



Application for Works Approval

Part V Division 3 of the *Environmental Protection Act 1986*

Works Approval Number W3018/2025/1

Applicant Westdeen Holdings Pty Ltd

ACN 009 430 433

File number APP-0028968

Premises Aglime Lancelin Minesite
Walker Ave, Lancelin
GINGIN, 6503

Legal description
Part of mining tenements
M70/250 and M70/692
As defined by the coordinates in Schedule 2 of the works approval and by the premises maps attached to the issued works approval.

Date of report 21/11/2025

Decision Works approval granted

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1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction / installation and operation of the premises. As a result of this assessment, works approval W3018/2025/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) has considered and given due regard to its regulatory framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary and overview of premises

On 2 May 2025, the applicant submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application is to undertake construction works relating to screening of sand and vegetation at the premises. The premises is approximately 1 km east of Lancelin.

The proposed maximum throughput capacity is 200,000 tonnes per annum with hours of operation from 7:00am to 6:00pm Monday to Friday, and 7:00am to 12:00pm on Saturdays. No activities to occur on Sundays or Public Holidays.

The applicant has been mining limesand on the premises since early 1988 and owns mining tenements / leases M70/250, M70/692 and L70/107. The tenements contain deposits of high-grade limesand that is ideally suited both physically and chemically as an agricultural lime. Mining operations involve loading limesand by front-end loader direct from a mobile dune into trucks for immediate delivery to farms in the central and eastern wheatbelt and the great southern where it is used to neutralise acid soils. Mining operations are regulated by the Department of Mines, Petroleum and Exploration (DMPE) and are therefore not assessed in this report.

No dangerous goods or hazardous chemicals are to be used in these operations. Refuelling of mobile equipment occurs by a mobile service vehicle and trained personnel in the laydown area as no fuel is stored onsite.

The premises relates to the category and assessed production capacity under Schedule 1 of the Environmental Protection Regulations 1987 (EP Regulations) which are defined in works approval W3018/2025/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in works approval W3018/2025/1.

2.3 Public Drinking Water Source Area (PDWSA)

The prescribed premises is situated within the mid-west coastal plain and is characterised by a relatively shallow (2 to 5 m) water table below the interdunal valley floors. The groundwater in the area flows towards the coast to the west as the soils are free draining. The mining tenements cover an area where underground water is being used for consumption by the residents of Lancelin (Public Drinking Water Source Area (PDWSA)).

There are four Wellheads located to the west of mining tenements M70/250 and M70/692 with the P1 Wellhead Protection Zone extending into the tenement boundaries by approximately 150 to 160 metres (Figure 1). A Water Management Plan (WMP) was developed by the

applicant to establish and maintain an effective Water Management System and assist in meeting obligations in accordance with relevant legislation and mining conditions.

Tenement M70/250 and M70/692 are vested within the Water Supply Reserve (36740), where routine inspections (typically quarterly each year) of the mine site operations are carried out by the applicant in conjunction with the Water Corporation rangers for the district.

During the installation of groundwater bore (180427) in 2015, the static groundwater level (before any pumping) was recorded by the licensed installer (Straight Line Drilling) to be 2.5m below ground level (mbgl).

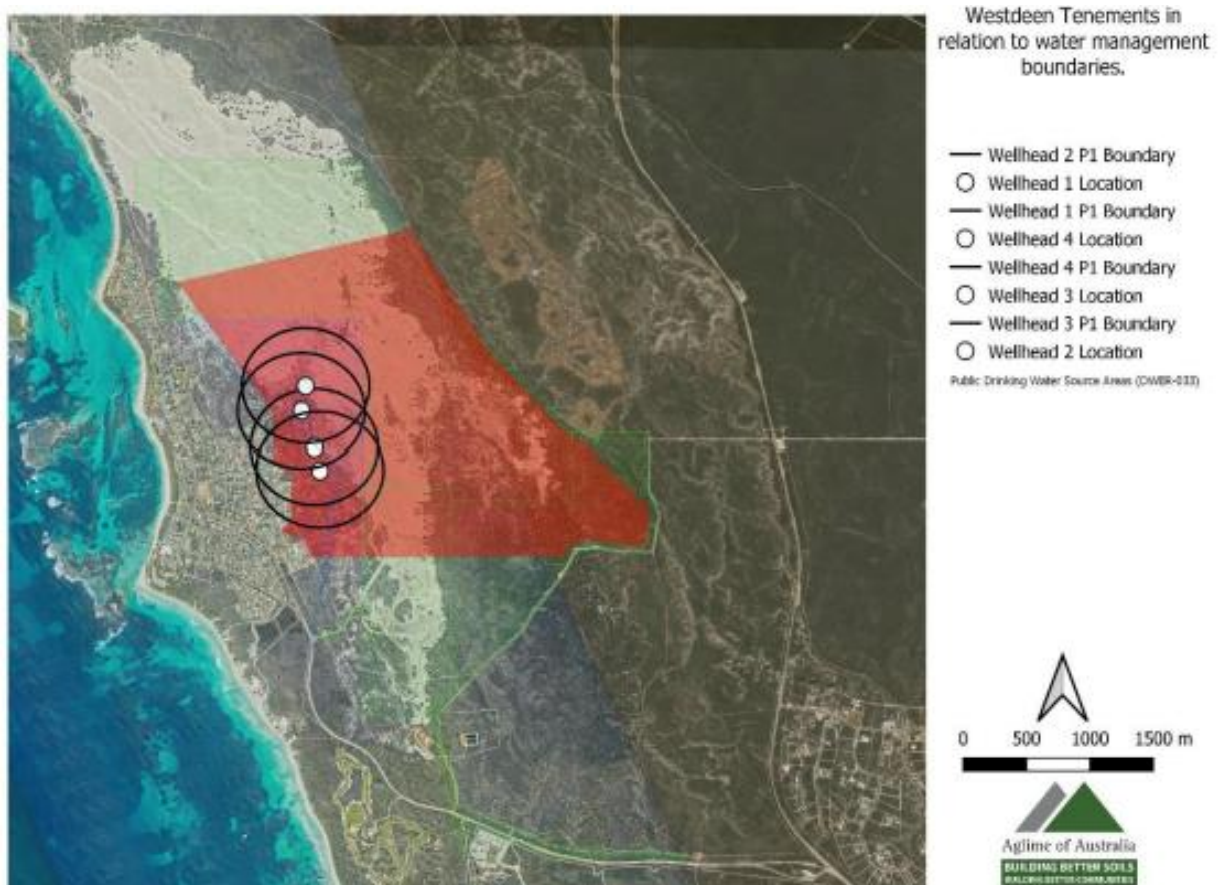


Figure 1: Location of mining tenements in relation to relevant water management boundaries

2.4 Other Approvals

The Tenement Endorsement and Conditions Extract issued by Department of Mines, Industry Regulation and Safety (DMIRS), now Department of Mines, Petroleum and Exploration (DMPE), outlines the specific conditions and endorsements attached to mining tenements M70/250 and M70/692 under the *Mining Act 1978*. Some of the key conditions/endorsements include prohibiting vehicle servicing or refuelling within the Lancelin Water Reserve and complying with *Water Quality Protection Note 25 Land Use Compatibility in Public Drinking Water Source Areas* and *Water Quality Protection Guidelines: Mining and Mineral Processing*.

Key items that need to be considered within the Water Quality Protection Note and Guidelines include:

- All mining/activity in respect to mining operations involving the handling, storage, transport and use of toxic and hazardous substances within public drinking water source areas is prohibited unless approved in writing by the Department (DWER); and

- Above ground petroleum hydrocarbon and other chemical storage tanks are incompatible with P1 areas.

A groundwater licence (GWL180427) has been obtained with an abstraction limit of 6000 kilolitres per annum. The main use of this water is for onsite dust suppression and hygiene facilities.

A clearing permit (CPS 10976) has also been applied for and is under assessment by the Department of Mines, Petroleum and Exploration for the clearing of 16 ha on the premises. The Delegated Officer notes that the onus rests with the applicant to ensure compliance with all relevant regulatory bodies.

3. Noise modelling and monitoring

3.1 Acoustic modelling and assessment

3.1.1 Acoustic assessment summary

The applicant submitted an *Hering Storer Acoustic Noise Assessment* (HSANA) (HSA 2025). This report documents noise modelling at the premises with key activities being sand screening operations.

The most noise-sensitive receivers within the Lancelin townsite were identified and labelled (R1, R2, R3, R4, R5 and R6) and are located approximately 750 m – 800 m west of the screening operation areas.

As the applicant has proposed to only operate during the day, the applicable acoustic criterion for the neighbouring residences is the assigned L_{A10} day period noise level of 45 dB(A) for receivers R1, R2, R5, and R6. R3 was assigned L_{A10} day period noise level of 46 dB(A) and R4 was assigned 47dB(A).

Sound power levels, used in the assessment calculations, are based on measured sound pressure levels of similar equipment proposed for use on the premises (Table 1).

Table 1: List of noise sources and their representative sound power levels

Source / Equipment Name	Sound Power Level (dBA)
Screening Plant	101
Stacker Loader	95
Wheel Loader	99

3.1.2 Results

The noise modelling in the *Hering Storer Acoustic Noise Assessment* (HAS 2025) has been calculated to comply with the Environmental Protection (Noise) Regulations 1997. These calculations have been based on the strictest criteria compliance during the night period. The report indicates that it is possible that the noise emissions, when received at the residences, are tonal in nature. In this case a +5 dB(A) penalty for tonality would be applied to the noise levels. This adjustment has been included in Table 2, and compliance with the regulations is still maintained.

Table 2 summarises the calculated and assessable noise levels for each of the receivers which each comply with their respective assigned noise levels of 45, 46 and 47 dB(A).

Table 2: Calculated and assessable levels of noise emissions at each receiver

Receiver	Calculated noise level (dBA)	Tonality Adjustment	Assessable Noise Level (dBA)	Assigned L _A 10 Level (dB)
R1	29	+5	34	45
R2	30	+5	35	45
R3	30	+5	35	46
R4	29	+5	34	47
R5	27	+5	32	45
R6	28	+5	33	45

3.1.3 DWER technical review

The department completed a technical review of the HSANA. The review found that the 6 residents / receivers located along the eastern end of the town selected for the noise compliance assessment seem appropriate and complete. The methodology utilised by Hering Storer Acoustic to conduct noise modelling was also determined to be reasonable.

The main concern as determined by the internal technical review was that the HSANA did not specify the models and makes of the noise sources for the noise modelling, although they were noted in the Screening Noise Management Plan (SNMP), drafted by the applicant. The SNMP notes the major noise sources would be the McCloskey S190 mobile screener, Edge FTS mobile stacker and Caterpillar 966 wheeled loader. The concern is that the HSANA underestimates the sound power levels (SWL) for these equipment items. For instance, the SWL levels are between 107 and 111 dB(A) for a Caterpillar 966 wheeled loader, as specified by the manufacturer, and much higher than the SWL of 99 dB(A) quoted in the HSANA.

As a result of the technical review it is considered that noise emissions from the proposed screening operation can be managed to comply with the Noise Regulations during daytime hours (7:00am to 7:00pm Monday to Saturday), however there is a risk that they will exceed the assigned noise levels or cause a significant impact on the neighbouring residences during nighttime hours (between 6:00am and 7:00am). Recommendations from the technical review included to restrict screening operations to commence only after 7:00am.

4. Air Quality

4.1 Dust management plan and internal review

4.1.1 Dust management plan

Due to previous complaints and confirmation of dust emissions reaching sensitive receptors a Dust Management Plan (DMP) was requested so that the department could undertake an internal air quality assessment. The DMP, provided by the applicant, details the topography and soils, climate, equipment, water resources used, a risk assessment and dust management actions, monitoring and corrective actions.

The mine site consists of undulating dunes up to 20 m high over a limestone caprock basement. The dunes are made up of limesand consisting of over 90 per cent calcium carbonate, used by farmers to reduce acidity generated by crop production.

Lancelin experiences a warm Mediterranean climate and consistent coastal winds, typically

prevailing morning easterlies and afternoon sea breezes from the southwest. Due to the strong winds a watercart already operates onsite to wet unsealed roads as required. This water is sourced from a production bore (GWL 180427) located in the compound at site with an annual water entitlement of 6,000 KI.

Dust emissions are expected to arise from specific activities such as truck movements, loading sand into the screener, feeding the stacker from the screener, stockpile forming and wind erosion from stockpiles.

The applicant has therefore proposed to implement dust management actions onsite to reduce dust emissions. These proposed controls are detailed in Table 3.

4.1.2 DWER technical review

The department completed a technical review of the DMP. The review found that the proposal is likely to be low risk and air quality monitoring is not recommended at this stage. Additionally, the distance between the proposal boundary and nearest sensitive receptors (Lancelin residents) appears to be greater than the recommended separation distance as per the *Guidance Statement No. 3 Separation Distances between Industrial and Sensitive Land Uses* (GS3) (EPA 2005).

GS3 specifies the separation distance to be the shortest distance between the boundary of the area that may potentially be used by industrial land use and the nearest sensitive receptor. For category 12 activities such as screening or sieving sand, rocks, chemicals and minerals the GS3 recommends a separation distance of 500 m. The applicant has stated that the nearest point of screening to town is approximately 800 m from residences.

The technical review considers that the proposed dust controls in the DMP are consistent with those described in the *Guideline for managing impacts of dust and associated contaminants from land development sites, contaminated sites remediation and other related activities* (DEC 2011).

4.2 Respirable crystalline silica

Silica is a name which collectively describes various forms of silicon dioxide, including both the crystalline and non-crystalline (amorphous) forms. Very small particles of the crystalline form of silica are referred to as respirable crystalline silica (RCS). RCS can cause serious illness at elevated concentrations.

The internal review, conducted by the department's Air Quality Branch, advised that advice be sought from the Department of Health (DoH) on the need for silica monitoring. In order to receive advice from the DoH, characterisation of the sand is required to determine if RCS monitoring is necessary. As a result, condition 16 has been included in the works approval which requires the applicant to collect samples at the premises to characterise the sand which can then be used to determine if monitoring is required.

5. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

5.1 Source-pathways and receptors

5.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction / installation and operation which have been considered in this decision report are detailed in Table 3 below. Table 3 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 3: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Installation of screening plant and associated equipment. Vehicle movements.	Air / windborne pathway	<ul style="list-style-type: none"> • Notice to be erected at the site, providing contact details of the person to be contacted regarding the works; • Induction for all employees prior to screening on the dust management actions; and • Water cart present and used during periods of elevated dust generation e.g. during windy conditions or increased traffic volumes.
Noise			Operate only during daytime hours. Between 7:00 am and 6:00 pm from Monday to Friday and 7:00 am and 12:00 pm on Saturdays.
Operation			
Dust	Operation of screening plant and associated equipment. Stockpile formation	Air / windborne pathway	<ul style="list-style-type: none"> • Areas of land cleared and the time they remain cleared is to be kept to a minimum; • Water carts present and used during periods of elevated dust generation e.g. during windy conditions or increased traffic volumes; • When loading sand into the screener and feeding the stacker, sand is to be dropped from low heights to minimise visible dust lift-off; • Stockpiles formed progressively in a controlled manner to reduce unnecessary rehandling and dust exposure; • Stockpiles to be located in naturally sheltered areas and, where possible, will be limited to the anticipated cubic volume / vehicle movement for cartage within a week; • Temporary stockpiles and exposed areas will be watered and stabilised as required; • Cease or reduce screening operations

Emission	Sources	Potential pathways	Proposed controls
			during periods of strong winds or unfavourable weather conditions; <ul style="list-style-type: none"> Truck trailers will be covered before leaving site; Vehicle speeds to be restricted to no more than 10 km/hr in the open loading area, and no more than 20 km/hr on the rest of the site; Maintain complaints register for the site; and Visual monitoring of dust throughout the day during operations with exceeding parameters recorded on a logging sheet.
Noise			Operate only during daytime hours. Between 7:00 am and 6:00 pm from Monday to Friday and 7:00 am and 12:00 pm on Saturdays.
Sediment laden stormwater		Overland runoff / direct discharge to land	Applicant has not proposed any controls.
Silica dioxide (respirable crystalline silica)		Air / windborne pathway	No controls specified in relation to respirable crystalline silica. Controls to reduce / minimise dust also apply here.
Hydrocarbon discharge / spills	Vehicle movements and refuelling of screening plant	Overland runoff and seepage into groundwater	<p>Applicant proposes that refuelling will be carried out with spill trays or portable containment mats under the refuel point with spill kits positioned at the plant and trained service personnel in attendance.</p> <p>The delegated officer notes that condition 31 and 34 of the Tenement Endorsement and Conditions for tenements M70/692 and M70/2025 states that no vehicle servicing or refuelling shall occur within the Lancelin Water Reserve (Public Drinking Water Source Area).</p> <p>Condition 12 of the works approval limits the refuelling within the PDWSA to the screening plant only. No refuelling of vehicles or storage of fuel is permitted within the PDWSA.</p>

5.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the applicant's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation. Figure 2 and Table 4 below provide a summary of potential human and environmental receptors that may be impacted as a result of activities

upon or emission and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)).

Table 4: Sensitive human and environmental and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential Premises	Approximately 800 m – 1000 m west of the screening zones within the prescribed premises boundary.
Lancelin Golf Course	1.2 km south of the screening zone within the prescribed premises boundary.
Environmental receptors	Distance from prescribed activity
Threatened/priority flora	<p><i>Conostylis pauciflora</i> subsp. <i>Euryrhipis</i>, <i>Stylidium maritimum</i> and <i>Hibbertia leptotheca</i> located over 1 km away from the premises boundary / screening zone.</p> <p>A flora species richness survey undertaken by Natural Area Management in 2017 that spanned across M70/250 and M70/692 indicated no rare, threatened or endangered species exist within the area.</p>
Threatened Fauna	Threatened fauna species recorded outside of the prescribed premises boundary – <i>Zanda latirostris</i> , <i>Anous stolidus</i> , <i>Thalasseus bergii</i> and <i>Sterna dougallii</i> .
PDWSA / Lancelin Water Reserve	Most screening zones are located on the Lancelin Water Reserve (PDWSA). All screening zones are located outside of the Wellhead Protection Zones.
TECs	Endangered - Sedgeland in Holocene dune swales of the southern Swan Coastal Plain (floristic community type 19 as originally described in Gibson et al. 1994).

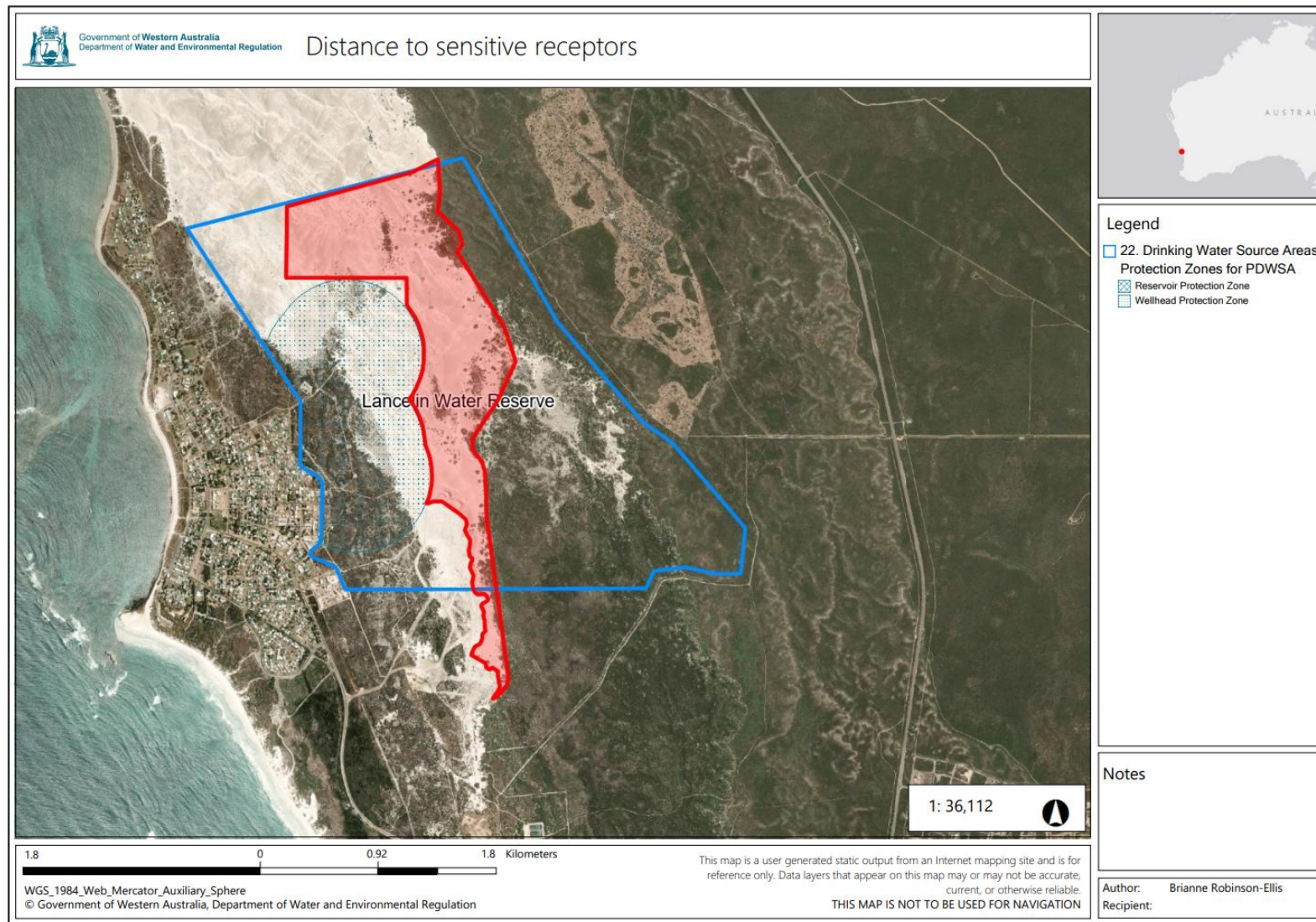


Figure 2: Distance to sensitive receptors (Public Drinking Water Source Area and Lancelin Water Reserve)

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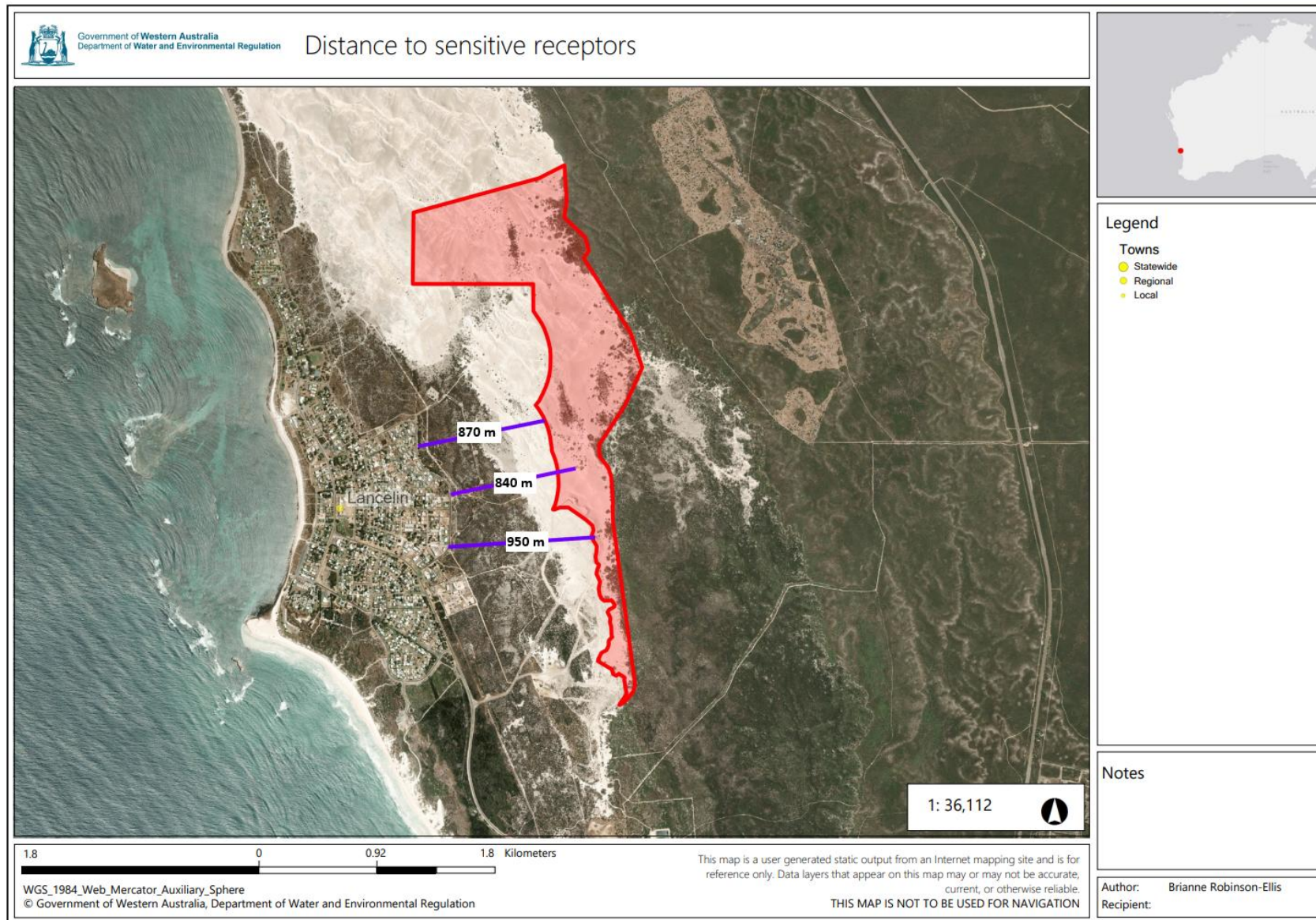


Figure 3: Distance to sensitive receptors from various screening zones within the prescribed premises boundary

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5.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 5.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls (as detailed in Section 5.1), these have been considered when determining the final risk rating. Where the delegated officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 5.

Works approval W3018/2025/1 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 5 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the premises i.e. screening activities. A risk assessment for the operational phase has been included in this decision report, however licence conditions will not be finalised until the department assesses the licence application.

Table 5: Risk assessment of potential emissions and discharges from the premises during construction and operation

Risk events					Risk rating ¹	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
Construction								
Placement and mobilisation of screening plant and associated equipment (including vehicle movements)	Dust	Pathway: Air/windborne pathway	Residences 800m west Golf course 1.2km south	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Y	Condition 1	N/A
	Noise	Impact: Health and amenity	Native vegetation PDWSA - Lancelin Water Reserve	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Y	Condition 1	N/A
Operation (including time-limited-operations operations)								
Screening, unloading, loading and storage of material Vehicle movements	Dust	Pathway: Air/windborne pathway	Residences 800m west Golf course 1.2km south Native vegetation	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Y	Conditions 1, 6, 7, 8, 9	N/A
	Noise	Impact: Health and amenity	Residences 800m west Golf course 1.2km south	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Y	Conditions 1, 6, 9	N/A
	Sediment laden stormwater	Pathway: Overland runoff Impact: Ecosystem disturbance or impact to surface water quality	Native vegetation PDWSA Lancelin Water Reserve	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	No proposed controls	Condition 10	No applicant controls proposed for stormwater management. Condition 10 has been added to provide sufficient control is undertaken during time limited operations to prevent stormwater becoming contaminated.
	Silica dioxide	Pathway: Air/windborne pathway Impact: Human	Residences 800m west Golf course 1.2km south	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	N	Conditions 1, 6, 7, 8, 9 Condition 16	The workplace exposure standard in Australia is 0.05 mg/m3 for respirable crystalline silica. Proposed regulatory controls for dust will assist in the reduction of

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Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
		health						dust generation and potential respirable crystalline silica (RCS) exposure. Condition 16 requires the works approval holder to sample the product in accordance with the requirements set out in Table 3 of the works approval. This will allow the department to seek advice on whether RCS monitoring is required.
Vehicle movements and refuelling of screening plant	Hydrocarbon discharge	Pathway: Overland runoff and seepage into groundwater Impact: Ecosystem disturbance or impact to surface / groundwater water quality. Contamination of public drinking water source.	Localised soils and groundwater PDWSA Lancelin Water Reserve	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	Conditions 1 and 6 <u>Condition 10, 11, 12 and 13</u>	Delegated officer considers that the proposed controls in relation to potential hydrocarbon discharge are not sufficient. Condition 10 has been added to provide sufficient control is undertaken during time limited operations to prevent stormwater becoming contaminated. Conditions 11 and 12 require the works approval holder to ensure any hydrocarbons are recovered immediately if spills occur and prohibit vehicle servicing and refueling within the Lancelin Water Reserve (PDWSA). Condition 12 requires the refuelling of the screener and stacker to be undertaken by a mobile refuelling service vehicle with spill containment in place. Condition 13, as recommended by the department's Water Source Protection Planning Branch, requires the works approval holder to report on any spills that occur within the PDWSA.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

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6. Consultation

Table 6 provides a summary of the consultation undertaken by the department.

Table 6: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 28 July 2025	None received	N/A
Local Government Authority – Shire of Gingin advised of proposal on 28 July 2025	The Shire of Gingin provided comments regarding the proposal on 08 August 2025, please refer to Appendix 1.	Refer to Appendix 1
Department of Mines, Petroleum and Exploration (DMPE) advised of proposal 28 July 2025	None received	N/A
Residential addresses advised of proposal by mail on 28 July 2025	None received	N/A
Applicant was provided with draft documents on 29 October 2025	<p>Comments were received on 30 October 2025.</p> <ul style="list-style-type: none"> The applicant requested an amendment to condition 12 to allow refuelling of the screener and stacker on site where undertaken by a mobile refuelling service vehicle with spill containment in place and no fuel stored onsite. Premises Boundary Vertices were provided on 11 November 2025. 	<ul style="list-style-type: none"> The delegated officer deems the applicant's request to be reasonable as it applies to refuelling of the screening plant and stacker in the Priority 1 area and not within the Wellhead Protection Zones. <p>The request was referred to the departments' Water Source Protection Planning Branch (WSPPB). A condition requiring the reporting of any spills was recommended and as a result, added to the works approval as condition 13. The WSPPB also noted that the applicants spill procedure should consider/refer to WQPN 10 – Contaminant spills – emergency response plan, and WQPN 65 – Toxic and hazardous substances.</p> <ul style="list-style-type: none"> Premises Boundary Vertices were added to Schedule 2 of the works approval.

7. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a works approval will be granted, subject to conditions commensurate with the determined

controls and necessary for administration and reporting requirements.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2021, *Water Quality Protection Note 25 Land Use Compatibility in Public Drinking Water Source Areas*, Perth, Western Australia
5. Herring Storer Acoustics (HSA) 2025, *Aglime Lancelin Minesite Noise Management Plan*, Como, Western Australia.
6. Environmental Protection Authority (EPA) 2005, *Guidance Statement No. 3 Separation Distances between Industrial and Sensitive Land Uses*, Perth, Western Australia.
7. Department of Environment and Conservation (DEC) 2011, *A guideline for managing the impacts of dust and associated contaminants from land development sites, contaminated sites remediation and other related activities*, Perth, Western Australia.

Appendix 1: Summary of comments from stakeholder consultation

Stakeholder	Summary of concern/issue	Department's response
Shire of Gingin (LGA)	<p>The Shire has raised the concern that operating hours within the Screening Noise Management Plan (SNMP) prepared by Aglime of Australia differ from the Herring Storer Acoustic Noise Assessment (HSANA), namely the following:</p> <p>SNMP: 6:00 am – 6:00 pm (Monday – Friday) and morning – midday (Saturday).</p> <p>HSANA: Table 3.1 references 7:00 am – 7:00 pm (Monday – Saturday).</p> <p>Clause 6 suggests that screening should run after 7:00 am. The Shire believes the operating hours ought to be reviewed to align with the acoustic assessment and suggests that a conservative position be adopted given proximity to sensitive receptors.</p>	<p>The Department notes the difference in operating times in the Screening Noise Management Plan (SNMP) and the Herring Storer Acoustic Noise Assessment (HSANA).</p> <p>Condition 7 of works approval W3018/2025/1 limits the hours of operation of the screening plant at the premises to only occur between the hours of 7:00 am and 6:00 pm on the days of Monday through to Friday, and 7:00 am and 12:00 pm on Saturdays.</p> <p>No activities are to occur on Sundays or Public Holidays.</p>
	<p>The Shire is of the view that the SNMP should address noise generated by heavy haulage vehicles and plant accessing the site, not simply screening activities. The Shire suggests the overall development should have operating limitations given trucks are likely to visit the site late at night and early morning to avoid loading delays, potentially disturbing the amenity of the locality.</p>	<p>Activities outside of screening operations are not within the scope of Part V of the <i>Environmental Protection Act 1986</i>.</p>
	<p>The Shire is of the view that prevailing Easterly winds during the limesand season has not been factored into the acoustic modeling. The Shire is concerned that localised weather modelling may influence the findings of the acoustic report and/or the appropriateness of a reduced separation distance.</p>	<p>An internal review of the Screening Noise Management Plan (SNMP) and the Herring Storer Acoustic Noise Assessment (HSANA) were undertaken by the Department.</p> <p>This review found that the proposed controls were appropriate and supported, particularly if the screener was only run after 7:00 am.</p> <p>The Department has limited the hours of operation to after 7:00 am, as per condition 7 of the works approval.</p>
	<p>The Screening Dust Management Plan (SDMP) prepared by Aglime of Australia outlines operating hours that differs from the SNMP. The suite of documents should align.</p>	<p>The applicant was required by the Department to submit a revised Screening Dust Management Plan (SDMP).</p>

Stakeholder	Summary of concern/issue	Department's response
		The Department notes this difference and has added condition 7 to the works approval to limit the hours of operation as noted above.
	The Shire is concerned that the 'climate' references in the SDMP are not substantiated and fail to acknowledge the intense Easterly winds that prevail during the limesand operating period.	<p>The applicant was required, by the Department, to submit a revised Screening Dust Management Plan (SDMP), specifically to elaborate on the localised climate and acknowledge the Easterly winds.</p> <p>This revised dust management plan underwent an internal technical review which found the proposed dust controls sufficient to minimise risk associated with screening activities.</p>
	The SDMP outlines that a dust suppression method may be to apply water. The information fails to address the water source, which is typically via a water license of sufficient size. The Shire recommends that sprinklers on the screening equipment should be considered.	<p>The applicant was required, by the Department, to submit a revised Screening Dust Management Plan (SDMP), to include information to specify where water for dust suppression is sourced from.</p> <p>The revised dust management plan noted that water is to be sourced from a production bore (GWL 180427) located in the compound on site, with an annual water entitlement of 6,000 kL.</p> <p>Condition 9 of the works approval ensures that a water cart is available at all times to wet down the site as required.</p>
	The SDMP outlines that activity may be ceased in unfavorable weather conditions at the discretion of the supervisor. The Shire suggests that unfavorable weather conditions should be identified and form a licence condition to ensure a compliance mechanism is available.	<p>The Department notes the Shire's concern in relation to the cessation of activities during unfavourable weather conditions.</p> <p>Condition 9 of Works Approval W3018/2025/1 requires the works approval holder to manage dust at the premises by ceasing dust-generating activities during strong wind conditions in excess of 40 km/hr.</p>
	The Shire has concerns that the Dust Management Plan is inadequate to provide a high level of confidence that dispersal of dust will not cause amenity impacts within the locality.	<p>The revised DMP underwent an internal technical review which found that the proposed dust controls are consistent with those described in the (DEC 2011) <i>A guideline for managing impacts of dust and associated from land development sites, contaminated sites remediation and other related activities</i>.</p> <p>The Department has included conditions 1, 6, 8, 9 and 16 in the</p>

Stakeholder	Summary of concern/issue	Department's response
		works approval in relation to the management of dust emissions.
	<p>Appendix 1 of the <i>Guidance for the Assessment of Environmental Factors - Separation Distances between Industrial and Sensitive Land Uses No 3</i> (EPA Guidance Statement) outlines a buffer distance of 1000m for screening activities. The Shire has expressed that departure from this distance should only be considered when decision makers have a high degree of confidence that technical studies demonstrate that adverse impacts will not arise.</p> <p>The Shire has expressed concerns that given the discrepancies as listed above, the Shire does not have any such confidence that a reduced buffer is appropriate.</p>	<p>The <i>Guidance Statement No. 3: Separation Distances between Industrial and Sensitive Land Uses</i> (GS3; EPA 2005) recommends a separation distance of 500 m for screening or sieving sand, rocks, chemicals, and minerals (Category 12).</p> <p>A buffer of approximately 800 m exists between the screening zones and the closest residential receptors.</p> <p>Please note that only screening operations are within the scope of the Part V risk assessment.</p>
	The Shire is of the view that potentially impacted stakeholders should be consulted, in particular the sensitive receptor as listed in Table 3.3 of the HSANA.	<p>The Department sent letters, inviting the comments from the closest resident stakeholders that would potentially be impacted. These residents were advised of the proposal on 28 July 2025.</p> <p>No comments were received in relation to the proposal.</p>