



Environmental Protection Authority

Environmental Protection Act 1986

Section 43A

STATEMENT OF REASONS

CONSENT TO CHANGE THE PROPOSAL DURING ASSESSMENT

Proposal Perth Groundwater Replenishment Scheme Stage 2

Proponent Water Corporation

Decision

For the reasons outlined below, I, on behalf of the Environmental Protection Authority (EPA), have determined to consent to the proponent changing the proposal outlined in Schedule 1 attached to this Statement of Reasons.

I have also determined that no consultation or public review is necessary in regard to considering the request to consent to the change. This is due to the nature of the changes which would result in a very small increase in the extent of the proposal from that as described in the proponent's Referral documentation. In addition the changes to the proposal will be fully assessed in the EPA's report and recommendations to the Minister for Environment which will be subject to a 2 week appeal period.

Background

On 3 November 2016, the Water Corporation referred the Perth Groundwater Replenishment Scheme Stage 2 to the EPA under section 38 of the *Environmental Protection Act 1986* (EP Act). The proposal includes the construction of an advanced water recycling plant (AWRP) at the Beenyup Wastewater Treatment Plant site and the construction of two water recharge sites and pipeline infrastructure along a 12.8 kilometre (km) route through the suburbs of Craigie, Woodvale, Wanneroo, and Neerabup within a 29.42 hectare (ha) development envelope. The proposal would result in the clearing of approximately 2.15 ha of native vegetation. The proposal seeks to recharge up to 14 gigalitres of recycled wastewater to the Leederville and Yarragadee aquifers.

The EPA determined to assess the Proposal at the level of Referral Information on 25 January 2017 and is yet to publish its assessment report.

In advance of a decision or agreement in relation to whether or not the proposal may be implemented under section 45 of the EP Act, the proponent has sought the EPA's consent to change the proposal. The s43A change would result in an increase in the development envelope to 32.12 ha, with the requirement to clear an additional 0.04 ha of native vegetation. An additional 0.17 ha of black cockatoo foraging habitat is also proposed to be cleared, being two pine trees from the pine seed orchard within

Yellagonga Regional Park. The proposal will now result in a total loss of 2.36 ha of black cockatoo foraging habitat.

The changes relate to amending the size and location of temporary construction areas and a minor change to the alignment of the recharge pipeline. The primary reason for the changes are related to the provision of additional areas to ensure the adequate treatment of acid sulfate soils and dewatering water, constraints related to the use of trenchless technology and constraints related to the access and construction of the southern recharge site.

Relevant Statutory and Administrative Provisions

Section 3.8 of the *Environmental Impact Assessment (Part IV Divisions 1 and 2) Procedures Manual 2016* guides what information the EPA requires from a person wanting to change its proposal during assessment.

In considering the request for consent, I considered the:

- details of the proposed change;
- statement of the significance of the change; and
- rationale for the change.

Materials considered in making this decision

In determining whether to consent to the proponent changing the proposal I have considered the following:

1. the document *Perth Groundwater Replenishment Scheme Stage 2 Assessment No: 2111 – Application to change proposal under S43A*, April 2017, Water Corporation (Rev 1, PM #16761844) (hereafter called the supporting documentation);
2. spatial data provided by Water Corporation showing the location and area of the change; and
3. supporting documentation for the proposal supplied by Water Corporation at the time of Referral: *Perth Groundwater Replenishment Scheme – Stage 2 Referral – Supporting Document*, October 2016, Water Corporation (Version 3).

Consideration

1. Nature of the proposed change

The change requires an increase in the development envelope of 2.70 ha from 29.42 ha to 32.12 ha. This requires an increase in the extent of native vegetation required to be cleared from 2.15 ha to 2.19 ha. The proposed change also requires an additional clearing of 0.17 ha of black cockatoo foraging habitat within a pine seed orchard (removal of two pine trees). The change in the alignment of the recharge pipeline is related to the requirement to lay out the section of pipe to be tunnelled under the area of intact Banksia woodland. The previous alignment would have impacted on a residential building.

2. Stage of the assessment process

On 25 January 2017 the EPA set the level of assessment for the proposal as Referral Information. The EPA was undertaking its assessment when the request was made to change the proposal.

3. Currency, relevance and reliability of the information, including submissions

The proposal was referred to the EPA in November 2016 and all information submitted in support of the referral remains current. In addition the proponent submitted a Construction Environment Management Framework and an update on stakeholder consultation with the request to change.

4. Community engagement

The community was engaged in regard to the original proposal but was not engaged in regard to the proposed change. The EPA intends to publish information on the proposed change for public information. The proponent has continued to consult with stakeholders since referral of the proposal and provided an update on consultation with the request to change.

5. Level of public concern

The EPA advertised the referral information for public comment in November 2016 and received four comments. The EPA does not consider that the proposed changes would result in an increased level of interest in the proposal.

Consideration of Whether the Change is Unlikely to Significantly Increase Any Impact that the Proposal May Have on the Environment.

a) Values, sensitivity and quality of the environment which is likely to be impacted.

Hydrological Processes, Inland Waters Environmental Quality, Flora and Vegetation and Terrestrial Fauna were considered to be preliminary key environmental factors at the time the Level of Assessment was set. The proposed change gives no cause for additional environmental factors to be considered given the small increase in the extent of native vegetation clearing required.

The proposal alignment traverses four Bush Forever Sites that contain black cockatoo foraging habitat and potential breeding habitat. However, the changed proposal is unlikely to have a significant environmental impact that is additional to, or different from the original proposal.

b) Extent (intensity, duration, magnitude and geographic footprint) of the likely impacts

The proposed increase in the development envelope is in part to allow for the appropriate management and treatment of acid sulfate soils and dewatering. Additional areas of temporary clearing required for the use of trenchless technologies have been selected primarily in already cleared areas, areas of parkland or areas considered to be completely degraded.

However, the small increase in the extent of native vegetation required to be cleared (0.04 ha) will occur in an area considered to be Banksia woodland ecological community and black cockatoo foraging habitat. The clearing will allow

for the use of trenchless technologies in order to avoid constructing the recharge pipeline using conventional trenching methods through a consolidated area of native vegetation.

With regard to the change being an additional area of disturbance, the EPA is of the opinion that the change will not result in an increased area of impact in the context of the entire proposal.

c) Consequence of the likely impacts (or change)

The consequences of the likely impacts of the changes are broadly consistent with that of the original proposal.

d) Resilience of the environment to cope with the impacts or change

The majority of the development envelope at the time of referral and with the proposed change is located within Yellagonga Regional Park (Bush Forever Site 299). Yellagonga Regional Park, while containing areas of native vegetation, is a recreational parkland containing areas of trees over grass. The proposed alignment of the pipeline following the requested change will be situated in areas of parkland and is not expected to significantly increase the impacts to the environment compared to the impacts expected if the original proposal were implemented.

The OEPA considers the resilience of the environment to cope with the changed proposal remains unchanged from that of the original proposal, should it be implemented.

e) Cumulative impact with other projects

Cumulative impacts will be considered in the assessment of the changed proposal as it were to be considered in assessment of the original proposal. The 0.04 ha increase in the extent native vegetation to be cleared and the loss of two pine trees considered black cockatoo foraging habitat is unlikely to significantly increase the cumulative impact at a local or regional scale.

f) Connections and interactions between parts of the environment to inform a holistic view of impacts to the whole environment

A significant increase in the impact to the environmental function and values of the area is not expected by the changed proposal above what it would be if the original proposal were to be implemented. A holistic assessment of the changed proposal will be undertaken during the assessment stage of the proposal.

g) Level of confidence in the prediction of impacts and the success of proposed mitigation

There is no change in the level of confidence in the predicted impacts and the success of the proposed mitigation.

h) Public interest about the likely effect of the proposal, if implemented, on the environment, and public information that informs the EPA's assessment

The EPA is of the opinion that public interest in the proposal will likely remain the same; that is, minimal local interest.

Schedule 1

Changes to Proposal

Element	Current Proposal	Changed Proposal (s43A)
Advanced water recycling plant	Development envelope of 2.83 hectares (ha) Clearing of up to 0.10 ha of native vegetation	Development envelope of 2.83 ha Clearing of up to 0.13 ha of native vegetation
Recharge pipeline	Development envelope of 25.26 ha Clearing of up to 2.05 ha of native vegetation	Development envelope of 27.58 ha Clearing of up to 2.05 ha of native vegetation
Southern recharge site	Development envelope of 0.83 ha No clearing of native vegetation	Development envelope of 1.21 ha No clearing of native vegetation required
Northern recharge site	Development envelope of 0.50 ha No clearing of native vegetation required	Development envelope of 0.50 ha No clearing of native vegetation required