



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

15th June 2023

Chair,

Environmental Protection Authority

Locked Bag 10

Joondalup DC, WA 6919

Smiths Beach Project, Yallingup – Coastal Tourism Village on Lot 4131
Smiths Beach Road, Yallingup, by the proponent Smiths 2014 Pty Ltd.
Assessment number: 2340.

The Wildflower Society of Western Australia (the Society) objects to the proposed development on Lot 4131 Smiths Beach Road, Yallingup, in its entirety, due to reasons outlined in previous submissions, which can be accessed below:

- [Submission on Smiths Beach development project](#)
- [Review recommendation to the EPA on Smiths Beach project](#)

The Society proposes several more key factors that must be considered and addressed in the Environmental Review Document (ERD) based on the provided Environmental Scope Document (ESD):

1. The highly unnecessary location of the elected development area
 - There is disused farmland to the east of Lot 4131 with degraded to completely degraded vegetation which would have the most minimal impact to environmental factors with the development proceeding. This land is closer to the main road (Caves Rd), and would therefore provide easier access as well reducing travel emissions



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2. There is already current and existing hotel and resort style accommodation developments in the surrounding area
3. The increased visitation of the area indirect results in a higher rate of fauna deaths due to increased road and motor traffic
4. The vegetation in the development envelope is of predominately 'Excellent' to 'Very Good' condition, containing vegetation communities, soil associations, fauna, flora, and heritage listed landforms, listed as Matters of National Environmental Significance (MNES)
5. Development in this area will invite future development proposals to capitalise on the increased traffic, resulting in further urbanisation and destruction and degradation of vegetation and flora
6. Waste produced from this resort such as water waste will require the need for further industrialisation of this area
7. An ESD is required to reflect a holistic and cumulative assessment of the impact of a proposal. This draft ESD excludes all off-site and directly related impacts including the 50 - 80m hard rock seawall required to be constructed on the active beach zone as a direct consequence of the proposal, the southern access road, road upgrading and required servicing.
8. The developer should not be able to investigate themselves using consultants that prior to undertaking the environmental assessment have already concluded that the 'environmental impact is minimal'. The EPA must require an independent 3rd party review for all aspects of the environmental investigation, analysis, and reporting to eliminate bias.
9. The total impact of the project needs to be assessed including



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- a. The location of the basic raw materials (BRM) to be sourced for completion of the project;
 - b. The access routes to be used for delivery of construction materials and BRM to the site and the impact of this increased heavy haulage on the local road network and tourist traffic.
10. The draft ESD reflects an inadequate approach to Visual Impact Assessment (VIA) and must include the Visual Management Objectives (WAPC 2007) and reference the Combined methodologies for the site. The ESD should provide for a peer review of the completed VIA.
11. Basic assessment against the identified environmental factors, including the completion of an adequate VIA, will require the prior completion of a comprehensive and building specific Bushfire Management plan, a completed on-site sewage disposal suitability assessment and a consequent waste-water management plan. The draft ESD does not clearly set out that the environmental impact assessment will be based on the prior completion of either of these studies and documents.

Section 1.5 Commonwealth Government approvals (pg. 12);

- The genus of Baudin's Black Cockatoo and Carnaby's Black Cockatoo has been incorrectly referred to as, *Calyptorhynchus*. The correct scientific genus is *Zanda*.
- 11 flora species recognised as possibly present, as per the Emerge Flora Report Table 1, and Leeuwin Naturaliste Ridge have been omitted from an MNES listing.
- The previous fauna assessments have not included a survey of migratory fauna species which will be directly and indirectly impacted as a result of



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this development. Further surveys and assessments must be carried out at the appropriate timing.

Table 5 Preliminary key environmental factors and required work, section heading ‘Coastal Processes’, subheading ‘Relevant Activities’ (pg. 18);

- The development of the sea wall access ramp to the beach as well as the location of the sewer drainage site has been omitted in.

Table 5 Preliminary key environmental factors and required work, section heading ‘Landforms’;

Subheading ‘Relevant Activities’ (pg. 19);

- The sea wall access ramp to the beach must also be included and addressed.

Subheading ‘Potential impacts and risks’ (pg. 19);

- As well as addressing the granite headland under subheading
- Does not address the impact of reflected energy from the seawall on the marine environment in the area.

Table 5 Preliminary key environmental factors and required work, section heading ‘Subterranean Fauna’, subheading ‘Potential impacts and risks’ (pg. 21);

- The effects on subterranean fauna of sewerage disposal must be addressed in Table 5.

Table 5 Preliminary key environmental factors and required work, section heading ‘Flora and Vegetation’ (pg. 22);

Subheading ‘Relevant Activities’ (pg. 22):



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- Must address the direct and indirect implications to the total area as per the EP Act.

Subheading 'Potential impacts and risks' (pg. 22):

- The indirect loss of regional and locally specific vegetation and threatened species, the increased foot traffic, direct impact from reticulated treated sewerage water, decreased pollination of flora due to direct and indirect loss of fauna, must be addressed under.

Subheading 'Required work'(pg. 22/23):

- It is not specified if new flora surveys will be undertaken with the inclusion of the additional surveys, as the previous timing was incorrect.

Table 5: Preliminary key environmental factors and required work, section heading 'Terrestrial Fauna' (pg. 25):

Subheading 'Relevant activities' (pg. 25):

- '... potential native fauna habitat...' must be removed as there is fauna recorded in the area, and therefore is not 'potential' fauna habitat.

Subheading 'Potential impacts and risks' (pg. 25):

- impacts from the removal and disruption of the habitat corridor and likely ecological linkage on fauna species migrating from surrounding vegetation areas must be addressed.
- Impacts from Phytophthora dieback and invasive flora species on fauna habitat, and resource limitations must be addressed.
- Impacts from indirect loss of fauna species due to the removal and alterations of this vegetation corridor to escape predation and fire,



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particularly with inappropriate fire regimes and altered wildfire intensities and time periods resulting from climate change.

Subheading 'Required work (MNES)' (*pg. 26*):

- An assessment survey for foraging habitat for the three Black Cockatoo species in accordance with 'Referral guideline for 3 WA threatened black cockatoo species (2022)' must be conducted.

ESD Figure 2 (*pg. 16*)

There are three areas designed for public open space, this must be included in the total area of disturbance, as the foot traffic will cause further degradation and loss of flora, vegetation and habitat. Have conservation species been taken into account in the retained vegetation for public open space? What measures will be in place to protect such species?

This is an area of great diversity and importance, any development to this land will be an environmental and ethical crime. The only alteration to this land should be the change in land use to an extension of the national park of its entire area; to preserve, conserve, and secure the futures of our biodiverse, and unique ecosystems.

Summary

The ESD prepared for Smiths Beach Project, Yallingup – Coastal Tourism Village on Lot 4131 Smiths Beach Road, Yallingup, by the proponent Smiths 2014 Pty Ltd. Assessment number: 2340 is totally inadequate as the area of study of the proposal is not broad enough to address all the environmental and



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social impacts of the project. The project should include a cumulative impact assessment which reflects the impact of this project with other planned or potential impacts in the area.



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