

5 May 2026

CBH NARNGULU PROPOSED WAREHOUSE / STORAGE LOT 14 ON DEPOSITED PLAN 76594

CBH is seeking development approval from the City of Greater Geraldton for a proposed 'Warehouse/Storage' land use at CBH Narngulu grain site on Arthur Road, Narngulu. The subject application has been prepared in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the *Planning and Development (Local Planning Schemes) Regulations 2015* and the provisions of *City of Greater Geraldton Local Planning Scheme No. 1*.

SITE DETAILS

The subject site is legally described as Lot 14 on Deposited Plan 76954 and is wholly contained within Certificate of Title volume 2829, folio 767. The subject site is located approximately 8 kilometres south-east of the Geraldton townsite and 13 kilometres south-east of the CBH Geraldton Port Terminal and West End site, as shown in the Location Plan below.

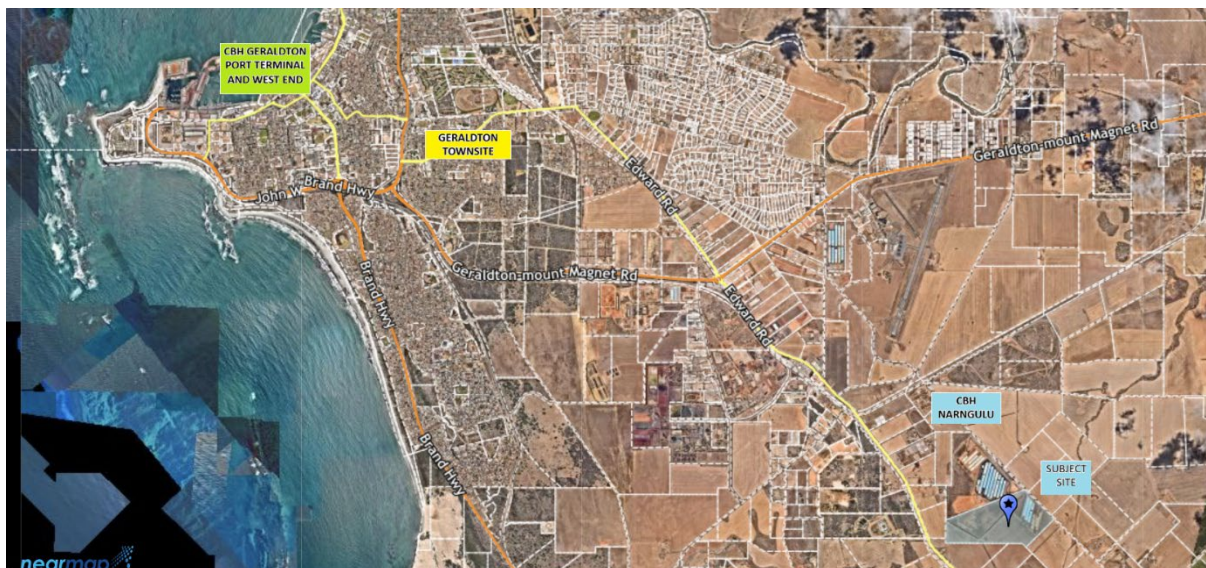


Figure 1 - Location Plan

CONTEXT AND LAND USE

The subject site is located within the jurisdiction of the City of Greater Geraldton. The subject site is surrounded by rural zoned land that accommodates a range of land uses, being single houses or vacant rural land.

Vehicle access to the storage compound will be provided via the existing CBH crossovers off Arthur Road and existing internal access roads, following the same traffic flow paths as the grain site. Arthur Road is classified as a local road under the City's operative planning scheme.

Lot 15

Immediately to the north of the subject site is Lot 15, which is also owned by CBH. There is an existing approved grain stockpiling land use over Lot 15, which is where the majority of CBH bulkheads (temporary and permanent) are located.

Lot 14

There is an existing grain stockpiling land use approved for Lot 14. Three bulkheads were approved by the City in September 2025 under Development Approval No. TPS25/137.

The proposed dangerous goods storage compound will be located on a vacant portion of Lot 14, between the existing approved grain stockpiling bulkheads on Lot 15 and Lot 14.

The proposed 'warehouse/storage' land use is in addition to the existing grain stockpiling land use approved over Lot 14. The dangerous goods storage compound is incidental to the primary land use, as it is related to and in support of CBH grain stockpiling activities. The chemicals stored in the compound are used by the Grain Protection team to fumigate grain, which is necessary to ensure CBH meets the phytosanitary requirements of the countries that BH exports grain to.

BACKGROUND

CBH currently has a dangerous goods storage compound at its Geraldton West End (Haigh Street) site. This compound provides the CBH Grain Protection team with access to necessary resources to service the 20 grain receival sites in the Geraldton zone, from Binu in the north to Marchagee in the south.

The existing West End compound stores and handles dangerous goods in quantities that require a licence under the *WA Dangerous Goods Safety (Storage and Handling of Non-Explosives) Regulations 2007*. Consequently, CBH holds an existing DG licence (**DGS022072**) for the West End site.

However, the highly saline, windy environment at West End has already resulted in significant corrosion of the steel infrastructure within the storage compound. Based on this, and its proximity to light industrial properties (within 70m), CBH proposes to relocate the Geraldton dangerous goods storage compound from West End to a more suitable, inland, remote site at Arthur Road, Narngulu.

The relocated storage compound at Narngulu will be of a similar design and construction to the existing storage compound at West End. The new compound will store and handle the same quantities of dangerous goods as the West End site. Therefore, the Narngulu site will also require a licence under the *WA Dangerous Goods Safety (Storage and Handling of Non-Explosives) Regulations 2007*. Consequently, CBH will need to apply for a new DG Licence for the Narngulu site and then later cancel the existing DG licence (**DGS022072**) for the West End site.

The main difference with the new storage compound proposed at CBH Narngulu is that the concrete pad will be larger than the one at West End, to allow additional space for a parking shelter to accommodate parking for two (2) Grain Protection trucks.

PROPOSAL

CBH is seeking development approval from the City for a 'warehouse/storage' land use. The purpose of seeking approval for this land use at Lot 14 Arthur Road is to allow the relocation of an existing dangerous goods storage compound from our West End facility to CBH Narngulu.

CBH has 13 dangerous goods compounds across its network, including the one proposed to be relocated from West End to Narngulu. Each zone has at least one dangerous goods storage compound, whilst some may have multiple.

The proposed dangerous goods storage compound will provide the CBH Grain Protection team with access to the required resources (e.g. fumigants) to service all the CBH grain receival sites within our Geraldton zone. This is the same purpose and function as the existing storage compound at West End.

The proposed development incorporates the following elements:

- Minor earthworks. It is proposed that the ground level at the storage compound will be raised by approximately 200mm to minimise potential for flooding.
- Short gravel driveway to the storage compound.
- Drainage. Stormwater runoff from the development will be tying into the existing stormwater drainage culverts on site.
- Construction of a 23m x 22m concrete pad (with apron).
- Construction of a high-density polyethylene (HDPE) lined wastewater collection area adjacent to the storage compound to allow for retention of any contaminated water in the event of significant incident (e.g. fire).
- Construction of a Vehicle Parking Shelter that provides space for parking for two (2) Grain Protection trucks.
- Relocation of moveable infrastructure from existing storage compound at West End, including:
 - Gas cylinder store (and associated deluge water sprinkler system)
 - Aluminium phosphide freight container and waste smartlocker.
 - Water tank and booster pump
 - Safety shower and eyewash station
 - Deluge water sprinkler controls
 - Fire extinguishers and fire hose reel.
 - Smaller items including bollards, lighting, emergency information containers (EICs), first aid kit, windsock, placarding and signage.
- Installation of new gates and security fencing around the storage compound.
- Construction of a secure Pest Control Shed adjacent to the compound.

The proceeding sections provide a detailed assessment of the proposed development against the applicable planning framework and outline other relevant considerations.

In support of this application, CBH has included a copy of the Dangerous Goods Risk Assessment (DGRA) report. This document includes detailed information relating to the dangerous goods storage compound and licence, risk identification and mitigation, and compliance requirements of the Dangerous Goods Regulations and relevant Australian Standards. This DGRA report was prepared by the CBH Dangerous Goods (DG) Specialist, who is an accredited DG consultant with the Department of Local Government, Industry Regulation and Safety (LGIRS).

TOWN PLANNING CONSIDERATIONS

Local Planning Scheme No. 1 – Land Use and Zoning

The subject site is zoned 'Rural' under the City's Local Planning Scheme No. 1 (LPS1).

Under the land use terms defined in clause 6.2 of LPS1, 'warehouse/storage' means premises including indoor or outdoor facilities used for: (a) the storage of goods, equipment, plant or materials; or (b) the display or sale by wholesale of goods.

On the basis that the primary function of the proposed dangerous goods storage compound is to store materials and equipment for CBH grain protection services, 'warehouse/storage' is considered to be the most applicable land use definition for the proposed development.

The proposed 'warehouse/storage' land use is an 'A' use within the 'Rural' zone under the LPS1 zoning table, meaning the use is not permitted unless the local government has exercised its discretion by granting development approval after giving notice in accordance with clause 64 of the deemed provisions.

The objectives of the 'Rural' zone are to:

- Provide for the maintenance or enhancement of specific local character.
- Protect broadacre agricultural activities such as grazing, and intensive uses, such as horticulture, from incompatible uses and minimise land use conflicts.
- Provide for a range of non-rural land uses where they have demonstrated benefit and are compatible with the surrounding rural uses.
- Protect and provide for existing or planned key infrastructure, public utilities and renewable energy facilities.

Further, in considering development applications, the local government shall have regard to:

- The Department of Agriculture and Food's studies into identification of high-quality agricultural land, to protect the economic and agricultural viability of this land.
- The need to protect the economic viability of the rural land use generally.
- The need to preserve the rural character and a rural appearance of the area.
- The need to ensure that the existing standard of roads, water and electricity supply and other services is sufficient for the additional demands that the proposed development would create.
- The need to consider the existence of basic raw materials, mineral resources and the impact of the proposal on existing and potential extractive industry operations in the area.

As the proposal is for an incidental land use to support the primary land use and existing grain stockpiling facility on the same lot, it is considered that the objectives of the rural zone have not been compromised by the proposed development. The proposed addition is incidental to an

approved stockpiling land use which only aids to support the agriculture and primary production industry meaning the proposal does not compromise the objectives of the rural zone and warrants approval accordingly.

Site and Development Requirements

Clause 3.11.2 of LPS 1 details minimum site and development requirements for the 'Rural' zone.

The minimum primary street setback is 20 metres, and the minimum side and rear boundary setback is 10 metres. Although setbacks are not specifically annotated on the plans, it is clear from the size of the landholding and the position of the proposed storage compound that the development achieves the minimum front, side and rear boundary setbacks outlined in LPS1.

The maximum building height standards are not applicable as there is no residential development proposed.

It is considered that the proposed the addition of the 'warehouse/storage' land use for the dangerous goods storage compound will have no detrimental impact on the amenity of the locality and is therefore able to be supported.

Parking Requirements

Schedule 5 of LPS1 outlines parking requirements for various use class categories. The minimum number of parking spaces required for 'warehouse/storage' land use is based on a ratio of 1 bay per 50m². Based on the concrete pad size of 23m x 22m, the floor area of the dangerous good storage compound is 506m², which means the proposed development should provide 10 parking spaces.

Whilst there are no formal parking bays marked on the plans, based on a typical bay width of 2.4m, there is adequate space to park approximately 10 vehicles in the gravel area around the pest control shed (5 in the front, and 5 overflow bays at the rear) (as per the below mark-up). There can be no parking within 15m of the dangerous goods storage compound, which is why parking is only shown around the pest control shed.

In practice, it is anticipated that between 2 to 4 grain protection staff will drive to the compound each day to get access to the grain protection trucks and other resources stored in the compound. The minimum scheme requirement to provide 10 parking spaces is in excess of the parking demand the compound will generate and there is adequate room for 2 to 4 grain protection staff to park their cars on site.

There is not requirement to provide bicycle parking. No bicycle parking is proposed as staff will drive to site.

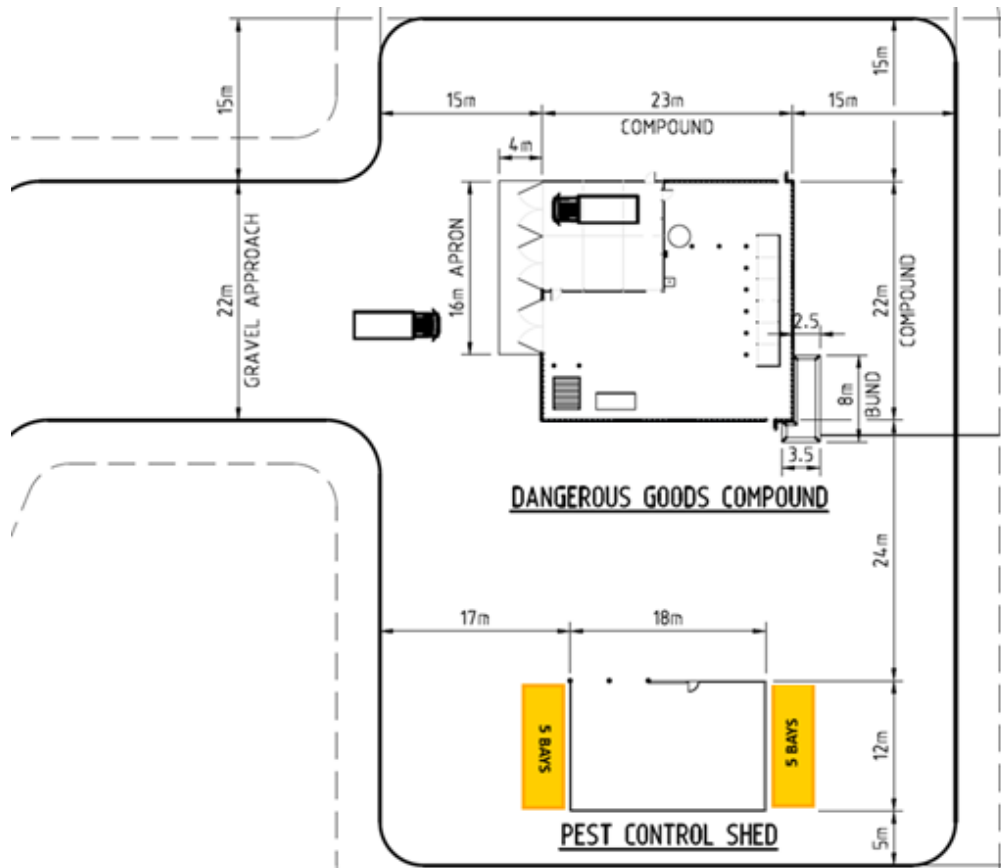


Figure 2 - Proposed Parking Layout

City of Greater Geraldton Local Planning Strategy

The City of Greater Geraldton Local Planning Strategy outlines a desire to protect rural land from incompatible land uses. The CBH facility at Narngulu can only be considered a compatible rural land use as it provides a service that supports the local agricultural and primary production industry which is largely concentrated to rural zoned land. The proposed 'warehouse/storage' land use is incidental to, and in support of, the primary grain stockpiling use at the site and therefore is also compatible with the rural zoned land.

State Planning Policy 2.5 - Rural Planning

The proposed storage compound is consistent with State Planning Policy 2.5 'Rural Planning', which seeks to support existing primary production industries. CBH is an organisation owned and operated by its members, who are local growers that make a significant contribution to the primary production industry.

The proposed dangerous goods storage compound allows CBH to provide a service that supports the primary production industry. All grain that is stored in the network must be adequately treated and protected to meet the phytosanitary requirements of the countries CBH exports its grain to. The proposed compound provides convenient access to physical infrastructure, equipment and materials (e.g. fumigants) needed for that grain protection function.

OTHER CONSIDERATIONS

Stormwater Management

The natural terrain has a series of small ridges grading towards isolated low points within the CBH site at grades typically between 0.5% to 3%. CBH Narngulu site falls away from high points of 24m and 22m AHD along the Arthur Road boundary to isolated low points of 19.5m and 20m, plus the existing basin at 18.29m AHD.

Due to the natural terrain being higher towards Arthur Road and sloping away from the road, there is very low risk of any stormwater run off from the development draining into the road reserve.

The proposed development will include a series of open cut drains to capture runoff from the storage compound site and direct it into the existing drainage system towards the existing drainage basin on Lot 15. Our stormwater consultant, Shawmac, have confirmed that the existing basin has capacity to receive additional runoff.

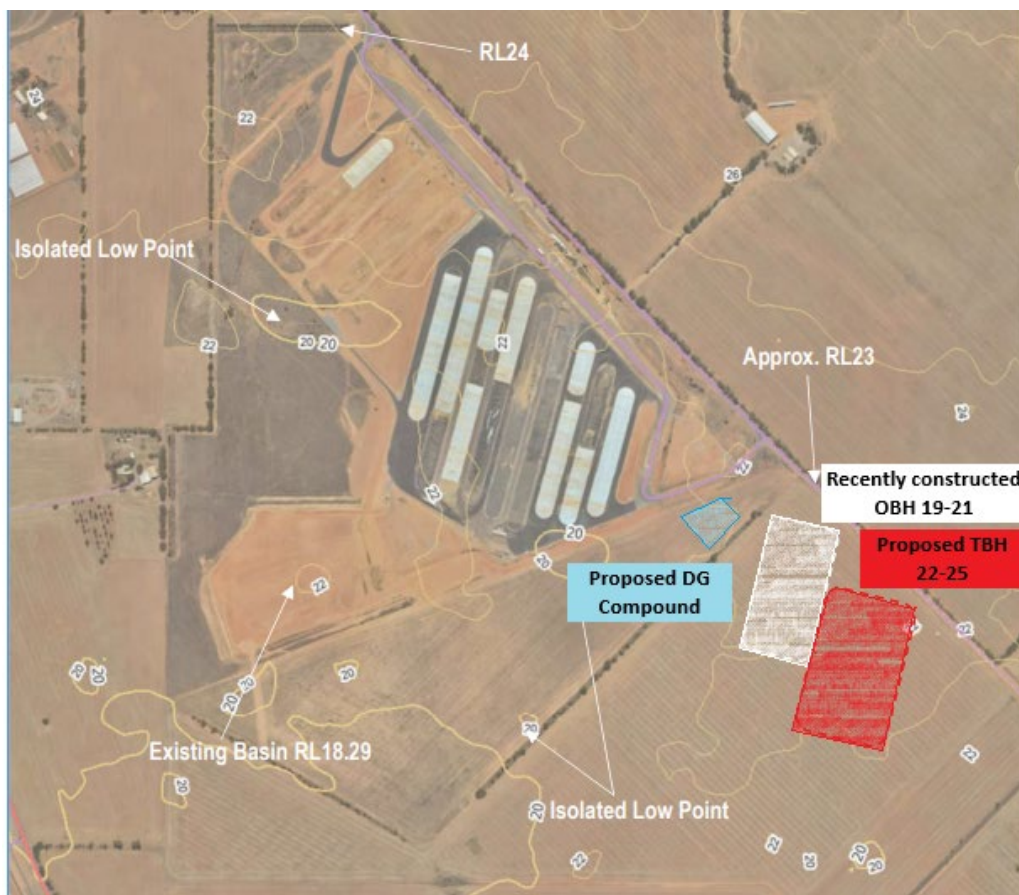


Figure 3 - Natural Topography

Traffic

As outlined in the earlier sections of this report, the majority of daily trips to the dangerous goods storage compound will be grain protection staff who need access to the stored equipment and materials. Outlined below are the anticipated vehicle movements for the development.

AM:

- Two to four staff will drive to site and park their cars (approx. 4 vehicle movements).
- Staff will leave site in a grain protection truck to visit grain receival sites in the Geraldton zone (approx. 2 vehicle movements).

<10 vehicle movements during morning peak.

PM:

- Grain protection truck(s) will return to site to be stored overnight in the parking shelter (approx. 2 vehicle movements).
- Two to four staff will leave site in their cars (approx. 4 vehicle movements).

<10 vehicle movements during afternoon peak.

According to the WAPC Transport Impact Assessment Guidelines, a development is considered to have a 'low impact' when it generates less than 10 vehicle tips during peak hour. As outlined above, the proposed dangerous good storage compound is anticipated to have a low impact. Even if some vehicles visit site above what is anticipated for day-to-day activities, the number of during peak hour vehicle movements will still be below the threshold for low impact.

The Guidelines outline that the level of assessment required for a 'low impact' development is a brief description of the land use and proposed development to establish the impact as low, which is provided above. A 'low impact' development is not required to provide a traffic assessment or report.

Bushfire

As per the Department of Fire and Emergency Services Map of Bushfire Prone Areas, the CBH Narngulu site is not identified as a bushfire prone area and is therefore not required to provide any bushfire assessments or management reporting.



Figure 4 - DFES Maps of Bushfire Prone Areas extract

CONCLUSION

The proposed dangerous goods storage compound is aligned with the relevant planning framework for the subject site and is not considered to result in any new amenity impacts to the surrounding area. CBH respectfully requests that the Application for Development Approval is considered by the City of Greater Geraldton expeditiously given the straightforward nature of the application, and its general compliance with the City's planning framework.

Yours sincerely

FOR: Cooperative Bulk Handling Limited