)

The Western Environmental Pty Ltd 'Basic Fauna and Targeted Black Cockatoo Habitat Assessment' was done in August 2024. Carnaby's Cockatoos leave the Swan Coastal Plain around June of each year to areas in the Wheatbelt to breed, returning around December/January. Thus, it is not surprising that no evidence of Carnaby's Cockatoos was found. This limitation was acknowledged. Black cockatoo foraging evidence (chewed banksia cones) was observed with the Survey Area – evidence that Carnaby's Cockatoo use the site. This aligns with expert advice that all banksias are significant as foraging food for Carnaby's Cockatoo.

Foraging habitat for Carnaby's is assessed as 'high' and for Forest Red-tailed Black Cockatoo as 'very high'. (p 35 Ecoscape – Environmental Assessment Portion 2)

Roost Sites

Three known roost sites are present 1km from the Survey Areas. (4.4.4 WEPL) Foraging habitat within 20 km of the roost site, as well as water availability is significant for the two species of black cockatoo and these conditions exist at this Site.

Forest Red-tailed Black Cockatoo

ATA Environmental's Basic Fauna Survey is out-dated. Conducted in 2007, ATA could not identify Red-tailed Black Cockatoos as a species of conservation concern during the Survey. Red-tailed Black Cockatoos have come out of the Jarrah Forest onto the Swan Coastal Plain after drought affected the forest in 2010 and earlier. This species, listed as Endangered, is now seeking food on the Plain and has been recorded breeding on the Plain.

WEPL notes that sheoak (*A. fraseriana*) ...is a high value foraging species for Forest red-tailed black cockatoo on the Site. (4.4.3 WEPL Report- no page numbers)

Foraging Quality Scoring tool for Carnaby's Cockatoo is 10 and for Forest Red-tailed Black Cockatoos is 8 (Table 12 WEPL). Any score above 6 is considered significant, (Tony Kirkby pers comm)

Other 'Key Findings' of ATA (2007) recorded Peregrine Falcon and four '*other species of conservation concern – western brush wallaby, southern brush-tailed phascogale, black -striped snake and southern brown bandicoot*'. (p20 WEPL).

5.) Cumulative impact

The WA EPA expects proponents to acknowledge and have regard for cumulative impacts. (EPA '*Guidelines for Cumulative Impact Assessment*': January 2026).

6.) Hydrogeology

Lot 600 is situated within the Gngara Groundwater system... (Talis). The UBC is concerned about the Gngara Water Mound being directly under the site and close to significant wetlands. The potential for contamination from stormwater runoff and other events as well as air pollution is possible.

Conclusion

Thankyou for the opportunity to comment.

The Quinns Rocks Environmental Group is a member group of the UBC and is one of the groups meeting the Appeals Convenor. The UBC supports the expertise of the Quinns Rocks Environmental Group representatives.

Should this proposal be approved, the UBC urges that the whole site is not clear-felled.

There is space within roads and buildings to retain trees and understory.