

From: Brendan Kelly
To: [Anthony Rowe](#)
Cc: [Paul Needham](#)
Subject: Revised information - Lots 3 and 27 Ludlow Park Road, Ludlow
Date: Monday, 29 January 2018 12:44:21 PM

Date: 29th January 2018

Our Reference: RF14817

To: Anthony Rowe, Manager Development Services and Policy, City of Busselton

From: Department of Water and Environmental Regulation, South West Region

cc: Paul Needham, City of Busselton

Re: Revised information - Lots 3 and 27 Ludlow Park Road, Ludlow

Thank you for your email inquiry of 25th January 2018 with regards to the above matter, including the attachments:

- Drawing: 2332-L3&237 Rev 7, BSO Development Consultants, 19th August 2016 - 'EXTRACTIVE INDUSTRIES PLAN LOTS 3 & 237 LUDLOW PARK ROAD, LUDLOW' (Drawing 1)
- Drawing: 2332XSect Rev 2, BSO Development Consultants, 12th September 2017 - 'EXTRACTIVE INDUSTRIES PLAN "PIT CROSS SECTION" LOTS 3 & 237 LUDLOW PARK ROAD, LUDLOW' (Drawing 2)
- Letter ALTUS PLANNING to City of Busselton, 22nd January 2018: 'SUBMISSION TO SUPPORT RECONSIDERATION OF DEVELOPMENT APPLICATION AT LOTS 3 & 237 LUDLOW PARK ROAD, WONNERUP, DR 337/2017 (ALTUS Submission)

In context of this extractive industry (EI) proposal, the City of Busselton (CoB) has asked the Department of Water and Environmental Regulation (DWER) for advice:

- On whether the margins for ground water and excavation depths is now satisfactory.
- Any protections that you may recommend that the City could apply as conditions.

With respect to ground water and excavation depths, based upon the water table across the site being uniform, DWER previously determined that the maximum pit floor depth for any extraction across the site should be 1.2 metres AHD and as such no excavation can occur below 1.2 metres AHD.

It is however noteworthy that the ALTUS Submission has stated that following a meeting in late October 2017, (between the proponents, the City and DWER) *"it was agreed that the maximum allowable depth of limestone extraction shall not go*

below 1.25 metres (AHD)”.

Given that DWER’s determination is based on risk mitigation, there is no objection to the more conservative maximum pit floor depth of 1.25 metres AHD being applied.

It should be noted that the figure of 1.25 metres AHD is based upon any EI maintaining a minimum separation distance of 0.3 metres from the maximum seasonal groundwater level (MSGSL) across the site (as extrapolated), which has been determined at 0.95 metres AHD.

Based upon the principal that a 1 metre separation from MSGSL is desirable for the final landuse of irrigation, it follows that the rehabilitated surface must maintain a minimum 1 metre separation from the MSGSL of 0.95 metres AHD and thus the final rehabilitated surface across the site should be 1.95 metres AHD.

Overall, DWER is concerned that the extractive industry shall at no point intercept the groundwater table and that the final rehabilitated landscape for the purpose of irrigation is such that groundwater resources are protected from the impacts of the end land use.

As safeguards against interfering with the groundwater – either during EI operations or in a post EI landscape - DWER strongly recommends that the following conditions be applied to any license for the site.

RECOMMENDATIONS

DWER recommends that:

- At no time shall the EI be permitted to intercept the water table.
- The maximum allowable depth of limestone extraction shall not be permitted below 1.25 metres (AHD).
- The final rehabilitated surface across the site shall be no less than 1.95 metres AHD.
- If interception of groundwater occurs at any time during EI operations, work shall cease immediately and an advice notice provided to the City of Busselton within 48 hours, followed by agreed remedial action and a review of operational integrity.

Finally, it is recommended that if the EI is approved, regulation should be applied to ensure that the proponent and/or his contractors are quarrying in a controlled fashion.

This should involve a GPS system that works to the level set in the CoB EI license conditions.

Please contact this office for inquiries.

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