

Summary of Submissions

(as identified by Shire of Serpentine Jarrahdale)

No.	Sub No.	Issue Raised	Applicant Response
1.0		Dust Generation	
	1.1	Local wind conditions and fragile soils already generate dust, and the proposed scale and stage size of application would hinder the success of proposed control measures.	<p>The Minister for Environment issued an approval under the Environmental Protection Act 1986 (EPA 1986), Statement No. 810 on the 19 October 2009, (Ministerial Approval) for a mineral sands mine. Part of that approval was the requirement for a number of management plans.</p> <p>The management plans will ensure the concerns raised relating to dust are appropriately dealt with as outlined below.</p> <p>Dust Management Plan</p> <p>The objectives of the Dust Management Plan are detailed within the Ministerial Approval:</p> <ul style="list-style-type: none"> • Ensure that dust emission from activities undertaken in implementing the proposal do not cause ambient dust concentration levels outside the boundary of the proposal area that are: <ul style="list-style-type: none"> ○ i) higher than 1ug/m3 of Total Suspended Particulates as a 15 minute average; or ○ li) higher than 50 ug/m3 of Particulate Matter smaller than 10 microns as a 24 hour average, in excess of five times per year. <p>As stated in the Ministerial Approval the Dust Management Plan will ensure that ‘dust emissions do not harm or adversely affect environmental values or the health, welfare and amenity of people and land uses.’</p> <p>The requirements of the Dust Management Plan are comprehensive, the Proponent is required to:</p> <ul style="list-style-type: none"> • Outline the results of on-site baseline dust monitoring and modelling; • Identify ways to predict weather forecasts; including avoiding, ameliorating and protecting from dust impacts; • Take measurements from off site to determine actual winds conditions; • Establish a complaint management procedure; and • Detail the outcomes of the landowner agreements when mining in close proximity to occupied residences. <p>The requirements are such that a plan for each pit is to be prepared that indicates where and when the mining is to occur within the pit. While the total mined area at any one time is restricted to 30 ha there may be a number of pits across the</p>

			<p>site. The various pits will allow mining to occur in areas when other areas are unable or not suitable to be mined due to prevailing winds or noise restrictions.</p> <p>A monitoring program is required to be prepared that identifies the trigger values for the implementation of a management measure. There are a number of proposed dust management actions some of which are:</p> <ul style="list-style-type: none"> • Clearing of site <ul style="list-style-type: none"> • No clearing of vegetation and stripping top soil until necessary; • Top soil stripping will be conducted in calm wind conditions; and • A dedicated water truck in operation during stripping. • Loading of processed ore; <ul style="list-style-type: none"> • Spillages of processed ore in the stockpile area will be collected at the end of each shift and returned to the main stockpile; • Water carts or fixed sprinklers will be used to keep the work area damp; and • All loads of processed ore are covered prior to leaving the stockpile area. • General operations <ul style="list-style-type: none"> • Water trucks available for dust suppression; • Internal roads watered to minimise dust from vehicle movements; • Clay spread on open areas to create an erosion resistance crust; • Mulch and stubble will be used on open areas as temporary stabilisation; • Topsoil stockpiles will be sown with appropriate cover crop (e.g. cereal rye or oats) or hydromulched to form an erosion resistant surface; and • Temporary 'stubble' crops will be established on refilled mine pits. Pasture will be re-established as soon as practicable after mining. <p>The Proposal to mine only 30ha at a time and in a staged approach enables the area that is disrupted at anyone time to be reduced. This is expected to make the management of the dust matters more effective.</p> <p>In addition to the Dust Management Plan there are rehabilitation requirements that will increase the success of dust management.</p>
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			<p>Rehabilitation Management Plan</p> <p>The Ministerial Approval requires the Rehabilitation Management Plan to 're-establish self-sustaining local provenance native vegetation cleared in the implementation of the proposal, at a ratio of not less than 1.4:1 (1.4 hectares of revegetation per 1 hectare of vegetation cleared) and the re-establishment of functioning pasture which arguably provides for an increased level of amenity and quality of environment which would not have been provided for by the existing 'rural' pursuits.</p> <p>The plan is required to:</p> <ul style="list-style-type: none"> • Protect areas to be re-vegetated from access by grazing stock to enable the vegetation to mature; • Translocate native plant species to re-vegetation areas; • Identify and eradicate weeds in the re-vegetation areas; • Utilise dieback resistant species; and • Identify the use of local species of the local area. <p>It is currently proposed that the rehabilitation will be achieved through the establishment of environmental corridor linkages running north south connecting to the creek lines that will run east west. The local flora species selected will have the ability to enhance the biodiversity within the subject site. The majority of riparian vegetation has been cleared through the subject site due to previous grazing practices. By implementing corridor linkage planting, both upland and lowland species will be replanted, rather than the current dominance of the existing upland community remnants.' The areas of native vegetation (totalling minimum of 75 hectares) will be fenced off to ensure that stock do not degrade the existing vegetation. Note the 75 hectares is located within the Shire of Murray.</p> <p>In addition the following management practices will ensure that the rehabilitation of the site will occur:</p> <ul style="list-style-type: none"> • Top soil will be stripped and stockpiled only when necessary in preparation for the extraction process; • Extraction of the minerals sands will occur over a limited area of the subject site at any one time; • Rehabilitation will occur in the 'shadow' of the excavation site; and • Implementation and regular review of the management plans will occur. <p>It is expected that these rehabilitation activities will positively contribute to dust management measures implemented via</p>
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			<p>the Dust Management Plan.</p> <p>There is additional security that the above measures will be undertaken in accordance with the Ministerial Approval through the compliance requirements.</p> <p>Compliance</p> <p>The Ministerial Approval requires a range of rehabilitation measures and management plans to be implemented as part of the Approval. The management plans relate to protection of native vegetation, water courses and wetlands, rehabilitation, weed and dieback reduction, nutrient control, water quantity and quality, acid sulphate and air quality and dust. The implementation and compliance reporting required as part of the Ministerial Approval will ensure that there are no concerns relating to rehabilitation at completion of the operations. The Ministerial Approval requires a compliance assessment plan is prepared. The compliance assessment plan deals with the:</p> <ul style="list-style-type: none"> • Frequency of reporting, • Approach and timing of compliance assessments; • Retention of compliance assessments; • Reporting of potential non-compliance and corrective actions taken; and • Public availability of compliance reports. <p>In addition there are significant performance bonds associated with the management plans. The Ministerial Approval requires a bond each year of operation. The bonds are significant in nature (approximately \$43.9 million indexed to inflation) and the Minister has the ability to have the financial assurances called on in accordance with section 86A of the Environmental Protection Act.</p> <p>Where there is non-compliance there are corrective and preventative actions that are to be undertaken in accordance with a directive of the CEO of the EPA</p>
	1.2	There was concern that the proposal doesn't sufficiently consider the health implications, including rainwater contamination and respiratory issues.	The Department of Health's (DoH) concerns are noted. No substantive health issue is raised, which is not covered by the Ministerial Statement. It is important to remember that the DoH was consulted in the Environmental Protection Act 1986 process as a 'Decision Making Authority' pursuant to section 45(7) of that Act.
	1.3	There was concern dust would impact on livestock, with a resultant loss in income.	Refer to comments provides within submission 1.1 under Dust Management Plan.
2.0		Groundwater Abstraction and	

		Dewatering	
	2.1	There was significant concern that the volume of groundwater to be abstracted, and the scale of dewatering required, would threaten the availability of groundwater for domestic and rural uses, particularly in the context of a drying climate.	<p>The Department of Water will assess the groundwater licence for abstraction through the appropriate approval process. The following comments have been provided by the Department of Water during the advertising period.</p> <p><i>The proponent is currently undertaking an application process for a groundwater licence for abstraction from the Leederville Aquifer for operational purposes. An Operating Strategy is currently required to support this application. The matter will be determined following the receipt and assessment of this information.</i></p> <p>Any concerns relating to the scale of the dewatering will be addressed through this approval process.</p> <p>The concern relating to the loss of domestic ground water uses have been contemplated through the environmental approval process. The Ministerial Approval requires the preparation of a Water Management Plan that monitors ground water, details trigger levels and monitors the quality and quantity of ground water in the area.</p> <p>Section 11-4 (d) of the Ministerial Approval requires the Proponent to:</p> <p><i>identify measures to provide an alternative source of water, particularly to surrounding groundwater users where monitoring in item (a) indicates that mining activities has adversely affected water quality to the point where it cannot be used for its intended purpose or ecosystem maintenance.</i></p> <p>The Ministerial Approval provides the reassurances that land owners are looking for in relation to abstraction of groundwater.</p>
	2.2	There was concern for potential loss of income from poorer quality pasture, and insufficient water availability for agricultural uses.	Refer to comments within submission 2.1 relating to the requirement for the Proponent to find an alternative source of water where domestic supplies are adversely affected.
	2.3	Several submissions were also concerned about the potential environmental impact of proposed abstraction.	<p>The Ministerial Approval requires the abstraction of water 'does not materially effect the quality or quantity of groundwater available to other users in the area, or adversely effect the health and condition of native vegetation and ecosystems in the area'. The preparation and implementation of a 'Water Management Plan' will:</p> <ul style="list-style-type: none"> • Monitor groundwater quality and quantity on surrounding properties and down stream of the subject site; • Monitor the health and condition of native vegetation; • Identify groundwater trigger levels;

			<ul style="list-style-type: none"> • Ensure quality and quantity of groundwater is maintained post-mining; and • Minimises impacts associated with discharge of excess water. <p>The proponent has progressed through a comprehensive assessment process with the EPA to minimise any adverse effects on the subject site or surrounding area. The proponent has refined the management plan to accommodate the desires of the DoW and EPA resulting in a Ministerial Approval. Through that process the proponent is obligated to implement the management plans and will be required to revise the plans at the discretion of the CEO of the EPA.</p>
3.0		Heavy Vehicles	
	3.1	Submissions were concerned with the use of local roads by heavy vehicles, suggesting that the planned haulage route includes unsuitable roads, school bus routes, and would pass through North Dandalup townsite with potential impacts on schools.	<p>The proposed heavy haulage transport route does not utilise roads within the Shire of Serpentine Jarrahdale. It is assumed that the comments relate to transportation route within the Shire of Murray. The Proponent has identified that the preferred route is Atkins Road, Readheads Road, South Western Highway (located in the Shire of Murray) and it indicates that:</p> <ul style="list-style-type: none"> • the necessary transport permits will be obtained from the Shires of Murray for transport on local roads, and Main Roads WA, for transport on the South Western Highway; • consultation with the Shire of Murray on any required signage, upgrading of local intersections or road pavement that is needed for safe movement of all traffic on local roads; • consultation with Main Roads WA on the intersection requirement of Readheads Road with the South Western Highway; and • Any required upgrade works will be undertaken to ensure safe traffic access and egress. <p>These are matters for Shire of Murray to consider when determining the development application.</p>
	3.2	Several submissions were also concerned with dust generation from trucks using unsealed roads, and potential decline in the condition of local roads.	<p>The requirements relating to ambient dust concentrations detailed within the Ministerial Approval and documented in the Dust Management Plan relate to internal truck movements.</p> <p>The truck movements are proposed to be located on Shire of Murray roads reserves and is therefore a matter for their determination.</p>
4.0		Lifestyle	
	4.1	Submissions specifically identified that their choice to live in the local area was for a quiet, rural lifestyle and a mining operation would affect that.	<p>The Proposal is temporary in nature of the operation. The planning approval sought is only for a ten year period. The area that will be disrupted at anyone time is only 30ha. The management plans required as part of the Ministerial Approval will control dust, noise, water, rehabilitation and revegetation of the subject site. The culmination of those factors and the potential for existing vegetation to screen operations will ensure that activities on site will not significantly adversely affect the rural lifestyle.</p>

	<p>4.2</p>	<p>Submissions were also concerned that the character and beauty of the local area would be compromised by a mining operation.</p>	<p>A preliminary Visual Impact Assessment of the proposal has been undertaken in accordance with the Western Australian Planning Commission's 'Visual Landscape Planning in Western Australia – A manual for evaluation, assessment, siting and design' (2007). The manual is an acknowledgement of the community's interest in the preservation of landscapes and the need to integrate the evaluation of the landscape into the planning process.</p> <p>Most critically the manual identifies that over time landscapes change through human and natural intervention; and recognises that individual landscapes differ and that rural landscapes involve a highly modified, although sparsely populated context.</p> <p>It is the management of the change to landscape that is the most critical issue, since the receptiveness of the public to change is based on a range of values.</p> <p>The following are characteristics of the proposal:</p> <ul style="list-style-type: none"> • Temporary in nature; • Is restricted in size with only 30 ha of land being disrupted at any point in time; • Site is relatively difficult to access resulting in a reduced number of potential viewers; and • Significant rehabilitation measures required as part of the Ministerial Approval that will provide increased vegetation on site. <p>The visual landscape within the subject site is predominately rural in nature. There are open expanses of land that have over time been used for grazing purposes and subsequently the native vegetation on site is degraded in nature. There are limited significant stands of vegetation on most properties within the subject site. As with most rural areas large vegetation is predominately located along the road reserves. The open low-lying paddocks are broken with sparsely vegetated drainage channels.</p> <p>The preliminary visual landscape assessment identified key views where a change to landscape may be seen by the public and therefore have the greatest affect on the general public. Views of importance were identified as being:</p> <ol style="list-style-type: none"> 1) To the west from the South Western Highway; 2) To the south from Keysbrook Town Site; 3) To the west from the Escarpment; and 4) From the local roads into the subject site, namely Westcott Road, Atkins Road and Elliot Road.
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While the preliminary assessment cannot be provided in full the following summary of findings were identified upon a site visit:

	View	Findings
1	South Western Highway	Views experienced at high speeds in a motor vehicle
		Views of site broken intermittently by vegetation within the road and railway reserve.
		Difficult to even identify the railway reserve.
2	Keysbrook town site	View of site completely obstructed by vegetation.
3	Escarpment	View of site was intermittent due to heavy vegetation (trees and shrubs) within the road reserve on escarpment.
		No formal point along Boyd Road (to the west of the escarpment) that a motorist could park their vehicle to experience the view
		The 30 ha area (not likely to be in one location) that will be progressively revegetated is some 3.6 kilometres away and would be expected to blend with the existing cleared nature of the paddocks.
4	Local roads	View of excavation area is more clear however it is expected to be viewed by less people.

The view of the site and therefore the perceived character and beauty of the local experienced by the public will depend on a range of matters:

- the climactic circumstances in which the viewer is attempting to view the excavation area;
- the angle the excavation area is viewed at;
- the distance the viewer is from the excavation area;
- the objects that are between the viewer and the excavation area; and
- speed the viewer is travelling at, (i.e. walking, cycling, riding, driving or flying); and
- the area that is currently being mined;
- the maturity of the rehabilitation;
- the location of the clearing of exiting vegetation within the subject site;

			<ul style="list-style-type: none"> • the typography of the land; • the weather on the day of viewing the extractive area; and • the time of year (i.e. green pasture in winter will reduce the visual impact of a rehabilitated extractive area). <p>This demonstrates that there will be limited visual impact on the subject site. There are however a number of measures that will minimise the visual impact of mining activities, such as:</p> <ul style="list-style-type: none"> • sequential rehabilitation of the excavation area; • an extraction area that is only 30 ha, at any one time; • limiting the clearing of vegetation to 6 months prior to when the excavation of the area is planned thus reducing the area that is disrupted; • storing and reusing the top soil to encourage growth of pastures; • Revegetation at a ratio of 1.4:1.0; and • Preservation of vegetation within 20m of the major and medium watercourses.
5.0		Noise	
	5.1	Submissions were concerned that noise would impact on residents and livestock. A number specifically noted that sensitive land uses, which had time restrictions, did not include stables although horses would be affected.	The Ministerial Approval specifically requires the preparation of a Noise Management Plan that takes into consideration the impact of Proposal on a noise sensitive use at any noise sensitive premises in accordance with the Noise Regulations.
	5.2	Submissions noted that noise carries great distances due to local conditions, and were concerned with 24 hour operations.	<p>As provided for within the Ministerial Approval, specifically the requirement for a Noise Management Plan, the Proposal must comply with the Noise Regulations at any building associated with a noise sensitive use at any noise sensitive premises. In addition outside of 7am to 5pm Monday to Friday, or public holidays, no mining activity is to be undertaken within 1,500 m of any building associated with a noise sensitive use at any noise sensitive premises.</p> <p>The Proponent has identified an operations plan for mining activities and the location and duration of mining varies to ensure that the above provisions can be achieved while ensuring continued operations of the facilities.</p> <p>Regular monitoring of noise levels at locations representative of the noise sensitive premises closest to the active mining area are required.</p> <p>The monitoring and compliance measures are detailed within submission 5.3 of this submission table.</p>

	5.3	Several submissions also questioned the efficacy of noise monitoring and the process of responding to complaints.	<p>The Ministerial Approval requires the following reporting mechanisms within the Noise Management Plan:</p> <ul style="list-style-type: none"> • Noise monitoring methodology and results, reported to the CEO of EPA each quarter; • Assessment of results against the Noise Regulations; • Details of management or implementation of measures to abate noise emissions; and • At the end of first 12 months of monitoring an independent acoustic expert to assess the extent to which the noise emissions comply with the Noise Regulations, the effectiveness of management and any required modifications is required. <p>In respect to the compliance assessment plan the Proponent shall advise the CEO of any potential non-compliance within two business days of that non-compliance being known. There are additional annual reporting requirements associated with the compliance assessment plan.</p>
6.0		Property Values	
	6.1	A number of submissions were concerned that proposed mining would result in declining property values, and questioned whether compensation would be provided.	<p>Claims regarding alleged reduction in property value are not a planning consideration and are unsubstantiated.</p> <p>Mining operations are expected to last for a maximum of 10 years and are therefore temporary in nature.</p> <p>The Ministerial Approval requires the preparation of a Rehabilitation Management Plan. This will result in the eradication of weeds, identification and removal of dieback and re-establishing self-sustaining local provenance native vegetation at a ration of 1.4:1 which will result in greater coverage of vegetation on site than would be currently provided for under current agricultural practices. There are likely to be long-term environmental benefits to the proposal that will result in amenity improvements for the area.</p>
	6.2	Some submissions specifically noted that any loss in property value would impact on their imminent retirement.	Refer to comments within submission 6.1 of this submission table.
7.0		Future development	
	7.1	A number of submissions suggested that the proposed mining would inhibit future development or subdivision potential of the area.	<p>There is currently limited ability for landowners to subdivide land with the Shire of Serpentine Jarrahdale only supporting the subdivision of land to a minimum lot size of 40 hectares in areas zoned 'Rural'.</p> <p>The Proposal is temporary in nature. The Proposed land use does not impede the long term strategic planning and development of the area.</p>
8.0		Community benefit	

	8.1	Several submissions suggested that the proposal presented no benefit to the local community, and would only present impacts without sufficient contribution to community infrastructure or programs.	There are a number of social, economic and environmental benefits that have been outlined in support of the proposal, some of which are the increased local employment opportunities and increased level of vegetation across the subject area on completion of works. There is expected to be a boost to the local economy through the discretionary spending patterns of workers. Where possible supplies will be sourced locally providing an boost to the local economy.
9.0		Visual impact	
	9.1	Several submissions were concerned with the visual impact of the proposed mining operations, particularly noting the prominence of the area from vantage points on the scarp, and the impact on local tourism.	Refer to comments within submission 4.2 of this submission table.
10.0		Ability to meet obligations	
	10.1	Several submissions were not confident in the proponent's ability to meet rehabilitation and management obligations. Submitters were concerned that financial or other reasons would result in costs or long term impact to ratepayers and local residents.	Refer to the compliance matters raised within submission 1.1 of this submission table.
11.0		Groundwater contamination	
	11.1	Several submissions were concerned that proposed mining would result in contamination of groundwater resources, which is an important source of domestic and rural water.	<p>The Ministerial Approval requires the preparation of a Nutrient Management Plan. The objective is to 'ensure the proposal assists in meeting the water quality objectives of the Peel-Harvey Water Quality Improvement Plan.' Included in this plan is the need to:</p> <ul style="list-style-type: none"> • Outline a programme to monitor nutrient levels in the proposal area and down stream; • Identify nutrient trigger levels; and • Management actions should a trigger be reached. <p>These requirements will ensure that groundwater resources are not contaminated.</p>
12.0		Rehabilitation	
	12.1	A number of submissions were concerned that successful rehabilitation is due to local conditions, particularly that summer extreme wind and winter high groundwater	The Ministerial Approval requires that the Rehabilitation Management Plan outlines a strategy to revegetate areas. This strategy takes into consideration the local conditions and the size of the area required to be regenerated. The requirement for a regeneration monitoring programme will form part of the compliance reporting that is required.

		levels would limit the time when works could take place. This would be exacerbated by the large areas requiring rehabilitation.	
	12.2	Submissions also suggest that the revegetation proposed cannot be achieved as the project area has decreased since the environmental assessment, therefore land available for revegetation is reduced and the ratios presented cannot be achieved.	The Ministerial Approval requires that the 're-establish self-sustaining local provenance native vegetation cleared in the implementation of the proposal, at a ratio of not less than 1.4:1 (1.4 hectares of revegetation per 1 hectare of vegetation cleared). Note it refers to the vegetation cleared. The provisions relating to the protection of native vegetation, that is the 75 hectares of land located in the Shire of Murray and therefore is not subject to this planning approval.
13.0		Vegetation	
	13.1	Several submissions state that all existing remnant vegetation should be retained, due to potential impacts on salinity, biodiversity, and threatened cockatoos.	The Proposal has been considered under the provisions of the EPA 1986 taking into consideration existing remnant vegetation, impacts on salinity, biodiversity and threatened cockatoos and a Ministerial Approval has been granted.
14.0		Buffer to nearby properties	
	14.1	Several submissions are concerned that the proposal provides insufficient buffer between the proposed excavation area and adjacent property boundaries. Submissions suggest increasing the distance between the proposed excavation area and dwellings and agricultural activities.	The Ministerial Approval has specifically contemplated noise and dust emission as outlined within the responses provided. There is no substantiated reason for increased buffers to the extraction area and adjacent property boundaries or to dwellings and agricultural activities or to the relocation of internal haulage roads.
	14.2	Several submissions are concerned that internal haul roads are placed adjacent to property boundaries.	Refer to comments within submission 14.1 of this submission table.
15.0		Land degradation	
	15.1	Several submissions are concerned with erosion and potential land degradation, as a result of extreme wind conditions and fragile soil.	The Ministerial Approval requires the preparation of the following management plans: <ul style="list-style-type: none"> • Rehabilitation Management Plan; • Weed and Dieback Management Plan; • Nutrient Management Plan; • Water Management Plan; • Acid Sulphate Soils Management Plan;

			<ul style="list-style-type: none"> Noise Management Plan; and Air Quality and Dust Management. <p>In addition to those plans there are requirements to protect areas of native vegetation and watercourses and wetlands. The combinations of the actions undertaken to implement these plans and protect those areas is expected to adequately control any potential erosion or land degradation that would result from any action undertaken in implementing the proposal during any extreme wind conditions. The requirement within the Dust Management Plan to ensure the proposal does not cause ambient dust concentration levels to be higher than stated levels will ensure erosion or land degradation from activities is minimal.</p>
	15.2	Submissions suggest the proposal presents significant risk to important farming land in proximity to Perth.	<p>The Proposal is not located within an Agriculture Priority Management Area or Precinct as defined within the State Planning Policy No. 2.5 – Agriculture and Rural Land Use Planning.</p> <p>Notwithstanding the above the Proposal is temporary in nature of the operation. The planning approval sought is only for a ten year period. The management plans that are required as part of the Ministerial Approval will control dust, noise, water, rehabilitation and revegetation of the subject site. As detailed in submission 1.1 (of this submission table) the Rehabilitation Management Plan requires the ‘re-establishment’ of functioning pasture.</p>
	16.0	Community consultation	
	16.1	Several submissions are concerned that community consultation associated with the proposal has been insufficient.	Advertising and has occurred in accordance with the local town planning scheme provisions.
	17.0	Other issues	
		Other concerns raised in submissions include:	
	17.1	<ul style="list-style-type: none"> Hydrological impacts 	Refer to comments within submission 2.0 of this submission table.
	17.2	<ul style="list-style-type: none"> The low grade of the ore and limited financial viability of the project 	The viability of the project is not a planning consideration.
	17.3	<ul style="list-style-type: none"> Acid sulphate soils 	The Ministerial Approval requires the preparation of an Acid Sulphate Soils Management Plan which does not allow the Proponent to ‘cause acid sulphate soil contamination either within the proposal area or elsewhere’. In addition there are a range of monitoring and reporting requirements that are to be made publicly available in a manner approved by the CEO of the EPA.
	17.4	<ul style="list-style-type: none"> Setting a precedent and encouraging further mining in the area 	Precedent is not a planning consideration each application for development must be assessed on its merits in accordance with current planning legislation. The policies of the local, State and federal government are taken into consideration when assessing a development application.
	17.5	<ul style="list-style-type: none"> The presence of alternative sources of mineral sands, 	Department of Mines and Petroleum’s letter to the Shire of Serpentine Jarrahdale states that ‘Titanium-zircon mineralization has strategic economic importance in the Swan Coastal plain, which includes the Keysbrook area, and

		therefore no need to mine the subject land	makes a significant economic contribution to the local community and the State.' The letter goes on to state that 'The proposal for titanium-zircon mining lies within a Strategic Mineral Resource Protection Area for that purpose.' This correspondence indicates the importance of the mineral sands deposit within the subject site.
	17.6	<ul style="list-style-type: none"> Potential that the proposed 10 year timeframe could be extended 	The Proposal identifies a 10 year time frame, if planning approval was granted and operations were required to extend beyond that time frame then a new application would be considered by Council on its merits and in accordance with the planning legislation at that time.
	17.7	<ul style="list-style-type: none"> Potential that operations could be interrupted and the land left in a disturbed state 	The Ministerial Approval provides a series of reassurances in relation to rehabilitation. Refer to comments provided in submission 1.1 of this submission table.
	17.8	<ul style="list-style-type: none"> Compliance with staging and conditions may not be monitored 	The Ministerial Approval requires compliance reporting as outlined within submission 1.1 of this submission table.
	17.9	<ul style="list-style-type: none"> Mosquitoes 	The preparation of a Mosquito Management Plan in association with the Water Management Plan would address the mosquito issues raised by the Department of Health where and if required.
	17.10	<ul style="list-style-type: none"> Lacking provision of management plans to enable full consideration 	The Proponent has been provided legal advice in relation the provision of the management plans which has been provided to the local authority for consideration.