FORMAL OBJECTION

Proposed change under section 43A of the ***Environmental Protection Act 1986***

Gonneville Nickel-Copper-Platinum Group Element Project

Submitted by	Shire of Chittering
Proponent	Chalice Mining Limited
Decision-maker	Environmental Protection Authority
Submission date	26 October 2026

The Shire objects to approval of the revised Infrastructure Development Envelope on the information presently available.

Submission concerning the adequacy of mapping, identification of the existing subdivision and retained vegetation, assessment of social surroundings, and consideration of alternative corridors.

Environmental Protection Authority Western Australia

Re: Gonneville Nickel-Copper-Platinum Group Element Project — proposed change under section 43A Formal objection

The Shire of Chittering objects to approval of the proposed section 43A amendment in its present form. The objection is directed particularly to the revised Infrastructure Development Envelope, which would consolidate the referred water pipelines and power transmission line within a co-located corridor.

The Shire is concerned that the amendment material does not accurately or adequately portray the existing receiving environment through which the revised corridor would pass. In particular, the mapping available to the Shire does not appear to show the subdivision that has been created in the affected area, the resulting pattern of landholdings and community receptors, or the Tree Preservation Area and potential Black Cockatoo nesting trees identified and protected through the subdivision planning and environmental management framework.

These omissions are material. They may understate the nature, location and significance of impacts on social surroundings, landscape and visual amenity, retained vegetation, habitat values and environmental management outcomes established through the statutory subdivision process.

The Shire therefore requests that the EPA not approve the revised Infrastructure Development Envelope under section 43A unless and until the proponent has provided current and accurate mapping, assessed the affected subdivision and retained vegetation, and demonstrated through a transparent alternatives assessment why the selected corridor is environmentally preferable to the other corridors previously considered.

Requested outcome

- Do not approve the revised Infrastructure Development Envelope on the present information.
- Have regard to Council's formally adopted position that Gonneville Project-associated infrastructure should not be located within the Shire of Chittering, and that alternative infrastructure and transport corridor solutions should be located outside the Shire.
- Require corrected, current mapping and a site-specific assessment of environmental and social-surroundings impacts.
- Require a comparative assessment of the selected corridor against the alternative corridors previously investigated.
- If the change is environmentally significant, do not deal with it as a section 43A amendment.

1. Scope of this objection

The Shire recognises that the present consultation concerns whether the proposed amendment results in new environmental factors or potential impacts in relation to the proposal already under assessment. This objection is framed accordingly.

The issue is not merely whether the revised corridor changes the total project footprint. Relocating and consolidating infrastructure can change where impacts occur, which environmental values are affected, who experiences the impacts, and whether effects become concentrated or cumulative within a particular receiving environment.

2. Inadequate representation of the existing subdivision

The Shire is concerned that the mapping supporting the amendment does not appear to depict the subdivision that has been created in the area affected by the revised corridor. Current Shire mapping and aerial imagery show a materially more developed subdivision pattern, including Songlark Circuit, Goldfinch Rise and Wattlebird Boulevard, together with the resulting rural-residential parcels. These features are absent from the mapping presented in the amendment material, notwithstanding that the revised Infrastructure Development Envelope traverses this area and runs along the rear of newly created rural-residential parcels. As a result, the amendment material may not accurately show the current cadastral configuration, pattern of landholdings,

development potential, residences or other sensitive receptors, access arrangements, and community context of the affected land.

The environmental assessment must be based on the environment that exists at the time of the amendment, not an earlier or incomplete representation of the land. In the area of concern, the section 43A mapping presents the land principally as a broad Rural Residential area, while current Shire mapping and aerial imagery show the additional road network and a more defined rural-residential subdivision pattern. The omission of that current subdivision context may materially affect the assessment of social surroundings, visual amenity, landscape character and the distribution of impacts among landowners and residents.

The Shire does not assert, without further evidence, that the omission was intentional. However, irrespective of how it occurred, the consequence is that the EPA may not presently have a complete and reliable basis on which to assess the revised corridor.

3. Trees and vegetation protected through subdivision

Trees and vegetation were deliberately retained and protected when the subdivision was created. The endorsed Development Plan defines Tree Preservation Areas as all naturally vegetated areas. Within those areas, no clearing of trees larger than 150 mm diameter measured at 1.2 m above natural ground level is permitted outside designated building envelopes, other than for roads, driveways and firebreaks. The Development Plan also identifies potential Black Cockatoo nesting locations and provides that those trees shall not be removed without specific approval of Council. The Environmental Management Plan reinforces these requirements and identifies significant vegetation, watercourses and potential cockatoo nesting sites as environmental values to be preserved during and after development. The revised Infrastructure Development Envelope passes through the Tree Preservation Area identified on the Development Plan.

The vegetation-protection framework is also supported by earlier environmental investigation of Lots 3 and 4 Maddern Road. The March 1997 Native Flora Report records that an earlier land capability assessment had identified areas of good quality native vegetation and recommended clearing restrictions and other management practices be incorporated into the Special Rural design. The flora report records remnant native vegetation on the property and recommends retention of native species diversity through clearing restrictions in wooded areas. This provides additional context for the subsequent designation of Tree Preservation Areas and clearing controls in the Development Plan.

The age of that survey also warrants caution in relying upon it as an assessment of the present conservation significance of the retained vegetation. The report recorded 128 native plant species and stated that, at the time of survey, none of the recorded flora was included on the then Declared Rare Flora or Priority Flora lists. Flora taxonomy and conservation status have changed materially since that work was undertaken.

For example, the survey recorded Calectasia cyanea. The taxon presently recognised by that name is listed as Threatened in Western Australia and Critically Endangered under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*. A 2001 taxonomic revision of Calectasia recognised eleven species and described eight new species from south-west Western Australia. Current Commonwealth information also records that Calectasia cyanea was historically considered more widespread because of misidentification with Calectasia narragara.

The Shire does not assert that the plant recorded in the 1996 survey is the taxon presently recognised as Calectasia cyanea. Rather, the historical record demonstrates that the earlier survey cannot safely be relied upon, without contemporary taxonomic verification, to establish the current conservation significance of vegetation that may be disturbed by the revised Infrastructure Development Envelope. The Shire therefore requests a contemporary flora and vegetation survey, including appropriate targeted survey for conservation-significant taxa and review of historical records against current taxonomy, before disturbance of the identified Tree Preservation Area is contemplated.

This is not simply a question of isolated trees. The affected vegetation forms part of a formally identified Tree Preservation Area established through the subdivision planning framework. The Development Plan requires potential Black Cockatoo nesting trees on lots shown on the plan not to be removed without specific Council approval, and provides that building envelopes should, where possible, be located to avoid native trees. The Environmental Management Plan further provides that buildings are generally to be located outside tree preservation zones and that additional firebreaks are not permitted in tree preservation zones or where removal of native vegetation would be required. The routing of the revised corridor through this area therefore engages environmental values and vegetation-management outcomes that are not apparent from the section 43A mapping.

The Shire requests that the proponent be required to accurately map the Tree Preservation Area and potential Black Cockatoo nesting locations against the revised Infrastructure Development Envelope; identify the location, extent, condition and status of vegetation affected by the corridor; quantify direct and indirect disturbance; and explain how the mitigation hierarchy of avoid, minimise, rehabilitate and offset has been applied, including why the identified Tree Preservation Area cannot be avoided.

4. Social surroundings and landscape effects

The omission of the subdivision and retained vegetation may cause the social and landscape consequences of the corridor to be understated. A co-located power and water corridor may have different effects from dispersed infrastructure, including through its scale, visibility, construction disturbance, ongoing access requirements, vegetation removal and relationship to existing and future rural living development.

The Shire considers that the assessment should identify affected landholdings and sensitive receptors, examine views and landscape character, consider community use and enjoyment of the area, and assess whether the

revised location produces new or materially different impacts compared with the proposal as previously referred.

The Shire also requests assessment of cumulative effects where the revised corridor interacts geographically or functionally with other reasonably foreseeable Gonneville-associated infrastructure and activities.

5. Alternative corridors remain relevant

The Shire's request for assessment of alternative corridors should not be interpreted as support for any alternative alignment within the Shire of Chittering. Council has formally resolved to oppose the location of Gonneville Project-associated infrastructure within the Shire, including the use of roads within the Shire as a freight or transport corridor, and to advocate for alternative infrastructure and transport corridor solutions outside the Shire of Chittering.

The Shire understands from the proponent's engagement and earlier investigations that other potential infrastructure corridors were considered. The existence of those options is relevant to whether impacts associated with the selected corridor can be avoided or materially reduced.

The Shire requests a consistent comparative assessment of the selected and alternative corridors using current cadastral, land-use, vegetation, biodiversity, hydrological, landscape and social-surroundings information, including the endorsed Development Plan, Tree Preservation Area and potential Black Cockatoo nesting locations. The assessment should disclose the criteria and weightings used, identify environmental constraints and affected receptors, and explain why the selected corridor represents the best environmental outcome.

The Shire nevertheless considers that the alternative corridors previously investigated by the proponent remain relevant to the EPA's consideration of the proposed section 43A amendment. A transparent comparison may assist in determining whether the selected corridor unnecessarily concentrates or increases impacts on the established subdivision, Tree Preservation Area, potential Black Cockatoo nesting locations and community receptors. However, the Shire does not nominate or endorse any of those alternative corridors as a preferred outcome where they are also located within the Shire of Chittering. Council's adopted position remains that Gonneville Project-associated infrastructure should be located outside the Shire. The proponent should first provide a transparent, like-for-like assessment of the available options.

6. Significance of the proposed change

The revised corridor should not be characterised as merely an administrative consolidation of infrastructure. A change in location and configuration may be environmentally significant where it exposes different environmental values or communities to impact, or where the supporting information does not permit those impacts to be reliably understood.

If corrected mapping and alternatives analysis identify new environmental factors, materially different impacts, or a change of such significance that it cannot appropriately be dealt with under section 43A, the Shire submits that the amendment should not be approved through that process.

7. Information requested before any decision

Before determining the amendment, the Shire requests that the EPA require the following information:

Required information	Purpose
Current cadastral and subdivision mapping	Show approved and created lots, roads, reserves, easements, residences, development sites and other sensitive receptors.
Retained vegetation mapping	Identify trees and vegetation protected or retained through subdivision conditions, plans, covenants, notifications or other statutory mechanisms, including the Environmental Management Plan applying to the subdivision.
Impact assessment	Quantify direct and indirect effects on vegetation, fauna habitat, waterways and environmental values identified in the Environmental Management Plan, as well as landscape, amenity and social surroundings.
Alternatives assessment	Compare the selected corridor with the alternatives previously investigated, and identify whether reasonable infrastructure corridor solutions outside the Shire of Chittering have been investigated. The assessment should use consistent environmental and social criteria and explain the basis for selecting the proposed corridor.
Avoidance and minimisation response	Demonstrate how the alignment has been modified to avoid established subdivision, protected vegetation and sensitive receptors.
Consultation record	Explain engagement with affected landowners and the Shire, matters raised, and how those matters influenced route selection.
Contemporary flora and vegetation survey	Assess vegetation potentially affected by the revised corridor, including targeted survey for conservation-significant flora and review of historical records against current taxonomy.

8. Conclusion and formal request

The Shire's objection is not based solely on a preference against the selected alignment. It is based on a concern that the environmental significance of the revised corridor cannot be reliably assessed where the mapping does not accurately portray the current subdivision, affected community, or the Tree Preservation Area and potential Black Cockatoo nesting locations established through the subdivision planning and environmental management framework, particularly where the revised corridor passes through that Tree Preservation Area.

The concentration of water and power infrastructure into a revised corridor is capable of producing new, relocated or cumulative impacts. Those impacts must be assessed against the current receiving environment and compared transparently with reasonable alternatives.

The Shire of Chittering formally requests that the EPA:

- not approve the revised Infrastructure Development Envelope on the information presently available;
- require corrected and current mapping and a complete assessment of the subdivision, Tree Preservation Area, potential Black Cockatoo nesting locations, retained vegetation and social surroundings;
- require a contemporary flora and vegetation survey, including targeted survey for conservation-significant taxa and review of historical flora records against current taxonomy;
- have regard to Council's formally adopted position that Gonneville Project-associated infrastructure should not be located within the Shire of Chittering, and that alternative infrastructure and transport corridor solutions should be located outside the Shire;
- require the proponent to explain why the selected corridor was preferred over the alternative corridors previously investigated and whether those alternatives would avoid or reduce the environmental and social impacts identified by the Shire, while recognising that the Shire does not support or endorse any alternative corridor located within the Shire of Chittering;
- require the proponent to demonstrate how impacts on the identified Tree Preservation Area, potential Black Cockatoo nesting trees and sensitive receptors have been avoided or minimised, including through consideration of infrastructure corridor solutions outside the Shire of Chittering; and
- if the amendment is found to be environmentally significant, decline to approve it under section 43A and require the appropriate level of assessment.

Yours faithfully



Melinda Prinsloo
Chief Executive Officer
Shire of Chittering

Schedule 1 — Supporting documentary evidence

The following documentary and mapping material accompanies or is reproduced in this submission and supports the factual basis of the objection:

- Environmental Management Plan “Maryville Heights” (Amended September 2023).
- Endorsed Modified Development Plan for Lots 3 and 4 Maddern Road, Lower Chittering, including the Tree Preservation Areas, development provisions and mapped potential Black Cockatoo nesting locations.
- Native Flora Report, Lots 3 and 4 Maddern Road, Chittering (March 1997), including the recorded species list and recommendations for native vegetation retention and clearing restrictions.
- Contemporary taxonomic and conservation-status references: DBCA FloraBase profile for Calectasia cyanea; Barrett and Dixon (2001), taxonomic revision of Calectasia; and the Australian Government SPRAT profile for Calectasia cyanea.
- Relevant section 70A notification recording that affected land is subject to an Environmental Management Plan.
- Current Shire aerial imagery showing the constructed road network and subdivision works in the area of concern.
- Current Shire land-use mapping showing Songlark Circuit, Goldfinch Rise and Wattlebird Boulevard.
- Current Shire land-use mapping with cadastral boundaries showing the created rural-residential parcel pattern.
- Current aerial imagery with cadastral boundaries showing the relationship between the subdivision, individual parcels and retained vegetation.
- Section 43A land-use and aerial mapping reproduced for comparison with current Shire information.
- Council Resolution 111026 — Council resolution formally opposing the location of Gonneville Project-associated infrastructure within the Shire of Chittering, including the use of roads within the Shire as a freight or transport corridor, and directing continued advocacy for alternative infrastructure and transport corridor solutions outside the Shire of Chittering.

Schedule 2 — Mapping comparison

The following figures compare the mapping presented in the section 43A supporting material with current Shire aerial, land-use and cadastral mapping of the area of concern. Together they illustrate the additional road network and rural-residential parcel pattern that are not shown in the section 43A mapping.

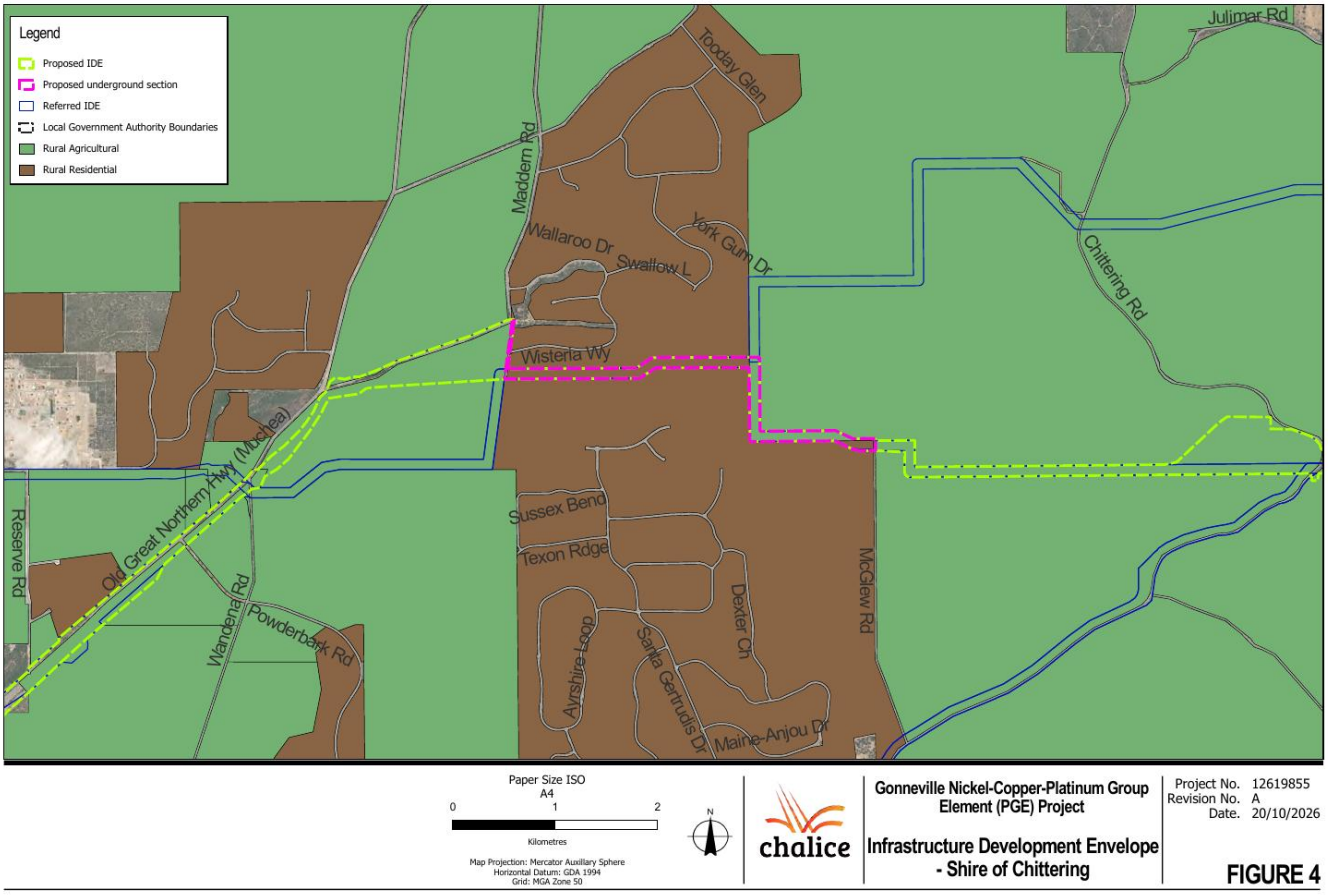


Figure S2-1 — Land-use mapping presented in the section 43A supporting material

The affected area is presented principally as a broad Rural Residential area. The later internal road layout, including Songlark Circuit, Goldfinch Rise and Wattlebird Boulevard, is not shown.

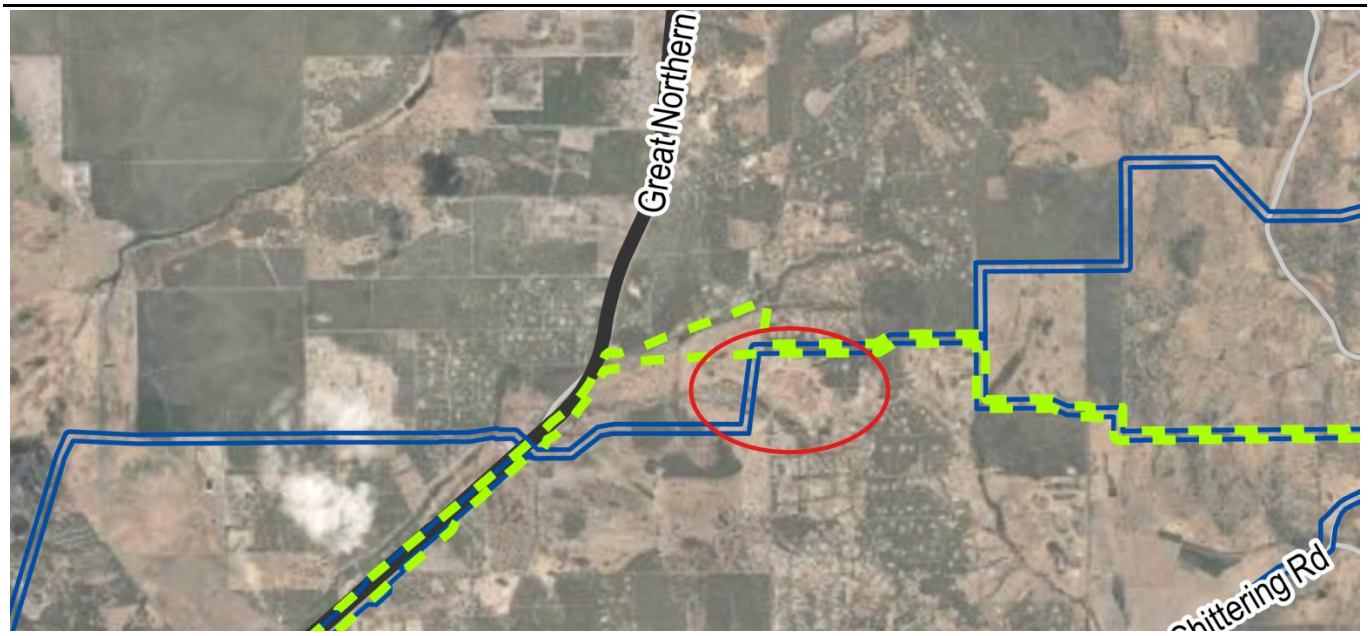


Figure S2-2 — Aerial mapping presented in the section 43A supporting material

The section 43A aerial base and revised/referred infrastructure envelopes in the area of concern.

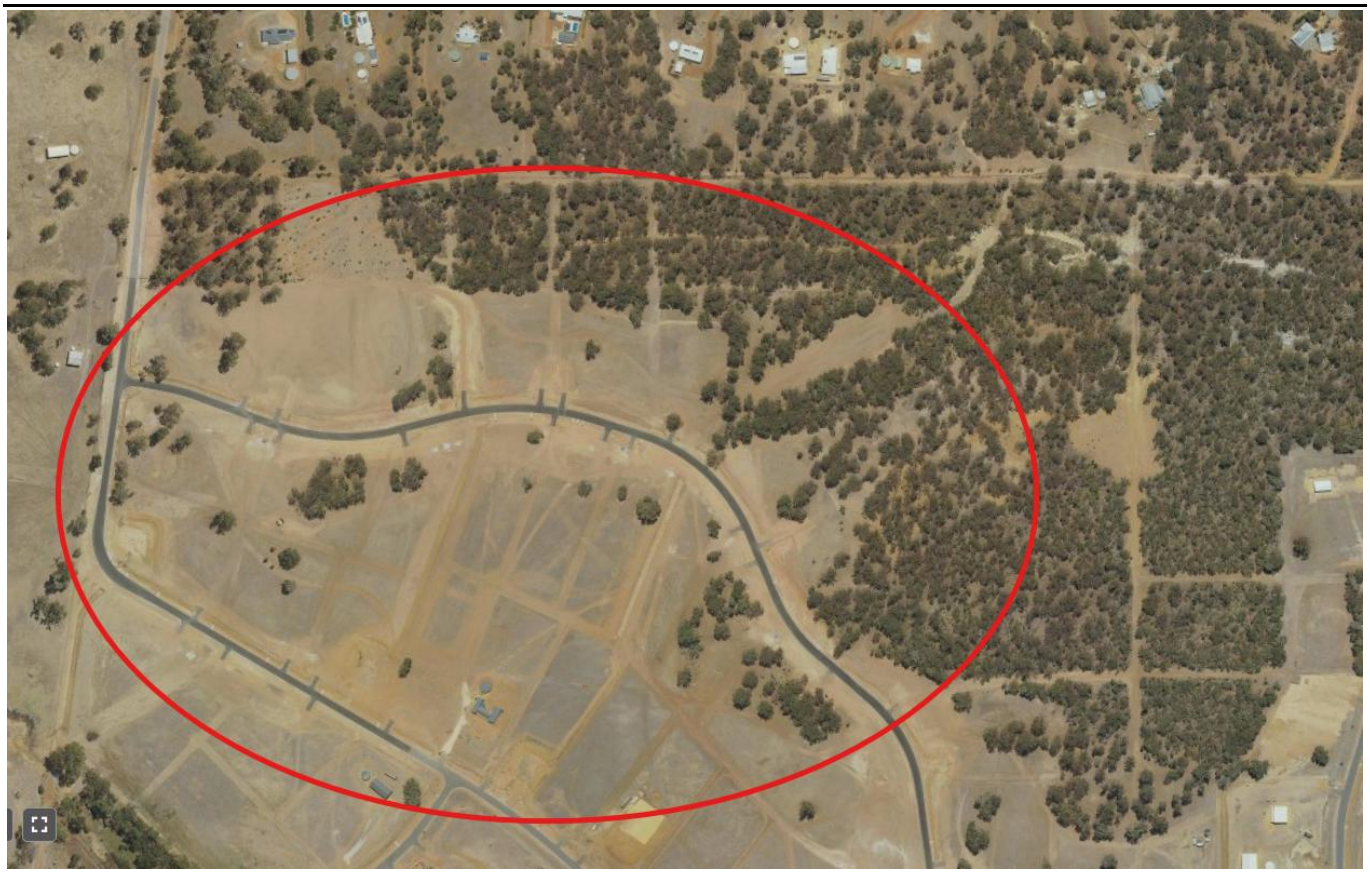


Figure S2-3 — Current aerial imagery of the area of concern

Current aerial imagery shows the constructed internal road network and subdivision works in the area of concern.

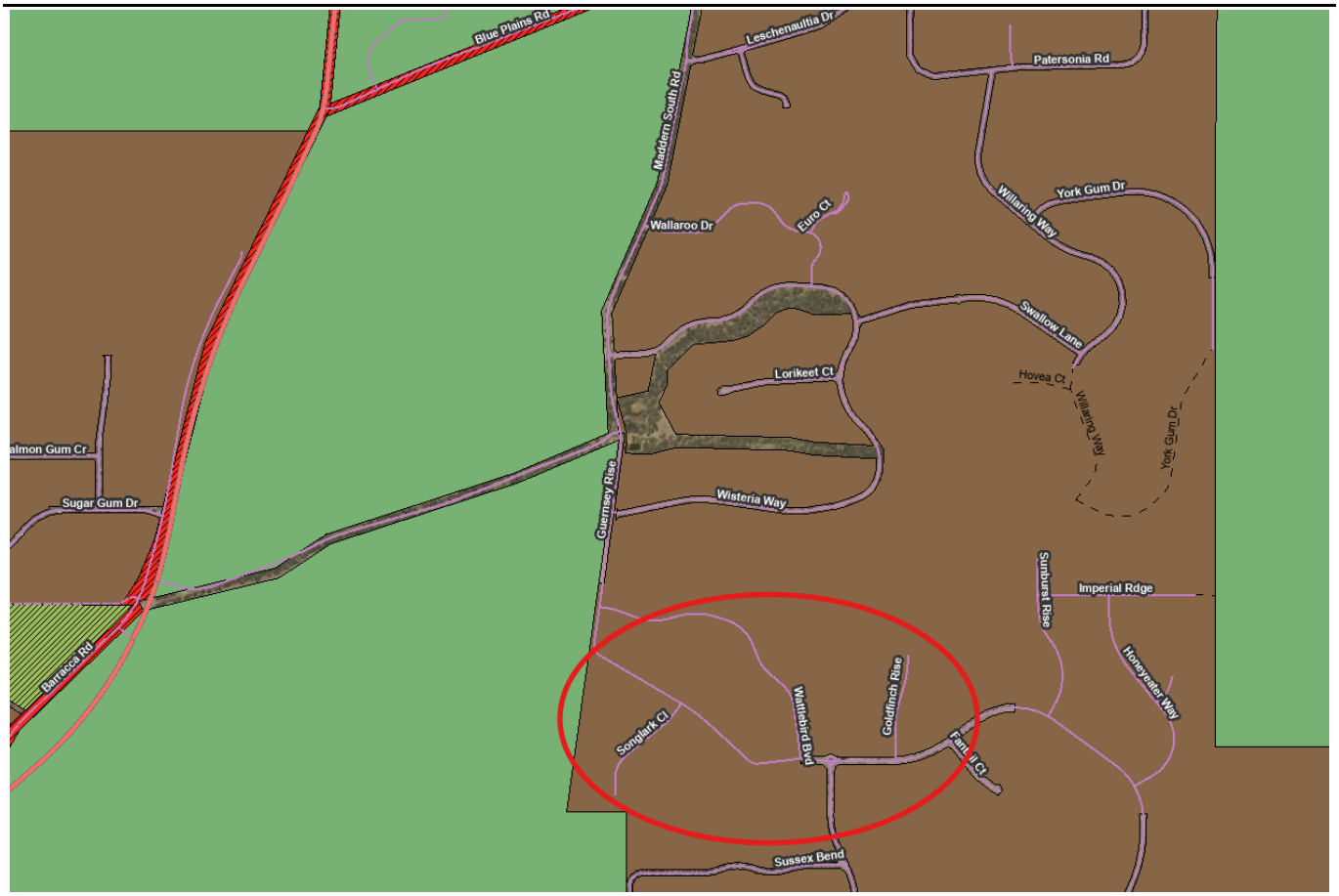


Figure S2-4 — Current Shire land-use mapping

Current Shire land-use mapping shows Songlark Circuit, Goldfinch Rise and Wattlebird Boulevard within the rural-residential area.

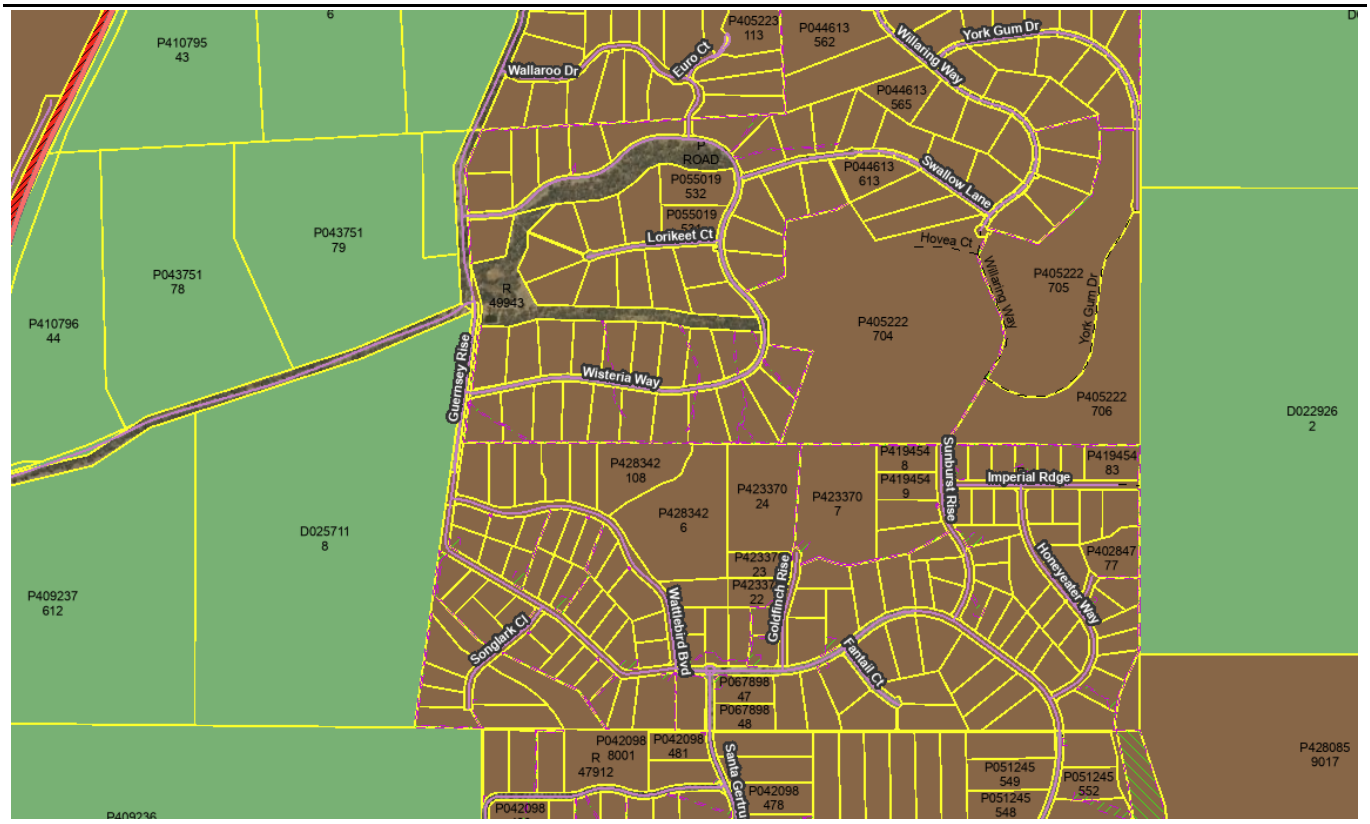


Figure S2-5 — Current Shire land-use mapping with cadastral boundaries

Current cadastral boundaries demonstrate the defined rural-residential parcel pattern around Songlark Circuit, Wattlebird Boulevard and Goldfinch Rise.

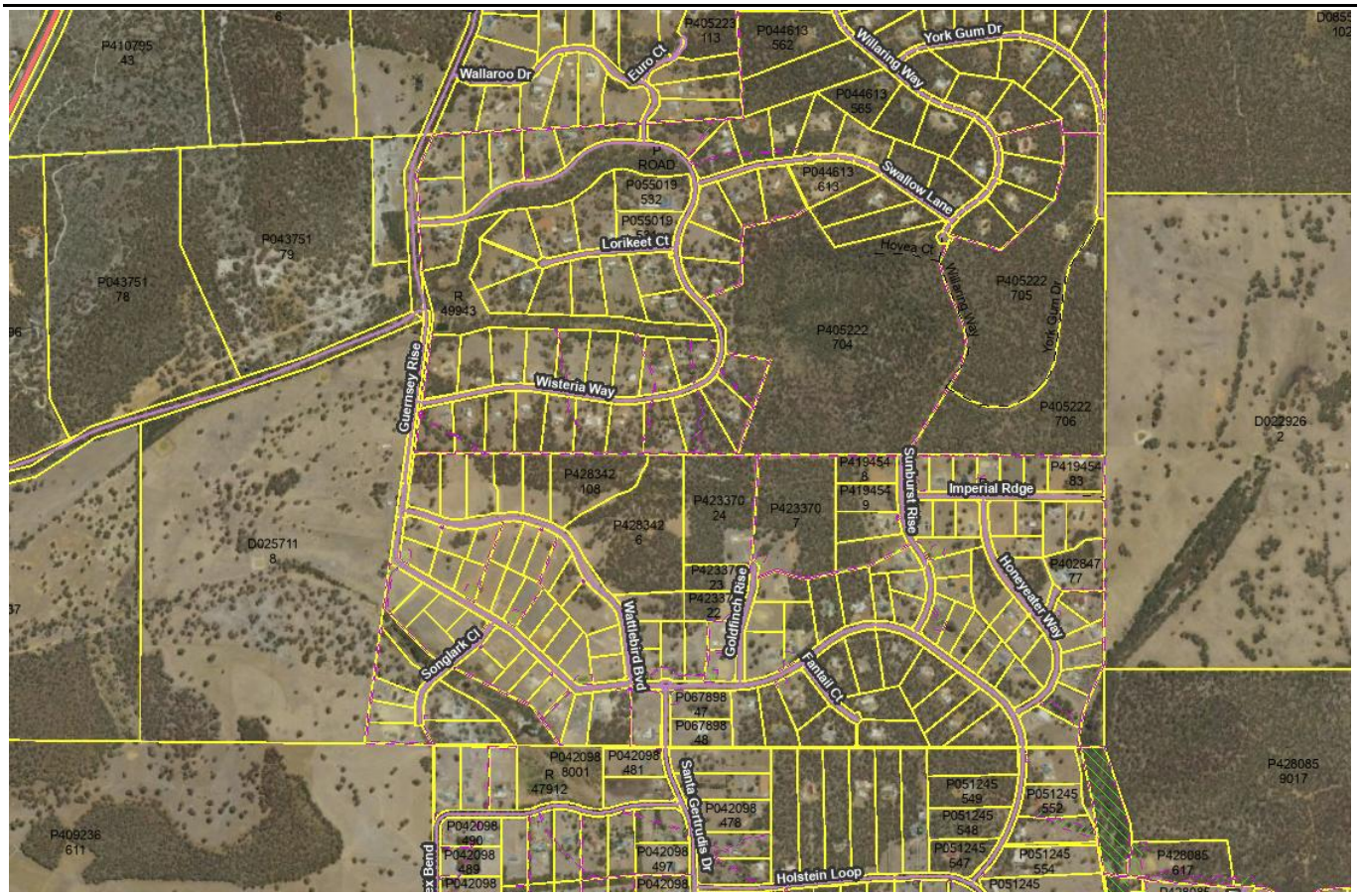


Figure S2-6 — Current aerial imagery with cadastral boundaries

Current aerial imagery with cadastral boundaries illustrates the relationship between the constructed subdivision, individual parcels and retained vegetation.

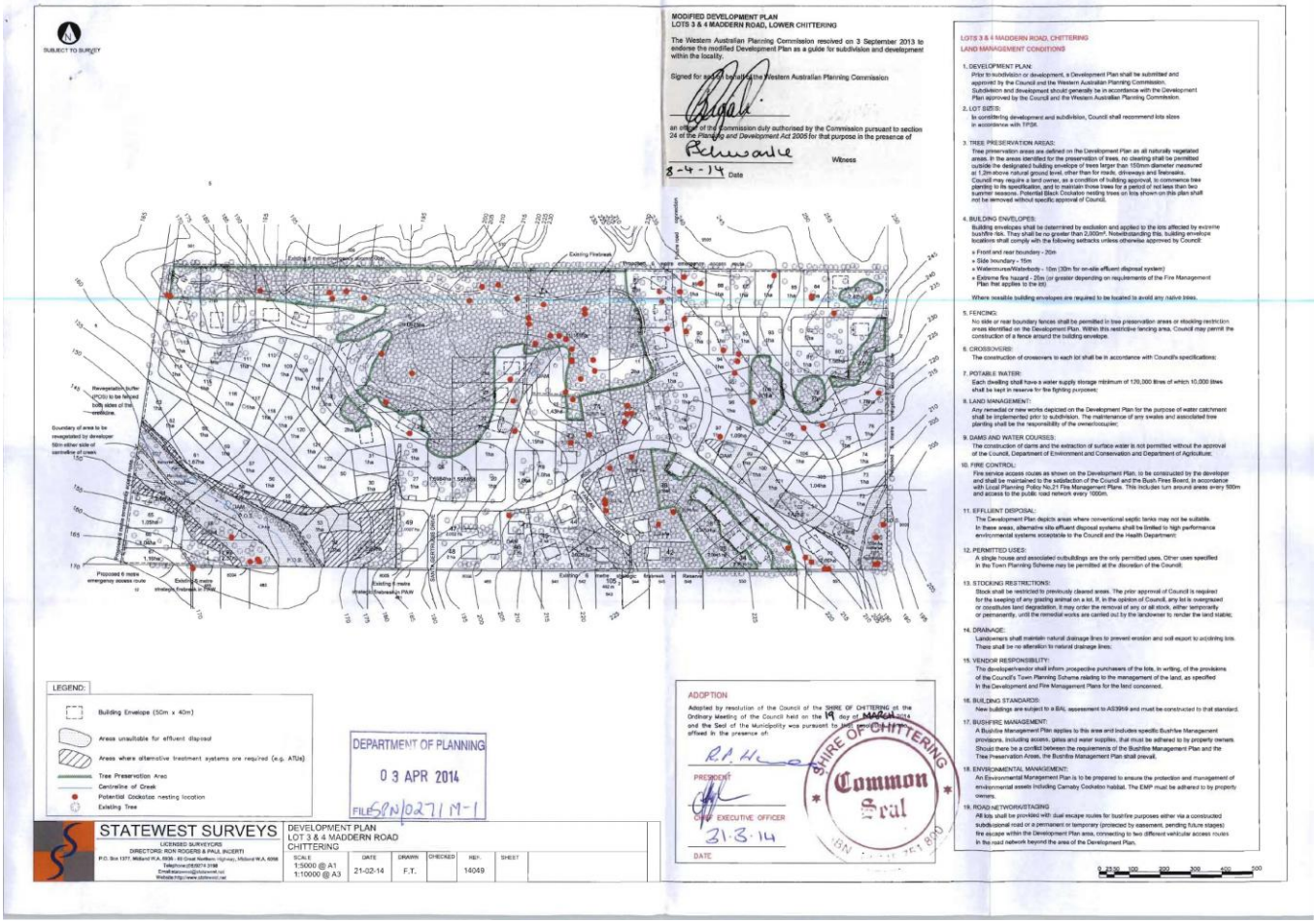


Figure S2-7 — Endorsed Development Plan identifying Tree Preservation Areas and potential Black Cockatoo nesting locations

The Development Plan defines all naturally vegetated areas as Tree Preservation Areas and identifies potential Black Cockatoo nesting locations. This plan provides the environmental-management context that is absent from the section 43A mapping.

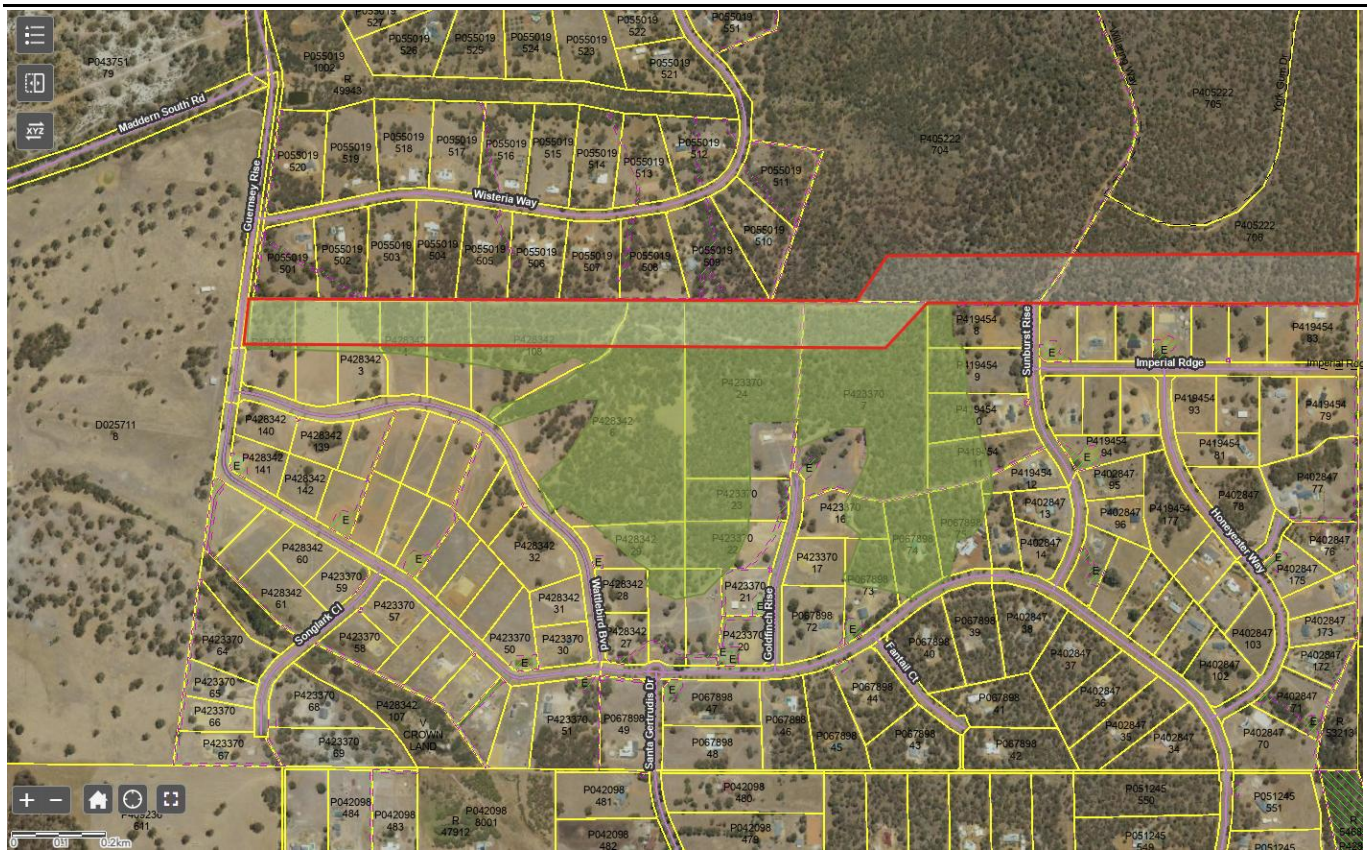


Figure S2-8 — Indicative relationship between the revised Infrastructure Development Envelope and Tree Preservation Area

Current cadastral aerial imagery showing a Shire-prepared indicative approximation of the revised Infrastructure Development Envelope (red outline) and the Tree Preservation Area (green shading). The overlay is illustrative and not to survey accuracy. It demonstrates the apparent intersection between the revised envelope and the Tree Preservation Area and the need for the proponent to provide an accurate spatial assessment of that interaction.

Source note: Figures S2-1 and S2-2 reproduce section 43A mapping. Figures S2-3 to S2-6 are current Shire mapping/aerial material supplied for comparison. Figure S2-7 is the endorsed Development Plan applying to the subdivision. Figure S2-8 is an indicative Shire-prepared overlay for illustrative purposes and is not to survey accuracy.