

Your ref:
Our ref: 1089

Chief Executive Officer
City of Greater Geraldton

Via email: council@cgg.wa.gov.au

Dear Sir

**REQUEST TO INITIATE AN AMENDMENT TO CITY OF GREATER GERALDTON LOCAL
PLANNING SCHEME NO.1 TO INTRODUCE AN ADDITIONAL USE – INDUSTRY FOR RURAL
ZONE (APPLIED TO LOTS 40 AND 41 GERALDTON TO MOUNT MAGNET ROAD TENINDEWA)**

Land Insights advises it acts under instruction and on behalf of Australian Vanadium Limited Pty Ltd who is contracted to lease or purchase described land from the landowners Wyalong.

Land Insights requests the City of Greater Geraldton to consider the attached submission and draft amendment documents and to initiate an amendment to the Local Planning Scheme No.1.

We request the City forms the opinion that this amendment is to be initiated and progressed as a Complex Scheme Amendment per Division 2 of the Planning and Development Regulations 2015 (as amended) due to it not meeting criteria as a basic or standard amendment.

We request, once it has been resolved to initiate, for the amendment to be referred to the Commission for review prior to advertisement for public submission.

Please find attached the prescribed requirements in support of the requested amendment: -

- 1 *Set of Scheme Amendment documents*
 - i. *Cover Page*
 - ii. *Form 2A*
 - iii. *Amendment Report*
 - iv. *Form 4A*
 - v. *Amendment Plans*
 - vi. *Form 5A*

These are reviewed and finalised following the receipt of further comprehensive written comment from the City Director of Development Services on March 2nd 2023.

This amendment is necessary to facilitate development of a vanadium processing plant in the east of the City. The project is subject to environmental and SDAU processes which involve public advertisement. We suggest the amendment could synchronise with these processes.

We offer to provide Elected Members and the City's Senior Management team with a further briefing about the project at the Council meeting. We can explain its current design and expected timeframes and to allow for any questions about the project, this amendment request, and related processes.

Please do not hesitate to call if there is any further assistance you require to advance our request to Council.

Yours sincerely,



Ross Montgomery
PRINCIPAL PLANNER
Land Insights
Planning – Design – Environment

10th March 2023



City of Greater Geraldton Local Planning Scheme No. 1

Amendment No. 18

Additional Use – Industry (A19)

Lot 40 & 41 Geraldton-Mount Magnet Road, Tenindewa

FORM 2A

Planning and Development Act 2005

RESOLUTION TO PREPARE AMENDMENT TO LOCAL PLANNING SCHEME

City of Greater Geraldton Local Planning Scheme No.1 – Amendment Number 18

Resolved that the Local Government pursuant to section 75 of the *Planning and Development Act 2005*, amend the above Local Planning Scheme by:

1. Inserting the following additional uses into Schedule 1

No.	DESCRIPTION OF LAND	ADDITIONAL USE	CONDITIONS
A19	Lots 40 and 41 Geraldton-Mount Magnet Road Tenindewa	Industry 'D' use	<ol style="list-style-type: none">'Industry' is restricted to the processing of vanadium includes ancillary and associated uses.Other conditions shall be as determined by the Local Government.

2. Amending the Scheme Maps accordingly.

The amendment is complex under the provisions of the *Planning and Development (Local Planning Schemes) Regulations 2015* for the following reasons:

1. This amendment is an amendment that is not consistent with a local planning strategy for the scheme that has been endorsed by the Commission.
2. This amendment is an amendment that is not addressed by any local planning strategy.

Dated this ____ day of _____ 2023

(Chief Executive Officer)

PLANNING REPORT

CITY OF GREATER GERALDTON – LOCAL PLANNING SCHEME NO. 1
Amendment No. 18 (A19) - Additional Use – Industry

Lot 40 & 41 Geraldton-Mount Magnet Road, Tenindewa

March 2023



1.0 INTRODUCTION

1.1. Proposal

This scheme amendment proposes to amend the City of Greater Geraldton Local Planning Scheme No.1 ('LPS1') by introducing 'Industry' as an Additional Use to Lots 40 and 41 Geraldton-Mount Magnet Road, Tenindewa ('the site').

The amendment is required as the site has been selected as the preferred location for the development of a vanadium processing plant. A preliminary assessment of the proposed development classifies it within the definition of "Industrial" land uses however this use cannot be considered (as an "X" use) within the site's 'Rural' zone.

An application for development approval has been lodged for the proposed processing plant and is currently before the State Development Assessment Unit (SDAU) within the WA Planning Commission (WAPC). The proposed modification to the City's Local Planning Scheme to include the additional "Industry" use at the site will allow the SDAU/WAPC to process and consider the application.

Australian Vanadium Limited (AVL) is the proponent of the vanadium processing plant. It is proposed that a vanadium rich concentrate is to be transported from the future Australian Vanadium minesite, which is located near Meekatharra. The processing plant in Tenindewa will receive the vanadium rich concentrate to produce a 99% pure vanadium product. The products of the plant will be exported for the manufacture of renewable energy batteries, aerospace parts and alloy steels used in construction. A valuable Iron-Titanium Co-product (FeTi) will also be produced and exported to overseas steel mills via the Geraldton Port.

The proposed 'Industry' additional use on the site is a required step needed to facilitate the development of the processing plant. The site has been demonstrated to be the most suitable and appropriate for the plant development, and this is explained further within this document. If approved and constructed, the plant will introduce a downstream processing capability of locally mined concentrate type materials (value-adding) to diversify and stimulate activity to the local economy.

1.2. Associated Assessments and Approvals Processes

Whilst the scheme amendment is for 'Industry' to be an additional discretionary use for this site, the site is also subject to a range of other assessment and approvals processes. These are outlined below.

Development Assessment

An application for approval to commence development has been lodged with the SDAU/WAPC for determination under Part 17 of the *Planning and Development Act 2005*. The Vanadium Processing Plant comprises the following (the proposal):

- Processing plant,
- Materials storage and laydown areas,
- Internal access roads, including two new site entrances,
- Evaporation ponds,
- Construction camp and activities; and
- Energy infrastructure.

Environmental Assessment

The processing plant was referred (April 2021) under s.38 of the *Environmental Protection Act 1986* (EP Act) to the Environmental Protection Authority (EPA). To support the referral, AVL prepared an environmental referral report (with supporting technical documents) addressing relevant EPA factors. The proposal was advertised for public comment from May to June 2022. No submissions were received and in July 2022 the EPA determined that there would be no formal assessment required under Part IV of the EP Act. They advised that all necessary construction and operating approvals can be managed via Department of Water and Environmental Regulation (DWER) Works Approval, Clearing Permits and Licensing processes.

Table 1.1 below lists summarises related approval assessments for the project which do not involve the Scheme amendment process, but which indicate the comprehensive layered assessment of the proposal.

Table 1.1 – Related Approvals

Assessment process	Comment
Formal referral under Part IV of Environmental Protection Act 1986	<p>The proposed vanadium plant development has been referred to the EPA pursuant to s38 of the Act. The EPA determined the proposal does not warrant formal assessment under Part IV of the EP Act.</p> <p>This process has now completed</p>
Works Approval under Part V of the Environmental Protection Act 1986	<p>Construction of processing facility, power plant and wastewater treatment plant.</p> <p>Management and storage of materials.</p> <p>This process is proceeding and will assess and set conditions to manage implementation and operation of the plant to meet environmental standards.</p>
Licence under Part V of the Environmental Protection Act 1986	<p>Operation of processing facility and wastewater treatment plant</p> <p>This process is proceeding and will assess and set conditions to manage implementation and operation of the plant to meet environmental standards. This includes a detailed understanding of sensitive receptors in the immediate vicinity including human habitation, the use of surrounding lands for agriculture and flora and fauna.</p>
Groundwater licence under the Rights in Water and Irrigation Act 1914	<p>Groundwater abstraction and use.</p> <p>An application will be or has been? referred to DWER for their assessment.</p>
Application for Development Approval via SDAU/WAPC	<p>SDAU will assess the design and layout of the plant and its interface with adjoining rural land and infrastructure. It will inform WAPC determination.</p> <p>The City of Greater Geraldton will be a referral agency as part of this process and will be required to assess and comment on the proposal.</p>

Further information about the plant, its operation, design, and environmental implications are addressed in technical reports referenced in the Appendix of this report.

1.3. Importance of the Plant

Vanadium is a mineral which is being discovered for many uses in science and technology, including batteries and aerospace applications. . Global demand for vanadium is strong and is forecast to grow.

This vanadium source is an extensive high-grade manganese-vanadium deposit in Meekatharra. The AVL vanadium minesite and associated processing plant was awarded Major Project status by the Federal Government in 2019, recognising the project's national strategic significance due to:

- Economic growth of the Australian vanadium market for steel and battery markets
- Social and economic benefit for the Mid-West region through direct and indirect jobs including opportunities for regional and national suppliers.
- Significant \$228M initial and ongoing financial investment for the Mid-West region (Vanadium being on the critical minerals list for Australia and the US

The Western Australian Government recognised the priority of this project by April 2020 with the WA Lead Agency Status to ensure it could be progressed. This priority support from Federal and State government indicates that assessments are to be progressed without undue delay.

The proposal aligns with Federal and Western Australian government strategies to increase development of the critical and battery minerals sector, and to include downstream processing within Australia.

Successful delivery of the proposal will provide regional employment opportunities during construction and operations and provide vanadium for use in strategic industries including the storage of energy from renewable power generation.

1.4. Site Location Considerations

This site is selected based upon commercial, operating, and environmental considerations and is the result of several years of study and planning by AVL (feasibility commenced in 2015).

Several site location options were considered, and these included:

- Co-location at the Meekatharra site,
- Location close to the Geraldton Port in an existing industrial area; and
- Location at a site mid-way between the mine and export facilities.

The initial base-case design considered a downstream processing plant collocated at the mine site in Meekatharra, as the project feasibility and design advanced, however, it was evident the location of a processing facility along the route to Geraldton would deliver greater plant operating and transport economies to AVL, benefits to the local community and would have overall lower environmental impacts over the operating life of the plant.

The benefits of separating the processing plant from the mine and to a identify suitable location include:

- Sufficient quality and quantity of water resources– a site with better access to suitable water than Meekatharra would reduce impacts on the environment.
- Availability to connect to an existing gas pipeline, thus eliminating the need for a new gas pipeline to be constructed to the mine site (including associated land disturbance and environmental impact of such a pipeline).
- Increased capability to source renewable energy sufficient for the mine site to operate and without the significant added energy required for the operation of the processing plant.
- Reduced plant construction cost and logistics requirements compared to the more remote mine site including decreased road transport for construction, reduced road safety risks and lower greenhouse gas emissions from construction transport over a longer distance.
- Relocating the plant construction and maintenance workforce closer to a major regional town, thereby leading to reduced fly-in fly-out workforce and increased regional residential employment opportunities.
- Proximity to the Dampier-Bunbury Natural Gas Pipeline or the Mid-West Pipeline enables cost-effective power generation for the plant using natural gas (and possibly hydrogen in the future).

- Efficient road access via a major road network linking the plant to the Geraldton Port.
- Reduced plant operating costs leading to increased economic sustainability of operations.
- Reduced transport costs associated with supplying the processing facility over lifetime.
- Relocation of iron-titanium (FeTi) Coproduct production point closer to the port, making it feasible to export the FeTi Coproduct rather than stockpiling it as a 'waste' at the mine site.
- With the depletion of the Meekatharra resource to provide opportunities in the longer future for the processing facility to receive alternative mineral concentrates from other vanadium mines within the region.

Under the preferred scenario of separating the mine and plant, the project relies upon the effective relationship between the activities of the mining and crushing activities located at the minesite near Meekatharra (extraction and milling), and the concentration plant in Tenindewa. The plant site needs to be ready to develop with available power, water, and transport infrastructure (or readily enhanced capability of these).

The site selection investigated options to maximise scale economies of production; to operate sustainably to limit environmental and transport impacts; and minimise plant inputs (energy and water) and to achieve best use of resources for production. The weight and bulk reduction or raw to processed product is also a consideration.

In considering access to suitable land, services, and transport, coupled with costing factors, it has been determined that a location between the mining operation and the Geraldton Port is optimal for the processing facility because operating costs over time are an important commercial factor.

Energy is a large cost consideration in processing minerals in an environmentally responsible manner. AVL is investigating sustainable energy options for the plant, and the Tenindewa locality currently offers proximity the Dampier-Bunbury and Mid- West gas pipelines. These pipelines are strategically important for present access to LNG for the immediate needs of the project.

1.5. Site Option Identification and Selection

AVL identified several preliminary sites of interest undertook a detailed Multi Criteria Analysis (MCA) to compare and analyse each to determine the most suitable location for the plant. options for the plant location, taking into account the general operational requirements, availability of land, access and zoning. In total AVL shortlisted seven separate locations and subject these to detailed assessment using a comprehensive list of criteria. Two sites within the existing Narngulu Industrial Area were considered, along with possible co-location at other industrial and infrastructure sites within the Mid-West. The other sites were in rural areas east of Geraldton – including the preferred location at Tenindewa on the corner of Erangy Springs Road and the southern side of Geraldton to Mount Magnet Road.

In summary the multi-criteria site analysis compared sites based on a range of issues, such as:

- access to suitable land (suitable size, option to purchase, favourable geotechnical analysis, suitable slopes).
- utility services availability (power, water, and gas, with suitable and nearby connections available).
- environmental suitability – land that has limited conservation values.
- community considerations – proximity to townsites, employment opportunities, local economic benefits.
- transport and logistics – road access; potential future rail access.

The MCA found that there are no suitable sites for the plant already zoned and appropriately serviced for the proposed processing plant within the Greater Geraldton area. The outcomes of the MCA are confidential due to the sensitive business intellectual property associated with the design, building and operation of the plant, however an explanation of the MCA is summarised in a table at Appendix A, with overview of the matters considered in the process.

It should be noted that both the Narngulu and Oakajee Industrial areas were evaluated by the MCA and found to be unsuitable especially when compared to Tenindewa. This resulted in these two sites being ruled out as

unsuitable or not commercially effective for the development and operation of a plant in the required timeframe. Of the Narngulu Industrial Area site, the key named constraints included:

- significantly higher land values, with limited land parcel sizes available,
- the inability to secure sufficient land area across multiple ownerships,
- more complex environmental approvals process due to sensitive surrounding land uses, smaller surrounding lots sizes, and more expensive site works due to challenging site features,
- potential visual impacts associated with stack – it would be visible looking eastwards from the Geraldton urban areas,
- potential infrastructure constraints/capacity issues; and
- limited land parcel sizes restrict options for a possible stand-alone renewable energy facility.

The Oakajee Industrial Area is not implemented nor is there a capital commitment from the WA Government for this major and complex project to be advanced. It therefore cannot be considered as a serious option given the commercial timeframes for AVL to build, operate and export product to global markets by 2025.

1.6. Suitability of the Tenindewa Site

The Tenindewa site is suitable and optimal for the development and operation of the plant because of the following infrastructure availability: -

- land abuts two public roads – the Geraldton - Mount Magnet Road to the north (which is a constructed freight capable route) and on the western edge the Erangy Springs Road (an unsealed rural standard road). The Geraldton-Mount Magnet Road is already recognised, constructed, and operating as a key freight route for the region.
- Land abuts a freight rail corridor along the northern boundary of Lot 40 and connects Geraldton to Mullewa.
- Land is a short distance from a gas pipeline from Dampier to Bunbury to the west of the site. This pipeline will be used to supply gas to the plant for power generation purposes. An additional gas pipeline runs north of the site, heading eastwards to Mount Magnet.

The site is elevated and consists of free draining sandy soils. Water for the plant will be sourced on-site from deep aquifer. An exploratory borehole indicates that water is available to the site with negotiations progressing with DWER to obtain a water extraction licence for the proposed plant. The potential for impacts to the hydrology associated with nearby conservation areas will be managed to protect environmental water quality and quantity as part of the DWER assessment and approval process.

The Tenindewa site is not close to other land uses other than rural (extensive cropping) and nature reserves, and therefore construction works would not impact other landowners or businesses.

The site also has access to adequate base utility services (at and in proximity) which can be augmented on site to supply the plant for all its operational activities.

2.0 SITE CONTEXT AND CONSIDERATIONS

2.1. Location

The proposal is located on Lots 40 and 41 Geraldton-Mount Magnet Road, Tenindewa. The site is approximately 65km east of Geraldton and approximately 35km south-west of Mullewa and comprises an area of around 1 870 hectares.

The site is well connected to freight transport routes and is located on the southern side of the Geraldton-Mount Magnet Road at the south-eastern corner of its intersection with Erangy Springs Road. The Northern Freight Railway between Geraldton and Mullewa (part of the existing line extending east to Mount Magnet) runs east-west along the northern border of the property.

2.2. Site Area

The land to be rezoned is 1,870.2 hectares in area. The plant itself is expected to occupy 40% of these lots (up to 760ha), the amendment applies to the whole of Lots 40 and 41 to reflect cadastral property boundaries. Given that 60% of the site around the margin is not occupied by the plant, the amendment area adequately allows for uses and their impacts can be contained within the landholding.

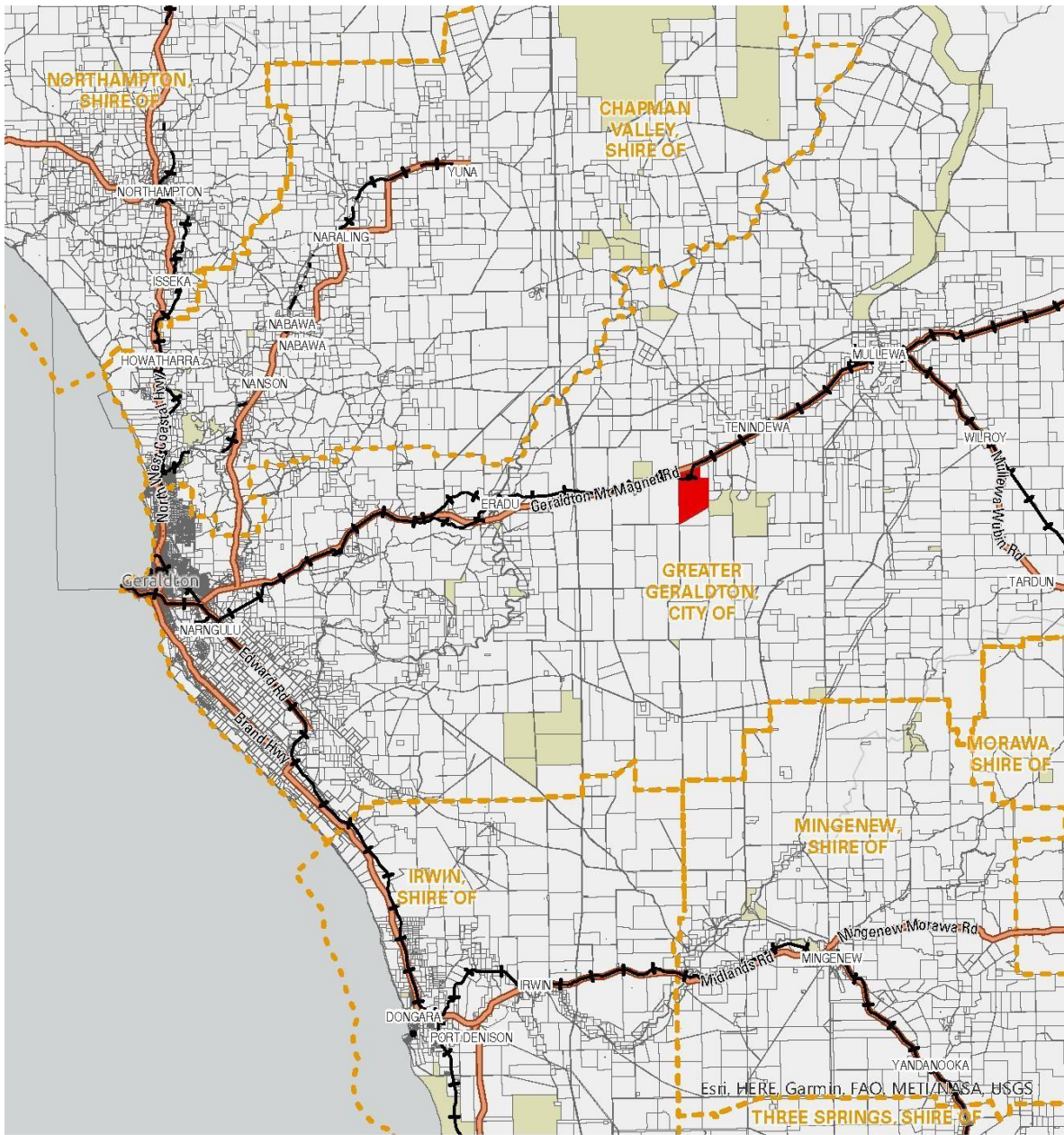
2.3. Ownership

The property is owned by Wyalong Pastoral Co. Pty Ltd. and AVL holds the purchasing rights in agreement with the landowner to allow for the development of the plant at this site, provided approvals are possible. Tenure details are included in Table 2.1 below. A certificate of Title is Attached at Appendix B.

Table 2.1 - Title Details

Lot Number	Volume	Folio	Plan/Diagram	Registered Proprietor
40 & 41	2216	19	DP28736	Wyalong Pastoral Co Pty Ltd

A site context plan, site plan and aerial plan are provided on the following figures 1.1, 1.2 and 1.3



- Cadastre
- State Road
- LGA Boundary
- Rail Line
- Site Location
- DBCA - Legislated Lands and Waters

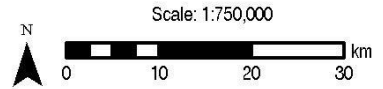
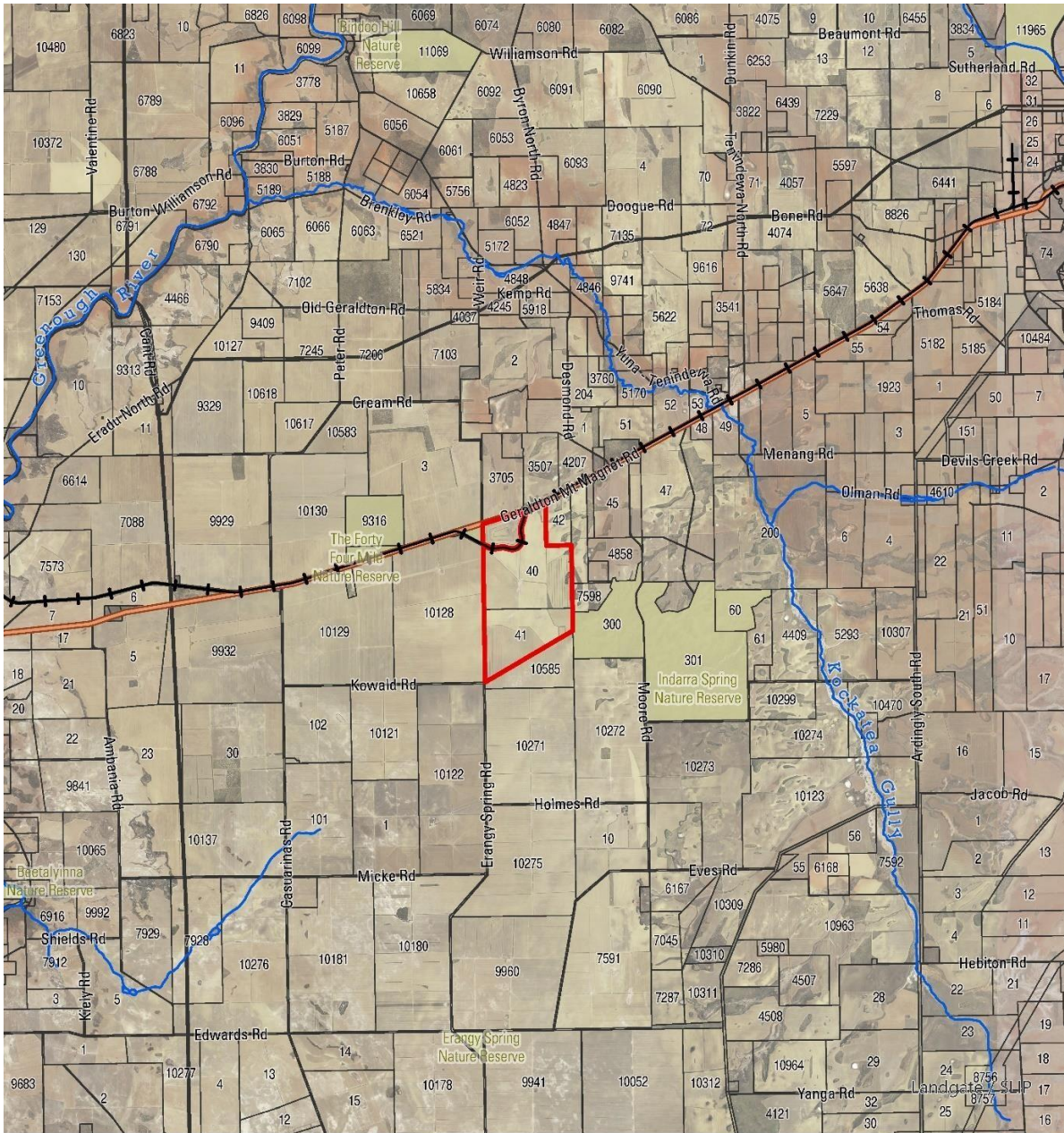


Figure 1.1 - Site Location



-  Cadastre
-  Site Location
-  State Road
-  Rail Line
-  DBCA - Legislated Lands and Waters

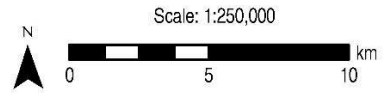
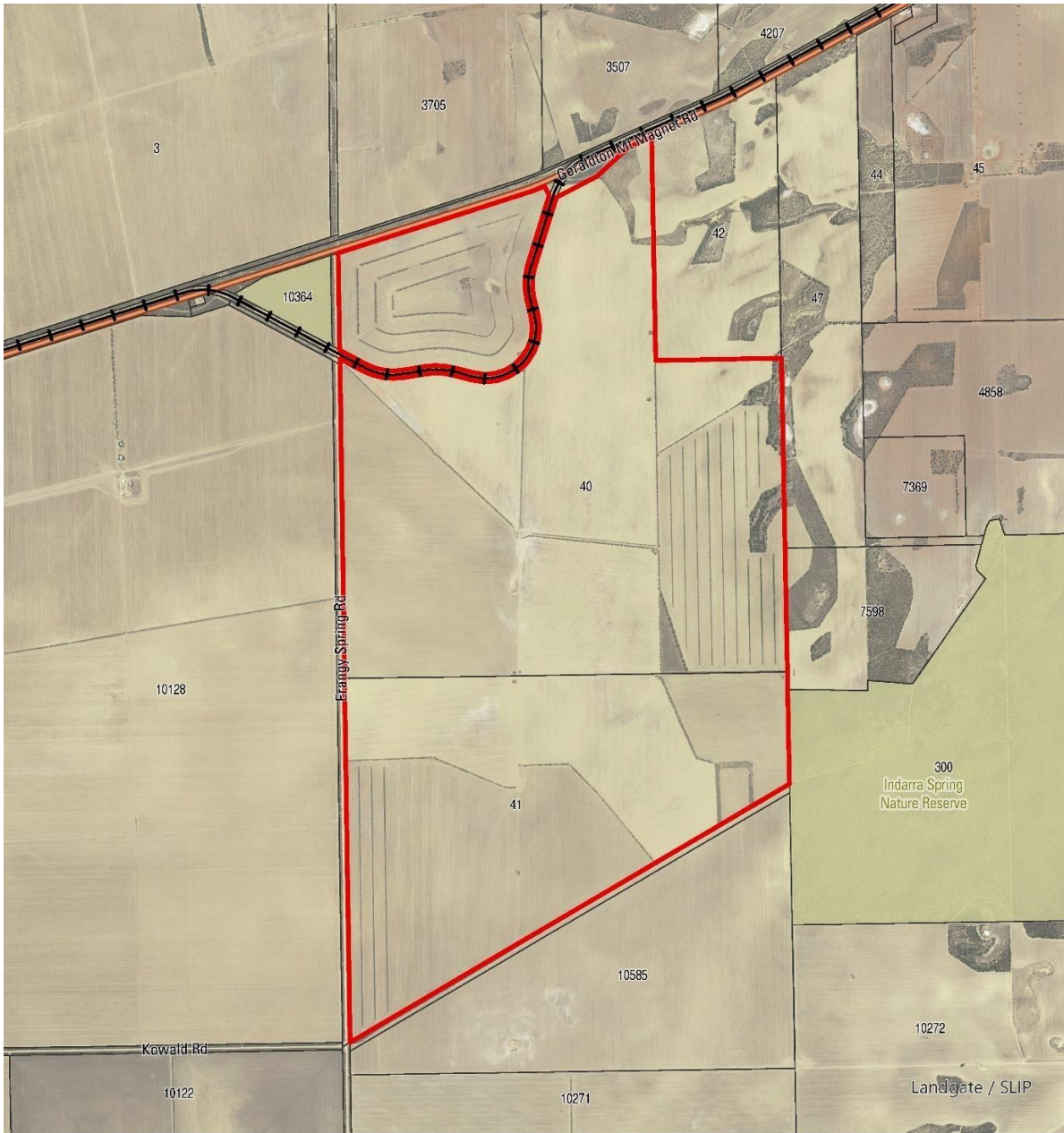


Figure 1.2 - Site Context



- Cadastre
- Site Location
- State Road
- Rail Line
- DBCA - Legislated Lands and Waters

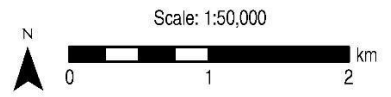


Figure 1.3 - Site Aerial

2.4. Current & Surrounding Land uses

Tenindewa is a farming locality with farm settlement and extensive cropping activity. Rural land holdings are substantially cleared for extensive agriculture use (namely cropping) with sparse remnant native shrubs and trees in road reserves and several planted tree windbreaks between fields.

Lots 40 & 41 are predominantly cleared of native vegetation and only partially planted to cereal crops. A private air strip and apron has been cleared and is used for crop management purposes is located across the two lots. There is a large shed and surrounding cleared area of fallow ground. The two properties are surrounded by large rural land holdings which are zoned "Rural" within LPS 1.

The Geraldton to Mount Magnet Road is located to the north of the site and is designated primary distributor road reserve within LPS 1 with freight capability. A railway reserve is adjacent to the northern boundary of the site and has recently been upgraded to improve its freight handling capability. This freight railway line connects the Geraldton Port to Mullewa.

There are two adjacent Crown Reserves for the purposes of nature conservation. Reserve 24185 is located to the west of the site being 29.89ha vested for the purposes of conserving flora and fauna. Abutting the site to the south-east is Reserve 41885 known as the Indarra Spring Nature Reserve a 2868.34ha Class "A" Reserve vested for the conservation of flora and fauna.

Surrounding the site are broad-acre crop farms, and there are no houses close to the site.

2.5. Existing Site Characteristics

The landform is undulating and rises south towards an east-west ridge before sloping down to the south. There is an airstrip located on Lot 40. Although much of the property has been cleared for cropping and the air there are small areas of remnant vegetation (at the edges of the site).

2.6. Infrastructure requirements

Power

There is no suitable distributed power service for the site. It is therefore proposed to construct a stand-alone power plant to service the plant site. The proposed power generation plant will be a hybrid of gas and renewable (solar) power plant, with installed power capacity of 11.5MW. Provision is being made for the future installation of Vanadium Redox Flow Batteries for storage of generated power; however, this is not proposed in the initial stage of the project (albeit the proposed scheme amendment will likely allow for this work to proceed as an 'incidental' component of the vanadium processing plant).

The size, nature and output design of the power plant is being refined by AVL. Details of the power plant emissions and controls will be provided to DWER as part of the Works Approval application, this information is required for their assessment and prior to commencing construction and is not relevant for the purposes of the proposed scheme amendment.

Water

The plant will require secure supply of water for processing and site management purposes by abstracting groundwater from the deep aquifer subject to DWER licencing. AVL will use water from a deep aquifer (over 200m below ground level) to avoid impact on the superficial aquifer used elsewhere in the locality by rural and environmental water needs. Although DWER is still assessing the project initial hydrology studies conclude the abstraction will not impact surface or superficial (or shallow) aquifers.

The project will therefore not impact surface and superficial aquifers.

DWER is responsible for assessing the demands for the water abstraction and this will be undertaken separate from the Local Planning Scheme amendment process as part of the SDAU and DWER Works Approvals processes.

Access

Pre-processed materials will be trucked to the site from the Meekatharra minesite. Processed concentrate will be trucked from the plant to Geraldton Port. Some trips to and from the site are for employees, contract and services (incidental supplies for example).

There will be two access points to the site – one for haulage Heavy Vehicles (HHVs) and one for services Heavy Vehicles (SHV = maximum Double Road Train) and Light Vehicles (LVs). Two access points are

proposed for the following reasons:

- HHVs deliver product to two distinct locations at the processing plant.
- Separation of LVs and 60 m haulage HVs for safety.

A Traffic Impact Statement (TIS) has been prepared for the project which found that access arrangements are generally suitable for the development proposed. The TIS accompanies the SDAU application. Preliminary consultation occurred with Main Roads WA (MRWA) when the TIS was prepared. MRWA does not provide written advice or comment unless a proposal is referred to it after it has been formally adopted. This is usual MRWA practice throughout WA and therefore amendment once initiated will be formally referred for MRWA formal technical assessment comment.

In the scoping and preparation of the project as part of the SDAU application, a 'Development Assessment Forum' on the proposed SDAU application was held at the beginning of 2022. During the forum, MRWA did not raise specific or in-principle objections to the proposal, however it was noted that further discussions with service providers will continue to occur as both the scheme amendment and the SDAU application progress to be formally referred for comment.

3.0 PLANNING AND ECONOMIC FRAMEWORK

3.1. State & Regional Planning Framework

State Planning Strategy

The State Planning Strategy (SPS) identifies the importance of coordinated land planning with decisions about economic development and regional investment in infrastructure.

Section 1.1 of the SPS refers to ‘*the resources economy,*’ and establishes the following objective:

To maintain and grow Western Australia as the destination of choice for responsible exploration and development of resources.

The SPS recognises that:

- Investment in the resources sector benefits the State and Australia. As the sector expands, direct and indirect labour demand increases.
- Western Australia is already home to many multi-national resource companies and a leading centre for resource exploration, production innovation, research, and development.
- The State benefits directly from royalty revenues, which have increased from a 5% share to more than a 20% share of State revenue over the past decade.
- In addition, large numbers of asset transactions provided the State with significant stamp duty revenues. This revenue enables the Government to provide more community services and essential infrastructure to support the growth of the State.
- Much of the State’s economic activity occurs in remote regional areas and provides these areas with opportunities for development.
- Despite challenges such as access to labour and services, infrastructure availability and high transport costs, the benefits that flow from the resources sector facilitate significant community and economic development throughout the State.¹

Of relevance to the AVL project, the SPS outlines the following as the strategic approach for planning the State’s resource economy:

Project facilitation	Effective, transparent, timely and efficient administrative and regulatory systems	<ul style="list-style-type: none"> • Project approval timeliness • Amount of resource investment 	<ul style="list-style-type: none"> • Informed and timely project approvals in which the costs and time of doing business in the State continue to be minimised • The State progressively reviews approvals systems to enhance their transparency and efficiency • Ongoing collaboration with the Australian Government to streamline project approval processes
Strategic industrial lands	Project-ready industrial land to meet the demands of the resources sector	<ul style="list-style-type: none"> • Number of established project ready industrial sites • Level of investment in mining and petroleum processing 	<ul style="list-style-type: none"> • Appropriate strategic industrial land and infrastructure to support priority sectors is available throughout the State • Strategic Industrial Lands developed to acceptable environmental standards to ensure ongoing investment and sustainable economic growth
Downstream processing	Strong downstream processing industries, particularly in the low volume, high value, high technology Critical Minerals sector	<ul style="list-style-type: none"> • Total investment in profitable downstream processing of resources and value of processed products 	<ul style="list-style-type: none"> • Western Australia is a world-leader in production and downstream processing of Critical Minerals (e.g. titanium metal, rare earth metals, lithium, tantalum) • Continued investment to add value to resource products • Industrial ecology is maximised in the planning and operation of all strategic industrial areas

The SPS proposes the identification of strategic industrial areas in advance of demand to ensure there is adequate supply of serviced industrial land. One of the key State Challenges (SPS, p42) is in the identification and provision of these industrial lands for their benefit to the State economy. In this regard, the SPS states:

Export-oriented heavy industries often require land in strategic industrial areas. These areas generally have multiple proponents and require efficient access to key transport infrastructure. Land suitable for strategic industrial areas is limited and cannot be easily replicated or replaced.

¹ Source: SPS, p39

Strategic industrial areas are of significant economic and strategic importance for the State and require suitable and appropriate integration with surrounding compatible land uses and buffer areas to ensure long- term sustainability.

Within the Mid-West region, Oakajee is identified as a SIA however to date there has been no capital commitment, and therefore no further progress on feasibility or implementing this beyond being a strategic idea. As discussed earlier, the site assessment MCA assessed and concluded that Narngulu was not a suitable location for the reasons listed (refer 1.4.2).

The State Planning Strategy 2050 (SPS) provides a “credible State strategic context and basis for the integration and coordination of land-use planning and development across state, regional and local jurisdictions”.

It achieves this by identifying five key issues of strategic importance to the ongoing growth of Western Australia, namely:

- Economic Development
- Physical Infrastructure
- Social Infrastructure
- Environment
- Security.

Within this context, the Strategy in Resources Economy is seen as critically important, with the SPS objective in this regard being:

To maintain and grow Western Australia as the destination of choice for responsible exploration and development of resources.

The SPS identifies several approaches to realise the objective. Those of relevance to this current application are addressed in Table 3.1 below.

Table 3.1 - State Planning Strategy - Approach to the resource economy

SRS Approach	Relevance to project
<p>Project Facilitation</p> <p>Effective, transparent, timely and efficient administrative and regulatory systems</p>	<p>The project has received WA Lead Agency Status with DMIRS assisting in the facilitation of all major assessment to approval pathways.</p> <p>This current SDAU application will assist with the facilitation of the project through the detailed assessment of layout, design, and construction.</p>
<p>Strategic industrial lands</p> <p>Project-ready industrial land to meet the demands of the resources sector</p>	<p>The City of Greater Geraldton Local Planning Strategy has identified a need for additional industrial land in addition to the current Narngulu Industrial Area. This is yet to be implemented.</p> <p>The Oakajee Industrial Area likewise is an aspiration which has not yet progressed via feasibility or formal capital commitment.</p> <p>This project is for a processing plant, proposed for Tenindewa. Once this project advances it may provide a catalyst for further investigation of Tenindewa as a suitable location for future industrial development. The site is well serviced and is sufficiently close to Geraldton to be serviced by City based suppliers. Whilst it is beyond the remit of AVL, the City may consider taking an investigation further on its own or with WA Government guidance.</p>
<p>Downstream processing</p> <p>Strong downstream processing industries, particularly in the low volume, high value, high technology Critical Minerals sector</p>	<p>The project proposes downstream processing to produce a high purity Vanadium (99% V2O5) product, a high-value critical mineral product for export which can also be used to boost VRFB production in Australia.</p> <p>The plant also proposes minerals to be recovered as economically useful by-product</p>

SRS Approach	Relevance to project
<p>Exploration and resource development New discoveries of world-class resources continue to be made and developed in Western Australia</p>	<p>The Australian Vanadium Project is one of the most advanced vanadium projects currently being developed in the world because it has fundamental security of resource and capability to process it to high quality standards.</p>

Mid-West Regional Planning & Infrastructure Framework; Guilderton to Kalbarri Sub-regional Strategy

The Mid-West Planning & Infrastructure Framework 2015 (the Framework) identifies a range of regional infrastructure projects and are considered significant to facilitate further economic growth. It is focussed on regional infrastructure and may be superseded in most respects by the recent State Infrastructure Strategy 2022, which identifies a shift in government focus as part of the planning and delivery of infrastructure across the State.

The key relevant feature of the Framework nevertheless intends for there to be a major new port developed at Oakajee and for this to be connected to the hinterland by new regional road and railway links. It also indicates the creation of a Strategic Industrial Area – presumably to accommodate major industrial development such as manufacturing, processing, and similar plants, however it does not elaborate these expected uses in detail or consider their suitability for all industry. The State Infrastructure released in 2023 does not advance or formalise a commitment to the Oakajee Port as a priority or funded project. The Oakajee Port itself would not be achieved without expensive and necessary new major road and rail connections. None of these have been funded and there is no commitment in 2023 and as a result that site is not available or suitable in the short to medium term.

The processing plant proposed by AVL is consistent with the objectives and guidance of both State and local planning strategy by virtue of the following:

- the introduction of a significant minerals downstream processing facility within the region,
- diversification of the regional economy by introducing a new industry,
- consolidating the importance of the Geraldton Port for minerals export; and
- providing significant employment opportunities within the Greater Geraldton region, both during construction and operational phases.

Western Australia’s Mineral and Petroleum Resources Development Strategy

This strategy was released in September 2021 and recognises that the resources sector dominates the State’s export earnings and “provides substantial direct and indirect employment, supports downstream and service industries, and delivers essential revenue to both the State and Commonwealth governments”. The strategy identifies 6 Strategic Priorities, including Strategic Priority 3: *An industry that is efficiently and effectively regulated.*

In meeting this strategic priority, a key Government action is “Amendment of Planning Legislation to cut red tape for significant development proposals”. This action specifically references the temporary Development Application pathway of the State Development Assessment Unit, and its role in being able to consider and support minerals-based projects of State or Regional Significance; a pathway which has recently been affirmed (2023) by the WA Government.

This project is clearly of significance to WA, recognised by the Major Project Status and Lead Agency Status, and it therefore should be supported within the local planning and SDAU approvals pathway, which includes support from the Local Government regarding facilitating its development via this proposed scheme amendment for the suitable site.

State Planning Policy 2.5 – Rural Planning

The intent of SPP2.5 is to “protect and preserve Western Australia’s rural land assets due to the importance of their economic, natural resource, food production, environmental and landscape values” and applies across Western Australia. This policy was prepared in 2014 to reflect the Department of Agriculture WA soil science findings because of a pilot study which was based on the Southwest of WA and the Mid West Region.

The background to this work was the premise of a protecting agricultural land in the Mid-West Region as a

contingency for the continuing loss of agriculturally productive land within the metropolitan and south-west regions of the state (due mostly to peri-urban residential expansion). The policy reversed what had been perceived to be a presumption of planning that Rural land was available for other uses without many consequences.

An additional consideration was the possible scenario of impacts on food production due to drying climate and declining soil fertility. It is a State policy which applies to the entire state as well as the Geraldton Region.

The objectives of SPP 2.5 are to:

- a. support existing, expanded, and future primary production through the protection of rural land, particularly priority agricultural land and land required for animal premises and/or the production of food;
- b. provide investment security for existing, expanded, and future primary production and promote economic growth and regional development on rural land for rural land uses;
- c. outside of the Perth and Peel planning regions, secure significant basic raw material resources and provide for their extraction;
- d. provide a planning framework that comprehensively considers rural land and land uses, and facilitates consistent and timely decision-making;
- e. avoid and minimise land use conflicts;
- f. promote sustainable settlement in, and adjacent to existing urban areas; and(g) protect and sustainably manage environmental, landscape and water resource assets

SPP 2.5 recognises the importance of identifying and protecting the loss of high value agricultural land in WA.

In 2013 the Department of Agriculture and Food WA completed the Identification of high-quality agricultural land in the *Mid West region: Stage 1 – Geraldton Planning Region*. High quality agricultural land is defined as areas of land identified from a combination of soil, land capability, water resources and rainfall data as the most productive and versatile for either irrigated or broadacre agriculture. This does not account for climate variability. The study characterised the East Eradu Sandplain ALA as part of the 'Group C: Moderate Versatility' area as it provided high crop yields with some area potential for horticulture with the Mullewa ALA being within the 'Group E: Lower Versatility' given the potential to insignificant water resources, variable rainfall and moderate to low yields.

The City referenced this study when it included the western portion of the site within the high versatility agricultural land classification in the *Local Planning Strategy* (2015). No further studies to ascertain soil productivity or climate variability have been undertaken to date.

Lots 40 and 41 are on the boundary of two agricultural land areas being the East Eradu Sandplain ALA and the Mullewa ALA, however in terms of the proposal which is the basis of this local scheme amendment request, it is noted that Lots 40 and 41 are in an area of transitional agricultural quality for broadacre cropping. with DPRD land capability mapping for broadacre cropping indicating that the site sits across categories B1 and B2. Whilst these are not of the highest agricultural quality, they are of moderate to high quality but this like most of the area around Tenindewa and the broader agricultural area. In terms of managing impact AVL acknowledges the plant once constructed will remove an area of this site from farming production. The plant footprint is however to be confined to just a portion of these two lots to minimise the extent of impact on surrounding cropping land. The balance of the site (including the entirety of Lot 41) may be managed as cropping should there be justification and interest to continue this use. Air quality monitoring for the processing plan indicates there is no likely impact on the productivity rural cropping.

To add perspective, SPP 2.5 recognises that in a large and diverse state such as WA with regional variations of climate and economic activity, rural zones may need to accommodate for a wide range of land uses than farming production. Decisions are to be guided by the need to provide economic opportunities for rural communities while protecting the State's primary production and natural resource assets. The policy therefore advocates for regional variations where they meet the stated objectives of the policy.

Relevant Application of SPP 2.5

SPP 2.5 contemplates that not all rural uses are associated with food production and therefore also states that due to their size, scale and potential level of impact, some rural land uses could be considered

industrial, some rural land uses are located on industrial land, and some industrial land uses are located on rural land. This is more broadly construed to apply to rural associated industries – however the amendment to the scheme is for an industry as an additional use and the Policy states that planning decision-makers need to consider the application of the Policy in the context relevant to each proposal.

Lots 40 and 41 are presently partially used for cropping but are also used for an airfield and large cleared taxi way and large grain/fertiliser storage shed. It is acknowledged that the development of the vanadium processing plant will result in some further loss of land currently being cropped, however the current use of the land has not been exclusively food crop production. The SPP does contemplate whether allied but nevertheless non-productive uses such as the existing airfield or grain-silage and fertiliser storage would be appropriate in rural areas

Table 3.2 below summarises the relevance of SPP 2.5 criteria in the context of the site and surroundings of Lots 40 and 41 to illustrate its benign affect to the context of the policy.

Table 3.2 – Clause 5.11 -SPP 2.5 requirements

SPP requirement	Response
Rural industries may be suitably located on rural land where: a) they are located on State roads, or roads of a suitable standard or treatment to accommodate the traffic volume and freight task of the land use	Satisfied. The site directly abuts such a major regional road and a railway freight route.
b) Impacts of the land use are contained within the lot boundaries, or satisfactorily avoided, mitigated or managed, such that noise, amenity, and air and water quality do not detrimentally affect nearby sensitive land uses	Satisfied. Scientific air-quality modelling of the plant design and site layout confirms the proposed industrial use will not generate air quality impacts over the site and certainly not beyond the boundaries of either Lot 40 or 41 – the amendment area. (refer to following sections for detail.)
c) they are not visually dominant within key viewsheds, and are visually compatible with surrounding land uses and development	Satisfied. The plant will not be visible from the Geraldton – Mount Magnet Road or from other visual receptors such as houses. The plant vent stacks may be visible at a distance from the road but will not be visually dominant.
d) they are provided with essential services commensurate with the intended land use.	Satisfied. The proposal can be serviced by on-site and environmental sourced services with network utilities as a back-up.
e) biosecurity issues that may require the facility to achieve a separation distance that may not be possible in an industrial estate,	Satisfied. There are no likely bio-security issues as a result of the operation of the vanadium processing plant at the site.
f) the availability of industrial land in the locality	Neutral. There is currently no available or suitable industrial zoned land within the Greater Geraldton Region.
g) the strategic direction for rural land and land uses in an applicable local planning strategy	Neutral. The City's local planning strategy 2015 identifies that additional industrial area to the east is necessary. It delineates a proposed area in DIA 9 The amendment will achieve many of the 2015 Strategy objectives for industrial activity and employment in the east of the City.

SPP 2.5 emphasises understanding and avoiding land use conflicts in each stage of the planning framework. Decision-makers need to consider the suitability of land uses in both a broader context and the ability to manage activities within the site prior to determining whether the use of a buffer is necessary.

Clause 5.12.1 states

- i. "where a development is proposed for a land use that may generate off-site impacts, there should be application of the separation distances used in environmental policy and health guidance, prescribed standards, accepted industry standards and/or Codes of Practice,

followed by considering –

- (i) whether the site is capable of accommodating the land use; and/or
- (ii) whether surrounding rural land is suitable, and can be used to meet the separation distances between the nearest sensitive land use and/or zone, and would not limit future rural land uses; and
- (iii) whether if clauses (i) and/or (ii) are met, a statutory buffer is not required.”

Clause 5.5 of the policy seeks to promote economic development opportunities, with the WAPC to balance the need for economic opportunity with the protection of the State’s primary production and natural resource assets. Regarding this proposal, the economic opportunity of the project is significant.

The western portion of Lots 40 & 41 is classified within the City’s Local Planning Strategy as “Higher Versatility Agricultural Land” along with other rural land to the west and south. The Strategy is based upon the HQAL pilot study by the then Department of Agriculture focussed on Geraldton and aimed to demonstrate how better information about agricultural land productivity can inform planning decisions. The study is careful to point out the information is just a part of an overall set of considerations for land in rural areas and has been completed to provide an overarching appreciation for rural land and its importance for food production. The focus is to protect productive rural land in peri urban areas and close to markets from being sterilised by development for non-rural use.

Although this site is not peri-urban it is nevertheless currently farmed for wheat and is therefore productive. SPP 2.5 is relevant as part of the overall consideration of the site, and the broader context of the size of the site as a proportion of the larger surrounding agricultural area.

The two lots are rated to have a High Versatility for agriculture in the Local Planning Strategy which references the HQAL methodology. This is based upon soil type, irrigation, rainfall, and land capability. This land is not irrigated, and the soils are free draining but unimproved used for extensive cropping. The eastern portion of the site along with other rural land to the north and east is simply classified as ‘other rural land’. The land is categorised by the Department of Agriculture pilot ALA study as B1 and B2 of ‘high versatility’.

Clause 6.4 outlines relevant matters for a planning authority contemplating zoning proposals or amendments to local planning schemes. The proposal is assessed as follows:

Table 3.3 – SPP2.5 – clause 6.4 requirements

SPP requirement	Response
Suitability of site to be developed for the proposed use	The amendment is for an Additional Use – Industry in the Rural zone. The land has been identified as generally suitable for the development of a processing plant (in this case it is for vanadium). DWER and SDAU assessment processes will address site layout, and environmental management and performance of the plant to manage impacts within agreed acceptable standards. Amendment may be initiated – the conclusion of the amendment will be informed by other studies in progress.
The siting of the zone/land use in the context of surrounding zones/land uses.	The Amendment proposal is for an additional use – there is no proposed change of zone from Rural.
The capacity of the site to accommodate the proposed zoned/ land use and associated impacts, and;	Lots 40 and 41 can accommodate the proposed plant and associated infrastructure well within its boundaries. There will be sufficient land around the margins to manage screening or other issues. No off site impacts evident from modelling.
- Only support proposal consistent with endorsed planning strategies or in exceptional circumstances where the proposal meets the objectives of the WAPC policy	The proposed amendment is being considered as a complex amendment to facilitate an application made under s17 of the <i>Planning and Development Act 2005</i> .

SPP requirement	Response
- That the continuation of existing rural land uses are taken into account	Rural zone will continue for the site which does not preclude continued cropping of land not occupied by the processing plant.

SPP 4.1 Industrial Interface

This policy of the WAPC prepared to supplement EPA Guidance on air quality and buffers. It was in draft form for several years and finalised in June 2022. The EPA Guidance is considered the reference for technical purposes whereas SPP 4.1 provides the overarching planning policy and context for that guidance to be applied.

SPP 4.1 applies to industrial land and land uses in Western Australia, in a range of cases, namely:

- a) land zoned for industrial purposes in a region or local planning scheme.
- b) industrial land uses on land zoned for industrial purposes.
- c) industrial land uses on land that is not zoned for industrial purposes.
- d) land that may be impacted by industrial land uses and strategic infrastructure.

Dot points c) and d) are relevant to the proposed additional industry use within the Rural zone for proposed on Lots 40 and 41.

The objectives of SPP 4.1, are to:

- a) Ensure the impacts of industrial land uses are considered at all stages of the planning process.
- b) Adequately separate industrial land uses and any resulting off-site impacts and/or safety risks from incompatible land uses to:
 - Protect industrial areas to improve long-term operational certainty.
 - Avoid, mitigate, or manage potential impacts on the health and amenity of people and the environment.
 - Promote co-location of like uses to minimise the impact area.
- c) Plan the land use transition between industrial land uses/infrastructure facilities and sensitive land uses by providing compatible zones, reserves and land uses.

This proposal is not for an industrial precinct or zone but rather the additional use of Industry within a Rural zone.

Consideration of the EPA's separation distance requirements is cited by SPP 2.5. There are currently two separate documents, the currently approved document published in 2005 and the Draft document published in 2015. The separation guidance for the relevant category is provided as outlined in Table 3.4 (note the site is not a Vanadium Mine and thus that category does not apply in this instance).

Table 3.4 – Environmental Assessment Guideline for Separation Distances between Industrial and Sensitive Land Uses (2015) Industry

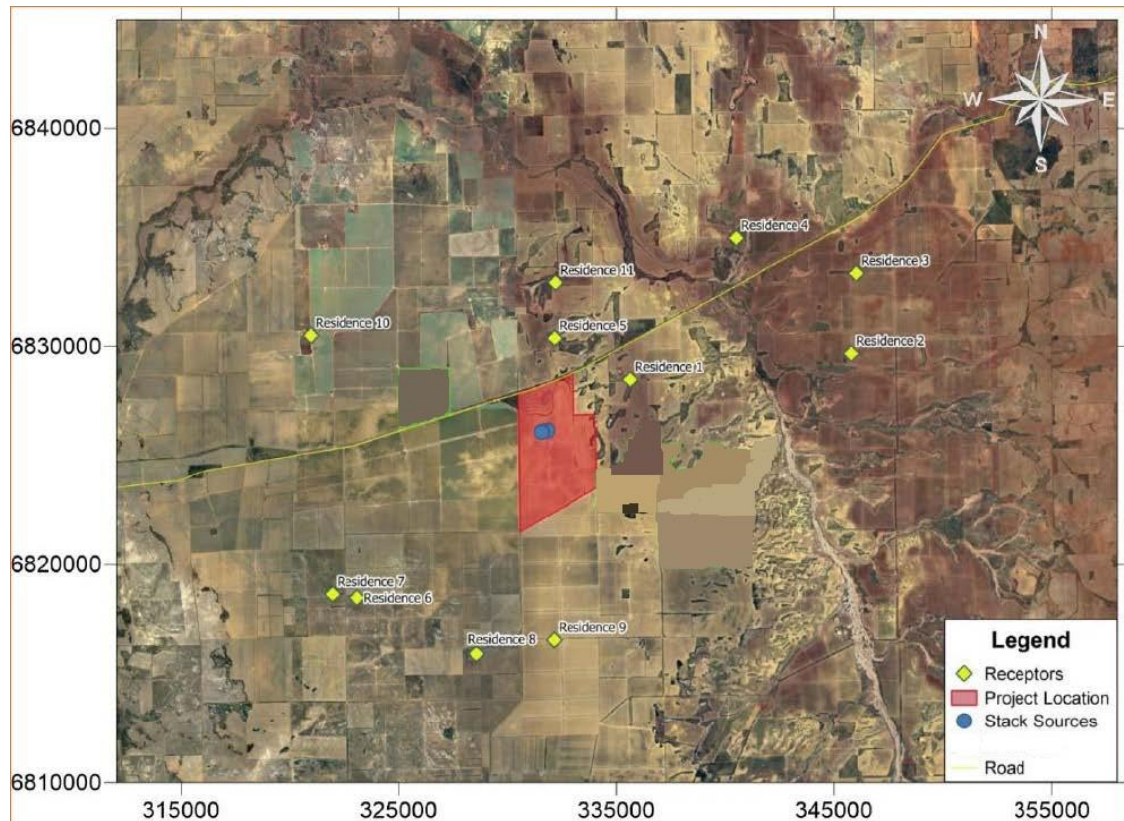
Industry	Description	Buffer (m)
Metal smelting, refining, melting, casting, fusing, roasting or processing works (DWER Licence Category 44)	where metal, metal ores, concentrates or wastes are treated to produce metal (other than iron & aluminium): up to 100 tonnes per year	100-200
	between 100 & 1000 tonnes per year	300-500
	<i>greater than 1000 tonnes per year</i>	Case by case depending on the process.

In this instance consideration of a 'case by case' separation distance is required.

AVL has completed preliminary modelling of noise, dust and particulates for the vanadium plant, based on the current layout/design of the plant itself. This work was completed by a specialist consultant for the company. It was found that there would be no exceedance of relevant environmental air quality criteria


beyond the boundaries of Lots 40 and 41. Based on this information, there are no requirements for planning controls (such as Special Control Areas) beyond the site boundaries.

An extract from the modelling document showing the extent of potential impacts (in red) is shown below.




Site-Specific Modelling of Air Quality – noting location of the plant and the boundary of the Amendment Site

PROPOSED AVL PROCESSING PLANT – EMISSIONS MODELLING, FEB 2023



- Air quality assessment and emissions modelling conducted by Environmental Technologies & Analytics Pty Ltd (Nov 22 – Feb 23). Report No. 1333
- Work completed according to the following guidelines, standards & sources:
 - Air Quality Modelling Guidance Notes (DoE, 2006)
 - Guideline – Air Emissions ,draft for external consultation (DWER), 2019)
 - Guideline – Dust Emissions ,draft for external consultation (DWER, 2021)
 - Mullewa Automatic Weather Station – Bureau of Meteorology
- Modelling:
 - CALMET/CALPUFF suite of models with meteorological data from the WRF prognostic model



1

Summary of modelling work completed

SPP 2.0 – Environment and Natural Resources Policy

State Planning Policy 2.0 was prepared by the WAPC in 2003 and aims to integrate environment and natural resource management with broader land use planning and to protect, conserve and enhance the natural environment.

Mineral production is referenced within Policy Measure 5.7 which states that “mineral resources, petroleum resources and basic raw materials are important natural resource assets and are a vital part of the economy”. This principle is recognized in the regional planning strategies referenced earlier in this chapter. The economic consideration of the project offers benefit to the State in export earnings, employment opportunity and potential to capture the value of downstream processes into products.

The project has been referred to the Environmental Protection Authority and will also be subject to the Department of Water and Environmental Regulation (DWER) assessment prior to future Works Approvals, Clearing Permits and Operating Licences. A comprehensive *EPA Referral Supporting Document* was submitted with the s.38 referral to EPA. The project’s Environmental Consultant Team undertook a preliminary assessment of the project against the EPA Key Environmental Factors and Department of Agriculture, Water and the Environment Matters of National Significance (MNES) to identify likely environmental impacts from implementation of the proposal.

The Environmental Consultant team found that,

“based on the preliminary environmental impact assessment, the Proposal is not expected to have a significant impact on the environment or any MNES. It’s possible that there would be an impact on significant flora listed if they cannot be avoided in locating the site entry and exit roads. The potential impact will be determined after a targeted flora survey is undertaken, and the road designs are finalised.”

Normally in these circumstances, a formal referral to EPA would not be warranted – however given the expectation from the City of Greater Geraldton and SDAU that the processing plant should be referred under s38, the formal referral occurred.

Table 3.5 below is extracted from the Environmental Referral document and outlines the environmental risk associated with the project, relevant to EPA Environmental Factors.

Table 3.5 - Relevant EPA Environmental Factors

Theme	Factor	Section	Classification	Basis of Classification
Land	Flora and Vegetation	6.0	Other decision-making authority	There is the potential for significant flora to be present in the proposed development envelope. While the Proposal will be designed to avoid impacts to significant flora, it may not be feasible to avoid all impacts. Any residual impacts can be assessed and managed through the native vegetation clearing permit process and under the <i>Biodiversity Conservation Act 2016</i> .
	Landforms	8.1	Not significant	No significant landforms identified.
	Subterranean fauna	8.2	Not significant	No direct impacts to subterranean fauna from Proposal activities. The groundwater source is the deep aquifer (>200 m below ground level) and is separated from the superficial aquifer.

Theme	Factor	Section	Classification	Basis of Classification
	Terrestrial Environmental Quality	7.0	Other decision-making authority	<p>There is the potential for impacts to terrestrial environmental quality from accidental release of environmentally hazardous materials. The potential impacts will be managed through typical industrial controls such as effective design, construction, and management of run-off and storage facilities.</p> <p>The Works Approval and licensing process administered by DWER under Part V of the EP Act can effectively assess the impacts to terrestrial environmental quality and ensure EPA objectives are maintained.</p>
	Terrestrial Fauna	8.3	Not significant	<p>No direct impacts to conservation significant fauna or habitat are expected. The proposal is primarily located within previously cleared land. The small amount of native vegetation clearing that will be required is not expected to significantly impact on terrestrial fauna values.</p>
Water	Inland Waters – Surface Water	8.4	Other decision-making authority	<p>There is the potential for impacts to surface water from accidental release of environmentally hazardous materials. The potential impacts will be managed through typical industrial controls such as effective design, construction, and management of run-off and storage facilities.</p> <p>The Works Approval and licensing process administered by DWER under Part V of the EP Act can effectively assess the impacts to inland waters, require regular sampling and reporting and ensure EPA objectives are maintained.</p>
	Inland Waters - Groundwater	8.5	Not significant	<p>Water for the Proposal will be sourced from the Irwin River-High Cliff Aquifer, over 200 m below ground level. No groundwater dependent ecosystems rely on this water source. An operating strategy, as required by DWERS for a 5c Extraction license is currently being developed and will be lodged to DWER by the end of February 2023.</p>
Air	Air Quality	8.6	Other decision-making authority	<p>The closest sensitive human receptor is Wyalong Homestead, 3.2 km from the Proposal. Potential impacts associated with particulate and other air emissions can be managed using standard practices.</p> <p>The Works Approval and licensing process administered by DWER under Part V of the EP Act can effectively assess the impacts from air emissions, require regular sampling and reporting and ensure EPA objectives are maintained. In addition, the project proposes to employ Global Best practice in terms of air emissions from all stacks for its detailed plant designs. A screening assessment has shown that no buffers are required outside the boundaries of the proposed lots. It is expected that Air emissions modelling will confirm this view, the results of which will be available by the end of January 2023. This is in line with the approach adopted by other similar recent projects in the state i.e. Tianqi Lithium (Kwinana), Albemarle Kemerton and Covalent Lithium (Kwinana).</p>

Theme	Factor	Section	Classification	Basis of Classification
	Greenhouse Gas Emissions	8.7	Not significant	Scope 1 greenhouse gas emissions will be less than 100,000 tonnes per annum. AVL is committed to minimizing direct greenhouse gas emissions where feasible.
People	Social Surroundings	8.8	Not significant	<p>The proposal has been designed to minimise potential impacts to social surroundings such as visual amenity, fugitive dust emissions, loss of agricultural productivity and increase in traffic movements.</p> <p>Once the proposal location was selected AVL consulted with landowners in the locality to inform them about the project. Nearby landowners were supportive of the project following initial and ongoing consultation that has occurred over the last 12-18 months. Advertisement of the initiated amendment is expected to confirm the residual impact to social surroundings is low and offset by likely benefit to local economy.</p>
	Human Health	8.9	Not significant	The closest sensitive human receptor is Wyalong homestead, 3.2 km from the Proposal. Site specific modelling of the plant design indicates there is no impact to properties from off-site emission in the future.

Source: Tenindewa Vanadium Processing Facility; S38 EPA Referral Supporting Document (Umwelt 2022)

Other State Planning Policy

Table 3.6 addresses State Planning Policies relevant to the project.

Table 3.6 - State Planning Policy Response

State Planning Policy	Response
SPP1 – State Planning Framework	<p>The State Planning Framework was prepared by the WAPC in 2017.</p> <p>It sets out the key principles relating to environment, community, economy, infrastructure, regional development and governance to guide the way in which future planning decisions are made. More specifically, the Framework identifies relevant policies and strategies used by the Commission in making decisions.</p> <p>The various planning policies and strategies identified in this section are recognised in SPP1.</p>
SPP 2.9 – Water Resources (incl draft)	<p>The objectives of this policy are to:</p> <ol style="list-style-type: none"> 1. protect, conserve, and enhance water resources that are identified as having significant economic, social, cultural and/or environmental values; 2. assist in ensuring the availability of suitable water resources to maintain essential requirements for human and all other biological life with attention to maintaining or improving the quality and quantity of water resources; and 3. promote and assist in the management and sustainable use of water resources. <p>A draft revision of SPP2.9 was released in August 2021 and contains an updated set of policy provisions. The intent of the policies is to ensure that planning/development considers water resource management at the appropriate time.</p> <p>In this instance, there are limited surface water and groundwater resources available on the site.</p> <p>It is proposed to use groundwater for the project, being drawn from the deep, brackish aquifer. The majority of the other groundwater users in the vicinity use the shallower superficial aquifer which is independent of the deep aquifer.</p> <p>There should therefore not be impact by the project on the shallow aquifer. All water used in the processing of vanadium will be managed, treated and retained on site.</p> <p>Management of water will be subject to further review as part of the environmental approvals process.</p>
SPP3.7 – Planning in Bushfire Prone Areas	<p>State Planning Policy 3.7 – Planning in Bushfire Prone Areas was prepared by the WAPC in 2015. It provides the foundation for land use planning to address bushfire risk management in Western Australia and to inform and guide decision-makers, referral agencies and landowners to help achieve acceptable bushfire protection outcomes. It applies to development in designated bushfire prone areas.</p> <p>The latest DPLH mapping (2019) identifies <i>Bushfire Prone Areas</i> in some areas of the site, namely on and adjoining areas of remnant vegetation. The development application will address this.</p>

State Planning Policy	Response
SPP 5.4 – Road and Rail Noise	<p>SPP 5.4 applies to the preparation and assessment of planning instruments, including region and local planning schemes; planning strategies, structure plans; subdivision and development proposals in Western Australia, where there is proposed:</p> <ul style="list-style-type: none"> • noise-sensitive land-use within the policy’s trigger distance of a transport corridor as specified in Table 1; • new or major upgrades of roads as specified in Table 1 and maps (Schedule 1, 2 and 3); or • new railways or major upgrades of railways as specified in maps (Schedule 1, 2 and 3); or any other works that increase capacity for rail vehicle storage or movement and will result in an increased level of noise. <p>In the case of this application, the project is not considered a ‘noise sensitive land use’. It also does not involve new or major road/rail upgrades and as such, the provisions of SPP5.4 do not apply.</p>

WA Regional Development Strategy

The initiation of the Scheme amendment is a potential enabler of the WA Regional Development Strategy. This strategy focusses on the development of renewable energy through solar, wind and green hydrogen. Mining companies are searching for green renewable energy (either through production or offsets) as their strategy to achieve investor and shareholder objectives for climate responsible production.

The WA Government recently announced commitment to renewable energy and associated technologies for regional WA and this proposed plant delivers this on the ground. Hydrogen hubs are being proposed at several regional locations in WA by the WA Government. These are linked to generation and storage of renewable energy to be achieved via static batteries.

Geraldton is identified as a location for hydrogen hub with focus to promote and facilitate renewable forms of energy and its storage. This aligns with the establishment of a vanadium ore enrichment plant to produce constituent materials for static battery production. Batteries are required for the storage of energy derived from hydrogen and the proximity of a vanadium plant can advance the local resourcing of these future energy plans. Vanadium Flow Batteries are an efficient and effective technology for static battery storage.

These strategy imperatives give impetus to delivering the State commitment should this project proceed at this site and according to AVL timetable. The project may catalyse other investment in Greater Geraldton to become a renewable energy and battery production hub. Although there has currently been no commitment to local production of batteries, this result may be more likely to arise in the Geraldton region provided there is definite strategic commitment, planning and follow-through by government.

3.2. Local Planning Framework

Local Planning Strategy 2015

The Local Planning Strategy (LPS) was endorsed by the WAPC in 2015. It brought together the previous strategies of Geraldton, Mullewa and Greenough. The Strategy identifies the eastern part of the greater city as potential for economic growth however the LPS does not expand the gazetted townships, including Tenindewa, other than to ensure that appropriate services and facilities can be provided in Mullewa.

The LPS also identifies a range of Development Investigation Areas (DIAs). DIA9 (Eradu) was identified in the LPS to consider “industrial opportunities for land generally in proximity to the convergence of the Geraldton-Mount Magnet Road, the Mullewa to Geraldton narrow gauge railway and the Dampier to Bunbury Natural Gas Pipeline”. The LPS also reasoned that it was necessary for an “industrial location in the rural hinterland around Eradu to accommodate other larger industry not appropriate in other industrial areas including Narngulu”.

The initiation of the amendment on this site signifies a justification of the DIA9 intention, to introduce a major source of employment and economic activity will catalyse further investment in this locality.

Whereas DIA9 itself is not suitable for the vanadium processing plant (which was addressed in the MCA) because there is a lack of landowner support in the Eradu area for industrial land uses and a site could not be advanced to meet the vanadium plant timeframe.

The difficulties establishing industrial zoning/land uses within the Eradu area has not however negated the need by large operators, such as AVL, to seek sites outside of existing zoned industrial land areas in the Greater Geraldton area. The proposal of the additional ‘industry’ use on the proposed site is consistent with this identified need. The results of the MCA justify renewed investigation for additional land area and location within the rural hinterland close to the established infrastructure.

Given that the subject site is located east, in close proximity to the convergence of the Geraldton-Mount Magnet Road, the Mullewa to Geraldton narrow gauge railway and the Dampier to Bunbury Natural Gas Pipeline, the site at Lot 40 & 41 complies with the general intent of the LPS.

There is the potential of the City to further investigate the development of DIA near the subject site. This additional investigation will require modification to the LPS when reviewed to relocate the DIA.

The Strategy identifies a need to encourage investment into Mullewa to support housing and employment opportunities. The development of a processing plant close to this town will assist in diversifying the regional economy and bring employment opportunities to Mullewa, and the broader Greater Geraldton and Midwest Region.

The LPS reflects the intention of the Mid-West Planning Framework to better connect the proposed Oakajee Port to the eastern areas of the City with improved new regional road and rail links. Since 2015 to the present date there has been no delivery of this framework or strategy by government commitment to advance the Oakajee Port, the Strategic Industrial Area or proposed road and rail links.

The vanadium processing plant in Tenindewa heralds the type of investment which once operating, may provide a catalyst for renewed interest in establishing a port and better road and rail connections. Until these works and a strategic industrial area are advanced, it is doubtful industry or transport logistics within this Region will be realised; a situation which requires each proponent to seek its own site based on site selection suited to that specific project.

The adopted Local Planning Strategy identifies the need to focus on the economic development in the eastern districts of the City however there is an undefined role for the eastern part of the greater city area. This section of the LPS vision is relevant to the proposal:

“Economy –

A dynamic, diverse, and sustainable economy. We value a healthy thriving economy that provides diverse employment opportunities while protecting the environment and enhancing social and cultural outcomes.”

This amendment (if initiated for this proposal) achieves this vision and principle due to the potential to introduce an important downstream industry – beneficiating and adding value to raw materials within the region to boost

net product for the region. This will reduce reliance of the Mid West Region on external resources. This proposal will increase local capture of value from processing nearby mineral resources and distribute this additional value via the local community into the Greater Geraldton community.

Transport and Mullewa

“Mullewa has a regional role in transport movements and resource activity, with potential to operate as a future rail hub to Geraldton. This potential needs to be secured through protecting existing and proposed road and rail alignments.”

The proposed site can aid the delivery of this strategy objective because it is adjacent to the Geraldton-Mount Magnet Road and the railway. It is close to and already well connected by road and by rail both to Mullewa and Geraldton Port.

Renewable energy

“The City is home to renewable energy facilities including the Alinta Wind Farm, Mumbida Wind Farm and Greenough River Solar Farm, which currently produce a combined 155MW of green power. This is a significant supply, as the Alinta Wind Farm currently produces electricity supply for an equivalent of 64,000 homes per year. Expansions of renewable energy facilities are also being contemplated, which could increase the number of wind 23 turbines in the area to 195 additional turbines creating a potential 750MW of green power and increase solar energy production to 40MW. The area has also been identified for potential geothermal energy sources, wave energy (which via desalination can also produce fresh water) and biomass. As recognised in the Greater Geraldton Economic Development Strategy (2013-2023), renewable energy projects are poised to take advantage of the solar, wind, wave, and geothermal resources available within the region.”

The proposed AVL plant will include the development of a solar energy facility to assist with powering the plant site. Other opportunities for renewable energy may be incorporated into the sit in future.

Local Planning Scheme

Lots 40 and 41 are zoned Rural in LPS 1 . The amendment is to add the use Industry as permissible within the Rural zone. A vanadium processing plant is a stand-alone facility which has been selected on this site based on an MCA rather than having regard for the Rural zone objectives. These objectives are therefore not framed with this type of industrial proposal in mind.

The objectives of the Rural zone are as follows:

Rural zone Objective	Relevance
(a) provide for the maintenance or enhancement of specific local character.	Industry – the processing plant in the location has not been selected for this objective.
(b) protect broadacre agricultural activities, such as cropping and grazing, and intensive uses, such as horticulture, from incompatible uses and minimise land use conflicts.	Industry – the processing plant in the location has not been selected for this objective.
(c) provide for a range of non-rural land uses where they have demonstrated benefit and are compatible with the surrounding rural uses.	Industry – the processing plant in the location has not been selected for this objective, however the plant will have very little actual impact either positive or negative upon adjacent Rural uses.
(d) protect and provide for existing or planned key infrastructure, public utilities and renewable energy facilities.	Industry – the processing plant in the location avails itself of road and rail infrastructure and may in the future be able to use renewable energy on-site, and act as an enabler for renewable power to the locality.

The proposed vanadium plant falls within the definition of 'Industry' within the Local Planning Scheme. This definition states:

Industry means premises used for the manufacturing, dismantling, processing, assembly, treating, testing, servicing, maintenance or repairing of goods, products, articles, materials or substances and includes facilities on the premises used for any of the following purposes:

- (a) the storage of goods;*
- (b) the work of administration or accounting;*
- (c) the selling of goods by wholesale or retail;*
- (d) the provision of amenities for employees;*

Currently, the land use of 'Industry' is not permitted within the Rural zone. This amendment will, however, make the use a discretionary use on this site alone. The amendment will not have any effect on surrounding lots or other land zoned Rural within the City's scheme.

The schedule in Appendix 1 of the Scheme will note this Additional Use for the specific site and will further define the use of Industry to be for a vanadium processing plant to be:-

*Industry' is restricted to the processing of vanadium includes ancillary and associated uses.
Other conditions shall be as determined by the Local Government.*

The amendment, once initiated will be referred to the WAPC (DPLH) for review and then if acceptable it will be advertised for public comment as per the conventional scheme amendment process

Upon completion of the amendment the City or a responsible authority such as the Commission is able to assess a development application whereby the proposal should meet those requirements of the Schedule as well as any development design and control requirements deemed necessary.

The use is to be a **D** use which grants the authority the discretion to consider and approve the development. Given the extent of public advertisement of the vanadium plant via the EPA s.38, the DWER Works Assessment Approval and the SDAU as well as the Scheme Amendment – it is sufficient for the use to be classed as D or at the discretion of the approval authority.

In terms of the discretion the Schedule confines the type of industry to a vanadium plant and any ancillary or associated uses. It is a clearly defined remit for the development to be assessed noting that initially it will be the SDAU making the determination with input from the City of Greater Geraldton. Ongoing development control of subsequent or additional development is likely to be the responsibility the City.

Local Planning Policies

There are no specific local planning policies which would specifically apply to the City consideration of this Scheme amendment proposal. For matters of a design and plant layout concern the City will be consulted by the SDAU as per usual development assessment processes, and certain Local Planning Policies will be referenced during that process.

4.0 PROPOSAL FOR ADDITIONAL USE – ‘INDUSTRY’

It is proposed to amend the City of Greater Geraldton Planning Scheme No.1 by adding the Use – “Industry” to the Rural zone for Lots 40 and 41 Geraldton – Mount Magnet Road Tenindewa.

4.1. Planning Justification

The vanadium processing plant is proposed for the site based upon a site selection process and will be assessed for its environmental, planning and development suitability. A site for the plant needs to meet several site selection criteria based upon environmental, commercial social and economic considerations.

The Scheme amendment is to allow *Industry* as an additional use in the Rural zone for Lots 40 and 41 and does not remove any land from the Rural zone and operating plant will not affect surrounding uses.

Justification for the amendment has been provided in this document, consideration the site assessment process undertaken by AVL and the consideration of the planning framework. It is noted that the inclusion of an additional use for Industry on this rural site has no effect on the implementation of the broader regional and local planning frameworks.

The likely economic return from this plant its construction and operation to the Geraldton region and the State and the local community is much greater than any loss of crop area for that portion of the site.

4.2. Summary

Benefits

- This site in the rural zone context is surrounded by cropping uses. The plant can be managed to be compatible to continued rural cropping use on adjacent land.
- Amendment will accommodate the vanadium enrichment plant to allow downstream processing of a mineral concentrate and to deliver added value to the regional economy.
- Tenindewa is a site well connected to Geraldton Port and Mullewa with a direct transport route between source, plant and port using options of road or rail transport.
- Ongoing employment for the operation of the plant can enhance the Mullewa townsite and its local economy and attract further investment.
- The employment during both the construction and operation stages of the facility will offer local people more diverse opportunities for work.
- Facilitation of the plant and associated leading technology can deliver Australia and other countries to more sustainable energy storage and use to meet global and local climate and greenhouse gas challenges.
- This investment may provide the catalyst to trigger the WA Government and the City to advance the regional and local planning framework ideas into actions in respect to favour resolving regional industry and port development.

Management

- DWER Works Approval conditions will manage on-site risks and institute detailed monitoring and reporting of industrial impacts on natural systems from operations.
- WAPC Development Approval will consider management of traffic flow to moderate additional vehicle impacts through the provision of access points, landscape impact and sufficient site provision for all vehicles and plant-related logistics.
- The City via WAPC and DWER decisions may address landscape impacts and screening to mitigate visibility of the plant and associated operations on the rural landscape
- Based on current modelling, all buffers will be contained within the property boundaries.

State, Regional and Local planning framework considerations

- The proposal is a one-off facility with its own locational requirements and does not require colocation with other industries.
- AVL has undertaken MCA appraisal of the proposal and site options before identifying the site at Tenindewa as the best site for the operation of the plant.
- The lack of a suitably zoned or located site has required AVL to undertake its own site selection study tailored for the vanadium processing plant which is justification for requesting this amendment.
- The local planning scheme DIA 9 identifies land east, location requirements generally align.
- The subject site is identified in AVL's MCA and Bankable Feasibility Study as ideal and best in the region for the plant development and operation.
- Once completed and operating the plant may provide impetus to deliver other aspects of the articulated State and local planning strategies.

5.0 CONCLUSION

The Australian Vanadium Limited project is a WA State Strategic Initiative with Lead Agency status by the WA government and Major Project Status by the Federal government. The Federal government has accordingly awarded a Modern Manufacturing Initiative (MMI) Collaboration Grant of \$49 million (\$A) to the project (to be paid upon the execution of approvals). The global market for battery minerals is highly competitive and so a timely entry date to this emerging market is a priority for the AVL product.

This Scheme Amendment is necessary to allow the SDAU/WAPC to consider a development application for processing plant within the rural zone. This report identifies that the proposal is generally consistent with the state, regional and local planning frameworks and offers numerous local benefits in terms of social and economic investment.

Consent to advertise the Amendment will coincide with the assessment of development and environmental stages of this proposal by the DWER and WAPC/SDAU) during the first quarter of 2023.

FORM 4A

Planning and Development Act 2005

RESOLUTION TO AMEND LOCAL PLANNING SCHEME

City of Greater Geraldton Local Planning Scheme No.1 Amendment No.18

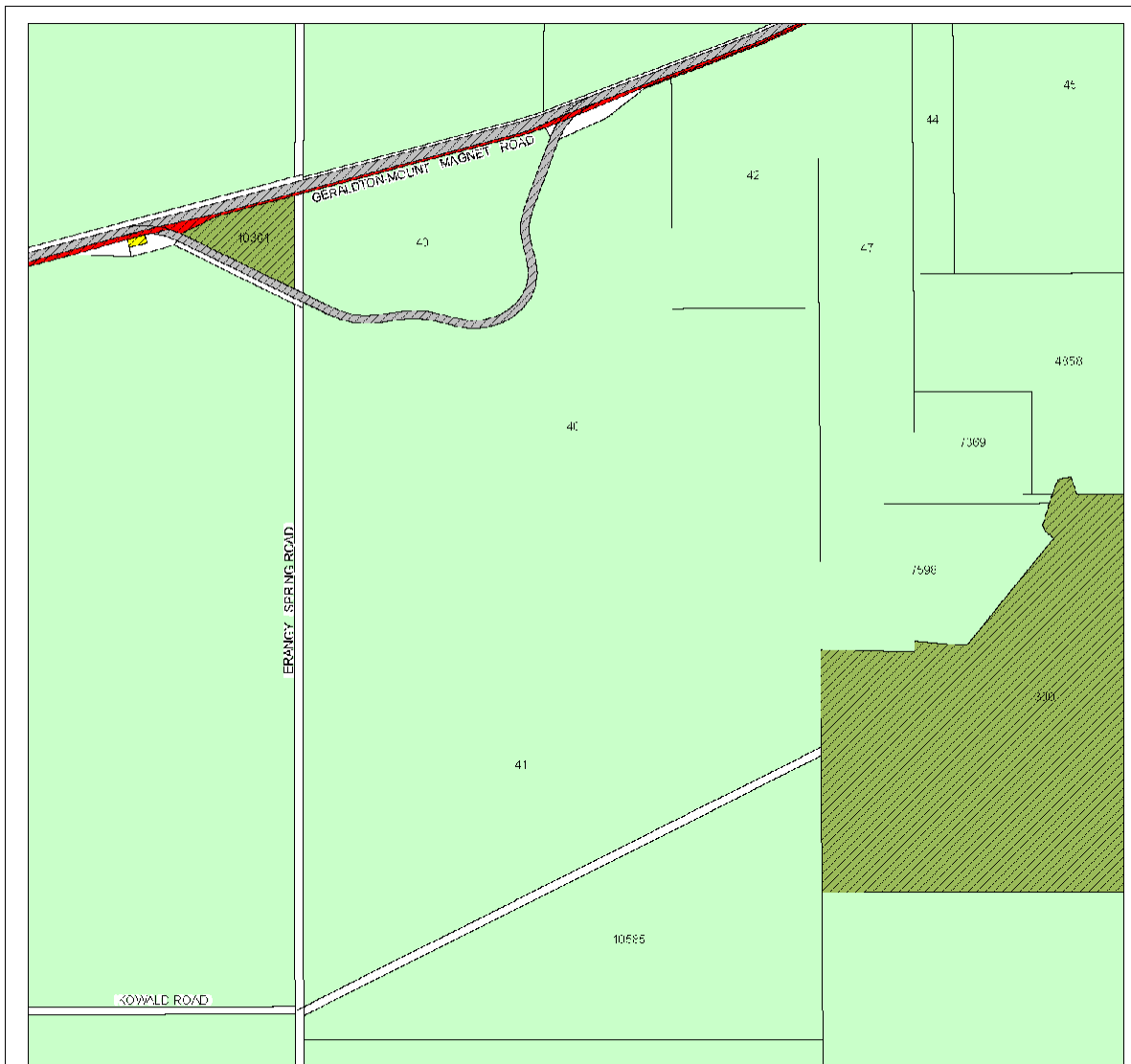
Resolved that the City of Greater Geraldton pursuant to section 75 of the *Planning and Development Act* 2005, amends the above Local Planning Scheme by

1. Inserting the following additional uses into Schedule 1

No.	DESCRIPTION OF LAND	ADDITIONAL USE	CONDITIONS
A19	Lots 40 and 41 Geraldton-Mount Magnet Road Tenindewa	Industry 'D' use	<ol style="list-style-type: none">1. 'Industry' is restricted to the processing of vanadium includes ancillary and associated uses2. Other conditions shall be as determined by the Local Government.








2. Amending the Scheme Maps accordingly.

AMENDMENT MAP



EXISTING SCHEME MAP

Legend

-  Cadastral with Lot number
-  Railways
- LPS Zones**
-  Rural
- LPS Reserves**
-  Environmental conservation reserve
-  Local road
-  Primary distributor road
-  Public purposes



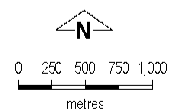
**Department of Planning,
Lands and Heritage**

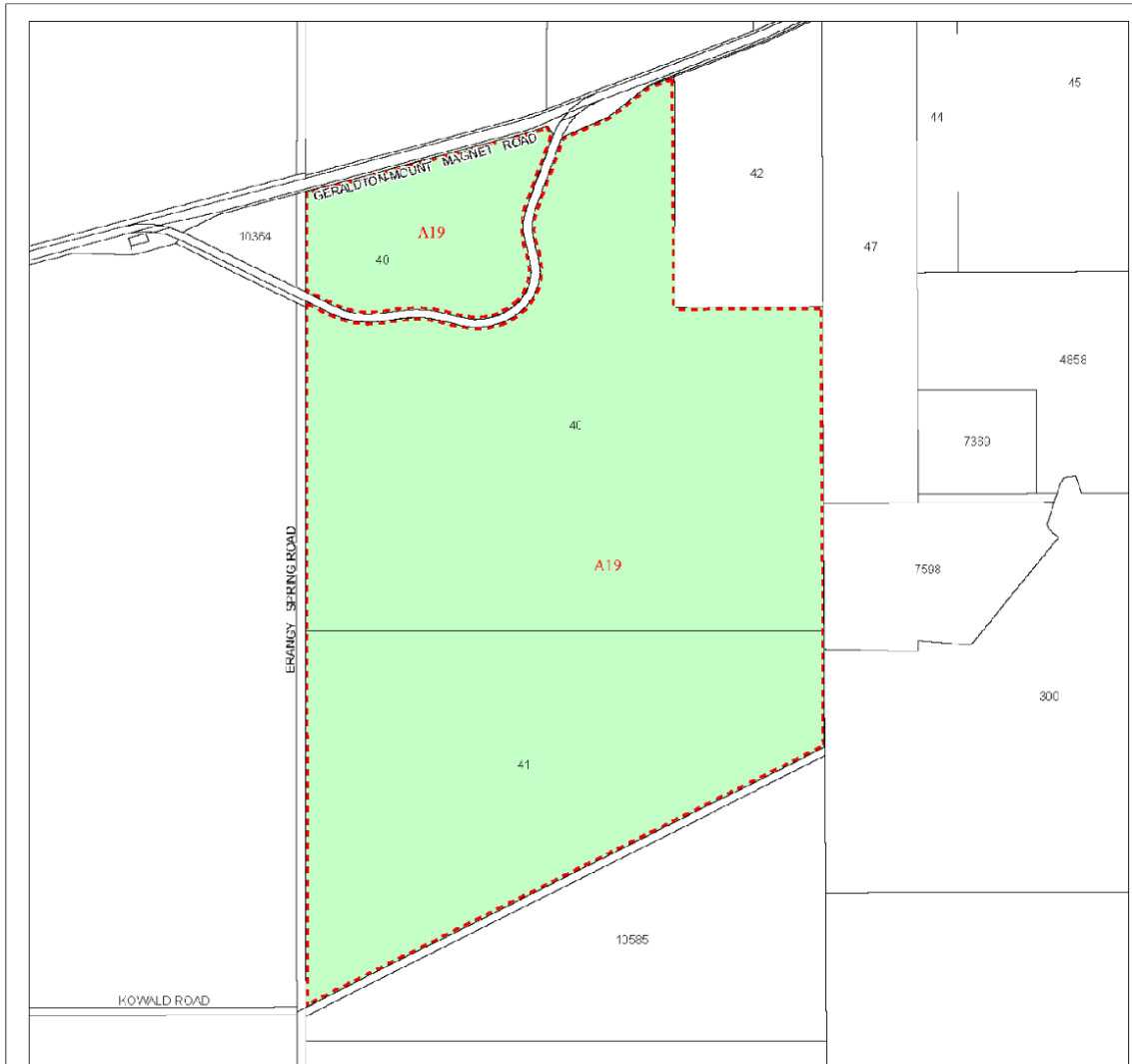
City of Greater Geraldton

Local Planning Scheme No. 1

Amendment No. 18




Produced by Data Analytics
Department of Planning, Lands and Heritage, Perth WA
Base Information supplied by Western Australia
Land Information Authority SLIP 180 2020 1





PROPOSED SCHEME AMENDMENT MAP

Legend

-  Cadastre with Lot number
- LPS Zones and Reserves Amendments**
-  Rural
-  A19 Additional use



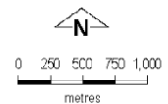
**Department of Planning,
Lands and Heritage**

Produced by Data Analytics,
Department of Planning, Lands and Heritage, Perth WA
Basis information supplied by Western Australian
Land Information Authority SLIP 1180-2020-1

City of Greater Geraldton

Local Planning Scheme No. 1

Amendment No. 18



FORM 5A

COUNCIL ADOPTION

This Complex Amendment was adopted by resolution of the Council of the City of Greater Geraldton at the _____ Meeting of the Council held on the _____ day of _____, 202____.

..... MAYOR

..... CHIEF EXECUTIVE OFFICER

COUNCIL RESOLUTION TO ADVERTISE

by resolution of the Council of the City of Greater Geraldton at the _____ Meeting of the Council held on the _____ day of _____, 202____, proceed to _____.

..... MAYOR

..... CHIEF EXECUTIVE OFFICER

COUNCIL RECOMMENDATION

This Amendment is recommended for _____ by resolution of the City of Greater Geraldton at the _____ Meeting of the Council held on the _____ day of _____, 202____ and the Common Seal of the City of Greater Geraldton was hereunto affixed by the authority of a resolution of the Council in the presence of:

..... MAYOR/-
-

..... CHIEF EXECUTIVE OFFICER
-

WAPC ENDORSEMENT

..... DELEGATED UNDER S.16 OF THE P&D ACT 2005

DATE.....

APPROVAL GRANTED

..... MINISTER FOR PLANNING

DATE.....

Appendix A

MCA Template

EXCERPT – Multi-Criteria Assessment of Tenindewa Site – (Commercial in Confidence)

				Site Name			
Aspect	Question	Potentially Relevant Impacts (to or from the Project)	Assumptions, Basis of Assessment, Proposed Controls	Confidence	Consequence	Risk Rating	Possible Further Work or Additional Management Strategies
Native flora and vegetation	Is there conservation significant flora, ecological communities or nature reserves within 500m of the site?						
Native terrestrial fauna	Is there significant habitat for native fauna within 500m of the site?						
Subterranean fauna	Will there be significant groundwater abstraction specific to the project and is there likely to be significant subterranean fauna near the groundwater abstraction location?						
Landforms	Is there an ecologically or socially significant landform that will be impacted by the project (e.g. unique, of scientific interest, important cultural values)?						
Terrestrial environmental quality	Is the proposed site, or land within 500m of the site, uniquely high value agricultural land?						
Inland waters - groundwater use	Will there be significant groundwater abstraction specific to the project and is there a sensitive groundwater receptor nearby to the groundwater abstraction area (e.g.						

Aspect	Question	Potentially Relevant Impacts (to or from the Project)	Assumptions, Basis of Assessment, Proposed Controls	Confidence	Consequence	Risk Rating	Possible Further Work or Additional Management Strategies
	significant flora, wetland, bores)?						
Inland waters - groundwater contamination	Is there a sensitive groundwater receptor within 500m of the site (e.g. drinking water source protection area, PEC for stygofauna, wetland, groundwater bore used for agricultural or domestic use)?						
Inland waters - surface water contamination	Is there a sensitive surface water receptor within 500m of the site (e.g. surface water body)?						
Inland waters - surface water flow	Is there a surface- water dependent receptor downstream of the site that is likely to be impacted by changes to surface water flow pathways (e.g. agricultural dam, wetland)?						

Aspect	Question	Potentially Relevant Impacts (to or from the Project)	Assumptions, Basis of Assessment, Proposed Controls	Confidence	Consequence	Risk Rating	Possible Further Work or Additional Management Strategies
Air quality	<p>Are there sensitive human receptors within 500m to 3km of the proposed plant location?</p> <p>Sensitive receptor includes human residence but not areas with low intensity/incidental use (e.g. sheds). Employees of the mine are not considered sensitive receptors as this is managed under occupational health and safety regulations.</p>						
Social surroundings - noise and vibration	<p>Are there sensitive human receptors within 500m to 3km of the proposed plant location?</p> <p>Sensitive receptor includes human residence but not areas with low intensity/incidental use. Employees are not considered sensitive receptors as this is managed under occupational health and safety regulations.</p>						
Social surroundings - visual amenity	<p>Are there any residences with line-of-sight to the proposed plant location?</p>						
Social surroundings - light pollution	<p>Are there any residences with line-of-sight to the proposed plant location?</p>						
Heritage	<p>Are there any non-developed areas that are likely to be culturally significant or</p>						

Aspect	Question	Potentially Relevant Impacts (to or from the Project)	Assumptions, Basis of Assessment, Proposed Controls	Confidence	Consequence	Risk Rating	Possible Further Work or Additional Management Strategies
	contain Aboriginal artefacts?						
Native title	Are there any areas of non-Freehold land within the proposed site that are subject to Native Title claims?						
Native title	Are there any areas that are subject to Native Title claims that will be passed on entrance/exit to the site?						
Stakeholder acceptance	Is there resistance/opposition from local community within 1km, regardless of impacts?						
	Is there resistance/opposition from local community within 1-3km, regardless of impacts?						
	Is there resistance/opposition from local community within 3-10km, regardless of impacts?						
	State Government attitude and support for the site						
	Local Government attitude and support for the site						
	WAPC attitude and support for the site, including re-zoning						
	Main Roads WA attitude and support for the site						
	Will the project lead to socio-economic benefits to the local community						

Aspect	Question	Potentially Relevant Impacts (to or from the Project)	Assumptions, Basis of Assessment, Proposed Controls	Confidence	Consequence	Risk Rating	Possible Further Work or Additional Management Strategies
	(other than Geraldton)?						
Workforce	Will the workforce be stable through the economic cycle?						
	Does the site location support a non-FIFO workforce with a reasonable transport distance?						
Site condition	Ground conditions						
	Topography						
	Exposure to flooding						
	Exposure to fire risk						
	Existing infrastructure requiring removal or management (bores, electricity etc)						
	Ability to interface with farm						
Infrastructure	Gas available						
	Water available						
	Road Access						
	Rail line access						
	Power available						
						SCORE	

Appendix B

Certificates of Title

WESTERN



AUSTRALIA

REGISTER NUMBER N/A	
DUPLICATE EDITION 2	DATE DUPLICATE ISSUED 21/5/2013

RECORD OF CERTIFICATE OF TITLE
UNDER THE TRANSFER OF LAND ACT 1893

VOLUME **2216** FOLIO **19**

The person described in the first schedule is the registered proprietor of an estate in fee simple in the land described below subject to the reservations, conditions and depth limit contained in the original grant (if a grant issued) and to the limitations, interests, encumbrances and notifications shown in the second schedule.

BGRoberts
REGISTRAR OF TITLES



THIS IS A MULTI-LOT TITLE

LAND DESCRIPTION:

LOTS 40 & 41 ON DEPOSITED PLAN 28736

REGISTERED PROPRIETOR:
(FIRST SCHEDULE)

WYALONG PASTORAL CO PTY LTD OF "STUDBROOK", TENINDEWA VIA GERALDTON
(A H872012) REGISTERED 20/11/2001

LIMITATIONS, INTERESTS, ENCUMBRANCES AND NOTIFICATIONS:
(SECOND SCHEDULE)

1. K644327 MORTGAGE TO RABOBANK AUSTRALIA LTD REGISTERED 1/7/2008.

Warning: A current search of the sketch of the land should be obtained where detail of position, dimensions or area of the lot is required.
* Any entries preceded by an asterisk may not appear on the current edition of the duplicate certificate of title.
Lot as described in the land description may be a lot or location.

-----END OF CERTIFICATE OF TITLE-----

STATEMENTS:

The statements set out below are not intended to be nor should they be relied on as substitutes for inspection of the land and the relevant documents or for local government, legal, surveying or other professional advice.

SKETCH OF LAND: DP28736
PREVIOUS TITLE: 1352-391
PROPERTY STREET ADDRESS: NO STREET ADDRESS INFORMATION AVAILABLE.
LOCAL GOVERNMENT AUTHORITY: CITY OF GREATER GERALDTON

WESTERN



AUSTRALIA

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DUPLICATE EDITION 2	DATE DUPLICATE ISSUED 21/5/2013

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