

22 July 2020

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Dear Sir/Madam,

RE: SUBMISSION TO WYNDHAM STRATEGIC EXTRACTIVE RESOURCE AREA PILOT PROGRAM - 78 NEWTONS ROAD, LITTLE RIVER

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Our clients have reviewed the material that has been placed on exhibition and would seek to contest the conclusions drawn regarding the boundaries of the proposed State Resource Overlay (SRO).

It is their view that the overlay should apply to all the area that has been identified as both an Extractive Industry Interest Area (EIIA) and a strategic resource.

In particular, they dispute the depiction of the SRO boundary seemingly following areas identified for the Western Plains Grasslands. Such an approach is a denial of the natural resources that underlays all of the area to the north east of Little River. There is no evidence to show that the land proposed to be included in the SRO, and land proposed to be excluded from the SRO are any different in geological characteristics or commercial value.

In undertaking an orderly and strategic planning process, the first task is to recognise the totality of the constraints and opportunities presented by a study area. In this regard the planning scheme should recognise that our client's land has both significance for its environmental attributes as

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grassland, and by virtue of the significance of the rock that underlays the Site.

The presence of an existing Public Acquisition Overlay (PAO7) for the purposes of the community's ownership of the Western Plains Grasslands should not be used to avoid recognition of the Site's natural resource value. To do otherwise, is to prejudge future decisions regarding the Site's value.

Recognising the Site's natural rock assets does not preclude government acquiring the land for its environmental value, but it does ensure that the totality of the Site's attributes are properly recognised.

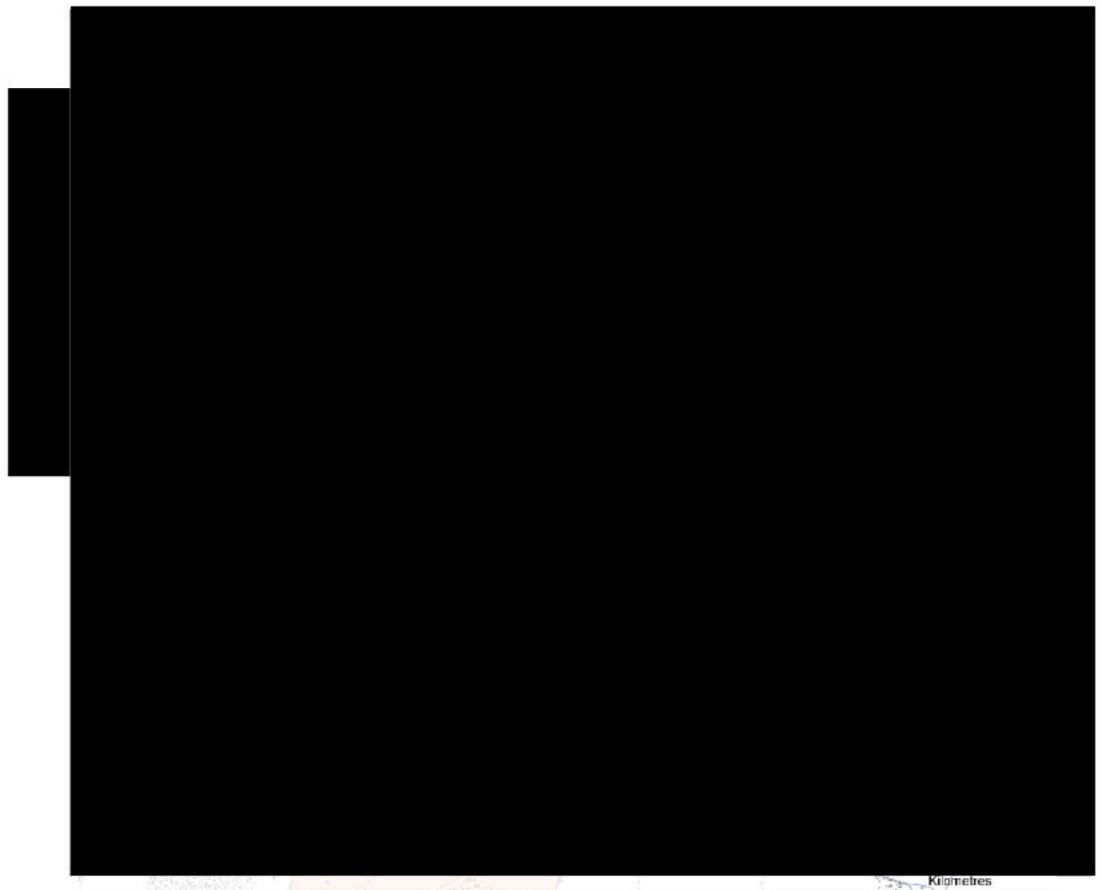


Figure 1: The Site identified within the SERA Planning Provision Application (proposed)



It is our understanding that this submission forms part of the considerations that will be the output of the pilot study and this process does not amount to a planning scheme amendment. We anticipate that a formal planning scheme amendment might follow and we would expect the concerns raised in this advice to be considered by the relevant Minister and our client reserves the right to have their concerns reviewed by an independent panel.

Thank you for the opportunity to make this submission and please confirm its receipt and the process going forward for the consideration of this and other submissions.

