



DEVELOPMENT APPLICATION REPORT



Proposed 'Stockpiling' (Grain)



Lot 15 Arthur Road, Narngulu



8 January 2019

DOCUMENT REFERENCES

Address: Lot 15 Arthur Road, Narngulu
Local Government: City of Greater Geraldton
Description: Stockpiling of grain
Client: Cooperative Bulk Handling Limited (CBH)
Reference: ARTH15

VERSION CONTROL

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1.0	Draft for review	K Jackson	8 January 2019
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1. EXECUTIVE SUMMARY

WA Planning and Logistics Pty Ltd provides the following report based on information provided by CBH for the purpose of lodging a development application for 'stockpiling' upon Lot 15 Arthur Road, Narngulu.

The proposal ultimately seeks the approval of a stockpiling facility for the storage of up to 180,000 tonne of grain. This will include the construction of four (4) open bulkheads for the storage of grain, sampling facility, weighbridge facility and staff amenities.

There is an existing facility upon the site that already has approval for the storage of 180,000 tonne of grain. It is intended that on completion of the construction of the proposed facility, that this existing facility would be removed from the site.

Therefore this application is not for additional storage capacity, but to relocate the grain storage area to an alternative location upon the site in order to improve internal access so that it enables the installation of the weighbridge and sampling facilities in the most efficient locations.

This report seeks to provide a comprehensive overview of the proposed facility and outline how the site and is intended to be managed.

Technical documentation and plans has been provided to provide further information and support to the proposal and includes the following:

- Plans outlining the proposed site layout and construction details of each element of the proposal including:
 - Conceptual Layout (2018-307-1071)
 - Estimating Plan (2018-307-0070)
 - Staff Lunchroom Building
 - Staff Shower Building
 - Staff Toilet Building
 - Weighbridge Hut
 - Weighbridge Details
 - Sampling Hut
 - Belt Conveyor plans
 - Open Bulkhead plans
- Noise Management Plan
- Dust Management Plan (construction activities)
- Dust Management Plan (operational activities)
- Grain Protection Officers Manual
- Traffic Impact Assessment Report
- Stormwater Report

2. BACKGROUND

2.1 Location

The property is located approximately 14.5km from the Geraldton Townsite and Geraldton Port and approximately 2km to the south-east of the Narngulu Industrial area. The Geraldton Regional Prison is located 1km to the West and the Geraldton Airport 2km to the north.

The lot sits at the transition of industrial zoned land to rural zoned land that extends out to the east. The property is surrounded by 'a mixture of land uses. On the corner of Arthur Road in close proximity to the property there is a livestock sale yard and race track. Majority of lots are being used for largely broad-acre agricultural activities including crop production, livestock operations and lifestyle hobby farms.

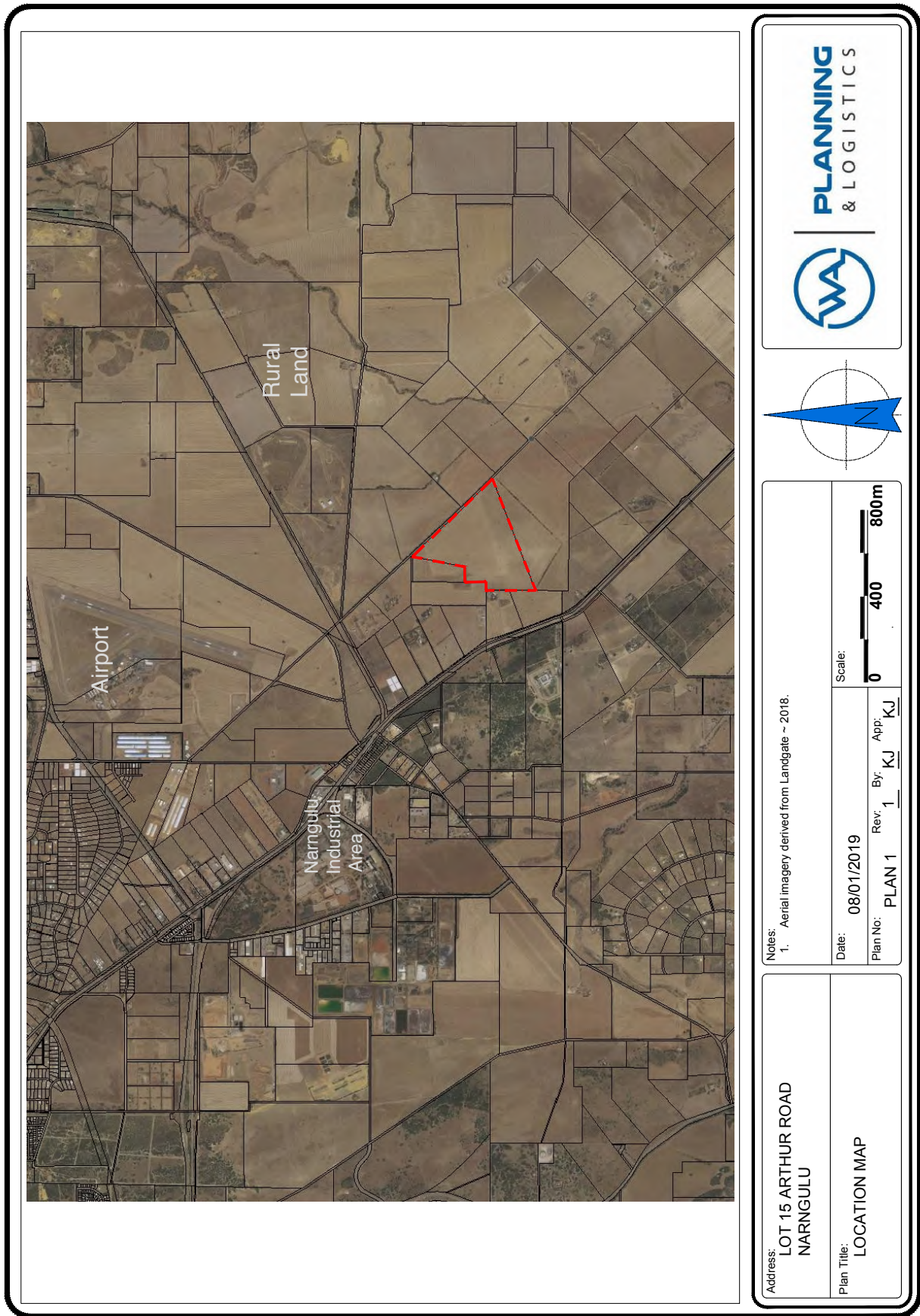
Some surrounding properties produce grain crops, the product of which is proposed to be stockpiled upon the site.

A location plan has been included as Figure 2 to this report.

Figure 1: Aerial photograph of site during construction of existing facility



Figure 2: Location Plan



2.2 Existing Development

Stockpiling is an existing land use upon the site which was approved by the City of Greater Geraldton on 9 September 2014 with construction completed in 2017.

The site currently contains 6 open bulkheads with a maximum storage capacity of 180,000 tonne. There are two bitumen sealed crossovers providing separate entry and exits to the property with compacted gravel access ways within the site. An existing drainage basin is located to the west of the bulkheads for the collection of stormwater and drainage for the site.

Figure 3: Existing development



2.3 Land Tenure

The property is owned and operated by Cooperative Bulk Handling Limited (CBH).

CBH will be responsible for undertaking any subsequent approvals required under legislation and to meet the conditions of approval applied by the City of Greater Geraldton through the planning process.

Contact details for this proposal can be addressed to:

Contact: Tim Dolling
Email: tim.dolling@cbh.com.au
Phone: 08 9216 6094
Website: www.cbh.com.au

Queries in relation to ongoing operations:

Contact: Site Manager – Cory Foot
Email: cory.foot@cbh.com.au
Phone: 0417 726 001

2.4 About CBH

The CBH Group was founded during the Great Depression through the realisation that a cheap and efficient bulk handling system would reduce growers' costs and strengthen the struggling grain industry.

The CBH Group is Australia's largest co-operative and a leader in the Australian grain industry, with operations extending along the value chain from grain storage, handling, transport, marketing and processing. Its storage and handling system currently receives and exports around 90 per cent of the Western Australian grain harvest to more than over 20 countries including Japan, South Korea, Indonesia, Iran, Pakistan and China.

Today the CBH Group has around 4,200 grower members and is the only major participant in the Australian grain industry owned by growers. It has 197 sites across Western Australia, four ports and investments in trains and flour mills creating an integrated supply chain.

Since being established in Western Australia in 1933, CBH has continuously evolved, innovated and grown. The CBH Group aims to create and return value to growers. To support this purpose, the co-operatives values are:

- ⇒ The strength of many to succeed
- ⇒ The commitment to perform
- ⇒ The courage to change

As an organisation we strive for continuous improvement in our practices and behaviours. For more information please visit www.cbh.com.au



3. PROPOSAL DETAILS

3.1 Overview

The proposal ultimately seeks the approval of a stockpiling facility for the storage of up to 180,000 tonne of grain. This will include the construction of four (4) open bulkheads for the storage of grain, sampling facility, weighbridge facility and staff amenities.

There is an existing facility upon the site that already has approval for the storage of 180,000 tonne of grain. It is intended that on completion of the construction of the proposed facility, that this existing facility would be removed from the site.

Therefore this application is not for additional storage capacity, but to relocate the grain storage area to an alternative location upon the site in order to improve internal access so that it enables the installation of the weighbridge and sampling facilities in the most efficient locations.

The site will receive grain from local producers which will be stockpiled onsite until time of purchase. This is strategically undertaken to obtain the best price for producers based on the supply and demand movements that occur for grain product.

Once grain is purchased trucks will be used to move grain from the site to its final destination. As much of the grain is exported to other countries, trucks will be used to transport grain to the Geraldton port to be loaded onto ships.

A full copy of the development plans and accompanying information for this proposal has been included separately to this report and includes:

- Plans outlining the proposed site layout and construction details of each element of the proposal including:
 - Conceptual Layout (2018-307-1071)
 - Estimating Plan (2018-307-0070)
 - Staff Lunchroom Building
 - Staff Shower Building
 - Staff Toilet Building
 - Weighbridge Hut
 - Weighbridge Details
 - Sampling Hut
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 - Open Bulkhead plans
- Noise Management Plan
- Dust Management Plan (construction activities)
- Dust Management Plan (operational activities)
- Grain Protection Officers Manual
- Traffic Impact Assessment Report
- Stormwater Report

3.2 Built Development

Built development is proposed to include:

1. *Four (4) open bulkheads with a maximum storage capacity of 180,000 tonne*
Each bulkhead is 375m long and 35m wide with a storage capacity of 45,000 tonne.
Constructed with 1.8m high wall frames on sealed pads covered with tarpaulins once filled with grain. Two (2) hopper pits and ground conveyors in between each pair of open bulkheads.
2. *Staff Amenities*
Lunch room with kitchenette and seating
Shower building with 1 female and 1 male cubicle.
Toilet building with 2 female cubicles, 2 male cubicles and 1 unisex disabled toilet.
22 carparking bays
3. *Sampling Facility*
Dedicated grain sampling building/platform with two sampling spears
4. *Weighbridge Facility*
240 tonne 54m weighbridge and associated weighbridge hut building

The crossover for entry into the site will remain in the same location in the north-east corner of the lot. A new 'exit' crossover is to be constructed at the south-east corner of the property to the requirements of the local government. All accessways and crossovers are to be constructed to an all-weather seal (bitumen) standard with signage installed as required. Stormwater for the site will be directed into the existing drainage basin.

3.3 Operating Hours

During peak operations (October – January) the site will be operated between 6am and 10pm, 7 days a week. Majority of incoming grain activity is undertaken during daylight hours.

During general operations (February to September) the site will be operated between 6am and 10pm, 6 days a week (Monday to Saturday) and will be for out-loading activities only as required.

3.4 Workforce

Peak Period (October to January)

- Up to 15 staff would work on site during harvest grain receivals up to 7 days a week
- The 15 staff can work across 2 x 8 hour shifts between 6am and 10pm. Less staff would work a 1 x 12 hour shift during weekends
- Between 6-10 staff would be onsite at any one time.

General Period (February to September)

- Up to 5 staff would work on site during the out-loading of grain for up to 6 days a week

Other staff will also be on site intermittently around harvest grain receivals and out-loading to undertake fumigation, pest control and maintenance activities.

3.5 Timing

Construction of the new facility will be undertaken in one stage and will commence on receipt of the necessary approvals from the City of Greater Geraldton.

It is anticipated that construction would be complete by August 2019 in time to receive grains produced for the 2019/20 harvest season.

3.6 Storage of Fuels & Chemicals

There will be no storage of fuels and chemicals onsite. All chemicals required as part of pest management practices are stored offsite and only bought to site by qualified technicians at the time of use.

3.7 Servicing

The lot is serviced by a reticulated water and electricity supply. The proposed staff amenities will require the installation of an effluent disposal system (septic tanks and leach drains) to the satisfaction of the Local Government to the requirements of the Department of Health.

4. MANAGEMENT MEASURES

Potential impacts arising from the operation of this land use can be managed in such a way as to minimise or eliminate those factors. The following information contains those measures that the company has initiated to provide confidence in its operation to ensure there is no detrimental impact on the surrounding land, land uses or the environment.

4.1 Dust

There are two sources for potential dust emissions associated with the use of the land for stockpiling purposes; dust generated during construction and dust produced during ongoing operations. Dust emissions will be continually monitored to ensure preventative and proactive measures are taken immediately.

Construction

During construction the land upon the site will be disturbed in order to create the new accessways, storage areas and building pads for each element of the proposal. It is suggested that the main sources of dust will be through the removal of topsoil, transportation of materials to and from the site, vehicles movements upon non sealed accessways and stockpiles of materials onsite (if applicable).

Through ongoing monitoring and assessment the Site Supervisor will be responsible to ensure dust emissions are minimised. It is intended that the use of water tankers, soil binding agents and the use of tarpaulins would be the main forms of suppression with an aim to reduce dust emissions by being aware of prevailing weather conditions and providing preventative mitigation measures to dust risk activities.

A Dust Management Plan (Construction Works) has been provided which elaborates on this matter.

Ongoing operations

Once the new facility is established dust emissions will be limited to activities relating to the physical movement of grain within the site. This will occur during the loading and unloading of trucks to shift received grain into and out of the open bulkhead stockpiles.

It is proposed that dust can be adequately managed through the use of measures such as covering stockpiles with tarpaulins, ensuring equipment is being used to designated load limits and ensuring loading and unloading is not undertaken in extreme wind and weather conditions.

The new stockpiling facility will improve potential dust emissions caused by the movement of vehicles, given that the accessways, crossovers and land beneath the open bulkheads will be bitumen sealed.

A Dust Management Plan (Ongoing Operations) has been provided which elaborates on this matter.

4.2 Noise

Noise has the ability to impact those operating on a site, however noise can also impact on those outside of the facility and it is therefore important to reduce the potential for detrimental impact through sound operational practices and mitigation measures.

The noise generated from this site will be noise associated with the movement of trucks within the site and the operation of plant and equipment moving grain to the appropriate storage areas.

The applicant proposes the following actions to assist in the management of noise originating from the excavation area:

- Continue to Implement the company's Noise Management Plan;
- Comply with Environmental Protection (Noise) Regulations 1997;
- Ensure that operations are only carried out within the prescribed working hours/days;
- Provide appropriate PPE to workers;
- Ensure equipment is turned off when not in use;
- Ensure plant and vehicles are maintained in good repair and where possible utilise noise suppression equipment to reduce noise levels where practicable;
- Maintain internal access roads in good condition;
- Ensure transport vehicles do not exceed 20km/hour along internal roads;
- Ensure any noise complaints are followed up promptly;

The nearest sensitive premises (dwellings) are 614m and 990m from the facility and are not expected to experience a noise nuisance. Should a complaint be received CBH have a reporting process to ascertain the nature of the complaint and to ensure that appropriate remedial action is undertaken in accordance with its management procedures and the requirements of the Environmental (Noise) Regulations 1997.

A Noise Management Plan has been provided which elaborates upon this matter.

4.3 Stormwater & Drainage

The City of Greater Geraldton stormwater storage requirements are for the 10-year ARI with storage provided for 31mm of rainfall.

CBH has adopted its own criteria for minimum storage requirements based on storage capacity to cater for 1 in 20 years ARI less the predevelopment flow, with a minimum freeboard of 300mm.

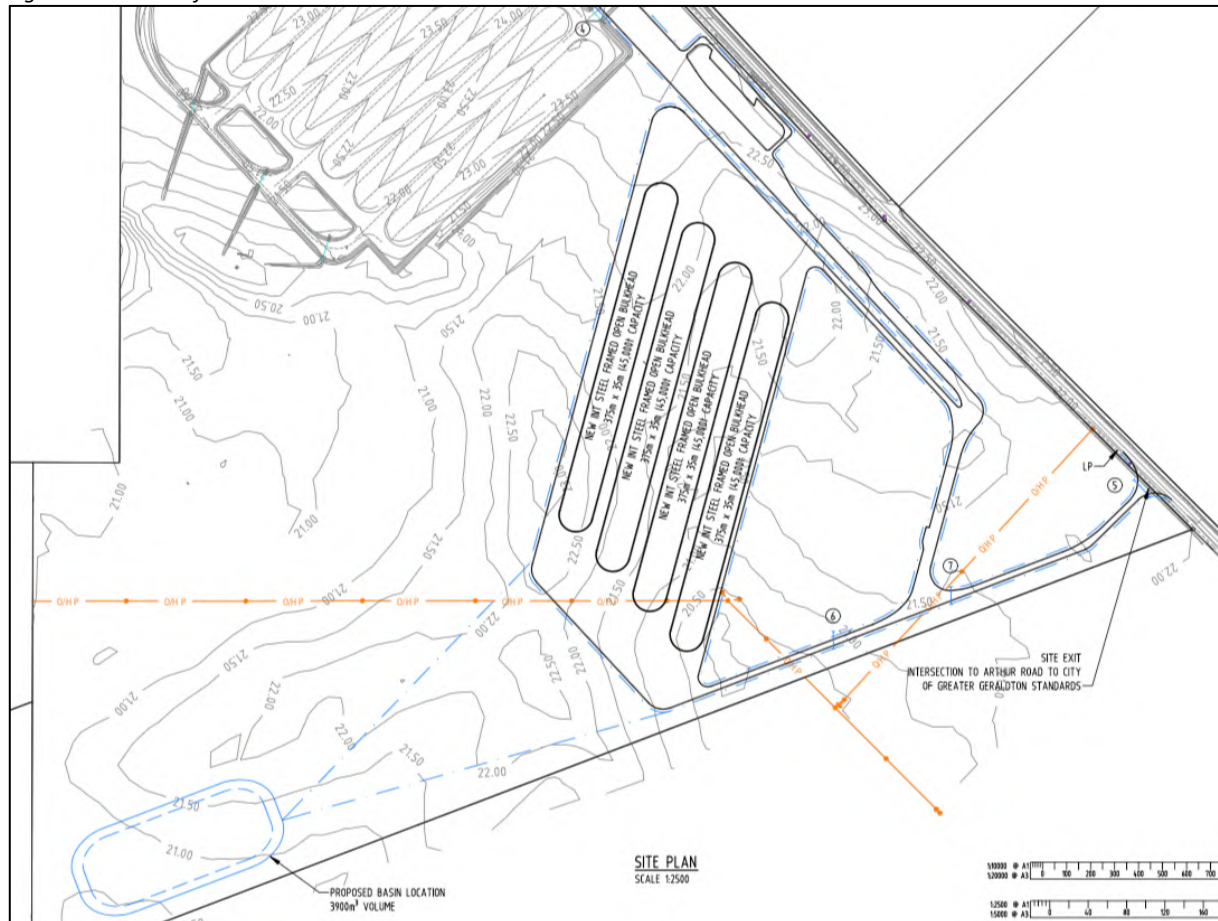
As the CBH requirements for storage are more conservative, this has been used in the calculation of the minimum storage volume.

The proposed facility will have a total impervious area of approximately 13.8 hectares and based on the CBH storage requirements the facility will require a total storage of 3,878m³ with detailed basin design to be based on 3,900m³.

It is proposed that the stormwater would be retained onsite and directed to the new stormwater basin located to the south-west of the proposed open bulkheads through the use of drains and culverts.

A Stormwater Report has been provided which elaborates upon this matter.

Figure 4: Extract from Stormwater Plan



4.4 Grain Protection

The scope of this manual is to give a broad understanding around the Grain Protection procedures and techniques involved in protecting grain from insects, rodents, weeds, damage and contamination.

An important part of site management is the ongoing inspections to ascertain the level of pest infestation upon the site and undertaking mitigation measures to counteract this activity.

Fumigation lines are installed at the base of the open bulk storage heads with grain loaded on top. Once the bulkhead is at capacity the bulkhead is sealed with a tarpaulin and tied down with belly straps to maintain the pressure integrity of the bulkhead. The grain is then fumigated to ensure all pests have been controlled. Should rodents be present onsite the use of bait traps is undertaken to control activity.

The management of the land surrounding the open bulk heads is important in ensuring that there is no contamination of the grain being stored. The surrounding land contains grasses that will be managed by mechanical and grazing methods with a spraying program undertaken to control the area for a variety of weed species as relevant to the site.

No chemicals are stored upon the site, with all chemicals bought to site and administered by qualified technicians as required.

See Grain Protection Officers Manual for further information.

4.5 Traffic Management

Access & Crossovers

A Transport Impact Assessment Report has been undertaken for the proposal with calculations of the proposed activity and use of Arthur road assessed to be suitable. It provides confirmation that the proposed crossover locations and Arthur Road pavement (7m nominal seal, 9m formation width) are appropriate for the proposed stockpiling land use subject to the implementation of the recommended upgrades of the Report and per the local governments requirements.

In accordance with the Traffic Impact Assessment undertaken for the proposal the following measures will be undertaken to ensure safe and legible access/egress in relation to the site and ensure that there is no conflict with turning vehicles and opposing traffic:

- Upgrade to the existing northern crossover and designation as an entry access only.
- Closure of the existing central crossover
- Construction of a new southern crossover and designation as an exit access only.
- Road widening works within the Arthur Road reserve as per the requirements of the local government

Speed

There is no designated speed zone along Arthur Road at the proposed CBH entry and exit points. The road is classified as de restricted speed zone, accordingly road users require to drive to a safe speed in line with the actual condition of the road.

In terms of the proposed CBH internal road system, the speed zone for all vehicles will be posted at 20Km/Hr, with a reduction to 5Km/Hr within the grain unloading and weighbridge area.

Signage

Advanced warning signage, speed limits, directional signages is to be installed to the requirements of the location government. It has been identified that advanced warning signage would be beneficial along the Arthur Road Reserve warning users of turning truck movements in the area.

A Transport Impact Assessment Report has been provided which elaborates upon this matter.

4.6 Visual Management

The visual amenity of a development can come into focus for a number of key factors that this report will discuss:

- Development being located at an elevation that can be seen
- Close proximity to neighbouring properties and/or dwellings;
- Lack of visual screening

The proposed stockpiling facility area will be relocated upon the site which will provide a separation of 614m and 990m from the nearest dwellings. In relation to those dwellings there is limited visibility through to the proposed site, and at some distance (minimum of 614m) and through existing vegetation upon the dwelling sites. Therefore existing topography, landscaping and separation distance will adequately screen this proposal from those habitable structures.

Whilst the development will be clearly visible along Arthur Road and from adjoining property boundaries it is considered that this is an incidental rural land use and one that fits well into the rural character of the

area. Its general visibility to passers-by and from within adjoining broadacre paddocks is not considered detrimental to the amenity or appearance of the area.

It is also noted that the stockpiles are to be covered with tarpaulins and are of a built form that blends with the flat rural landscape surrounding. The below image demonstrates that although large in size, the bulkheads blend well in its context.

Figure 5: View of existing storage facility from southern boundary of lot



In assessing the visual impact of the operations, the applicant also proposes the following additional actions to manage visual impacts from neighbouring properties and roads:

- Ensure the areas of land that will not be used as part of the stockpiling operations are maintained through grazing and mechanical methods and that preventative weed control is undertaken periodically throughout the year;
- Maintain the site in a clean and orderly manner;
- Clean any spills immediately on the local road network;
- Store any plant and equipment out of sight; &
- Ensure that the security fencing, signage and gates are of a design and scale that is in keeping with the area.

4.7 Safety

With the commitment to maintain and continually improve their working environment and business processes, CBH has received accreditation from Quality Control Services for meeting the following ISO International Standards:

- ISO 9001 – Quality Certified Systems
- ISO 14001 – Environmental Certified System

This certification demonstrates that CBH operates to the highest of standards in Safety Management, Environmental Management and Business Systems Management. For more information on this accreditation please visit <https://cbh.com.au/about-cbh/certifications>.

CBH will ensure that all workers are inducted into the operational procedures and that they understand the environmental and safety implications of the site. Where applicable workers will undertake a Job Safety Analysis or Risk Assessment to ensure appropriate controls are put in place to minimise risks.

4.8 Environment

The Environmental Protection Act 1986 is the principal legislation for the prevention, control and abatement of pollution and environmental harm, the regulation of clearing, and the conservation, preservation, protection, enhancement and management of the environment. Clearing of native vegetation is an offence unless a clearing permit has been granted or an exemption applies.

Furthermore under Section 51B of the Environmental Protection Act, the Minister for Environment may declare a specified area to be an 'environmentally sensitive area (ESA)'. A search of Department of Environment Regulation (DER) records indicates that this property and the remnant vegetation is not within an environmentally sensitive area.

As the clearing for the purpose of constructing the new facility will be confined to the removal of grass species vegetation only and the land not containing an ESA no clearing permit is required.

These typical grass species are not of conservation significance. They are not a Threatened Ecological Community or Priority Ecological Community, nor does it contain any Threatened Flora or Priority Flora species. The vegetation is not of local significance.

There is no landscaping or revegetation proposed within the development area.

4.9 Heritage

There are no known heritage implications associated with the proposed application site. A search of the Department of Aboriginal Affairs Aboriginal Heritage Inquiry System demonstrated no Registered Sites or other heritage applications at this time.

The applicant acknowledges the requirements of the Aboriginal Heritage Due Diligence Guidelines and will use these guidelines to assist them with planning and considering Aboriginal Heritage in relation to the proposed works.

5. PLANNING FRAMEWORK

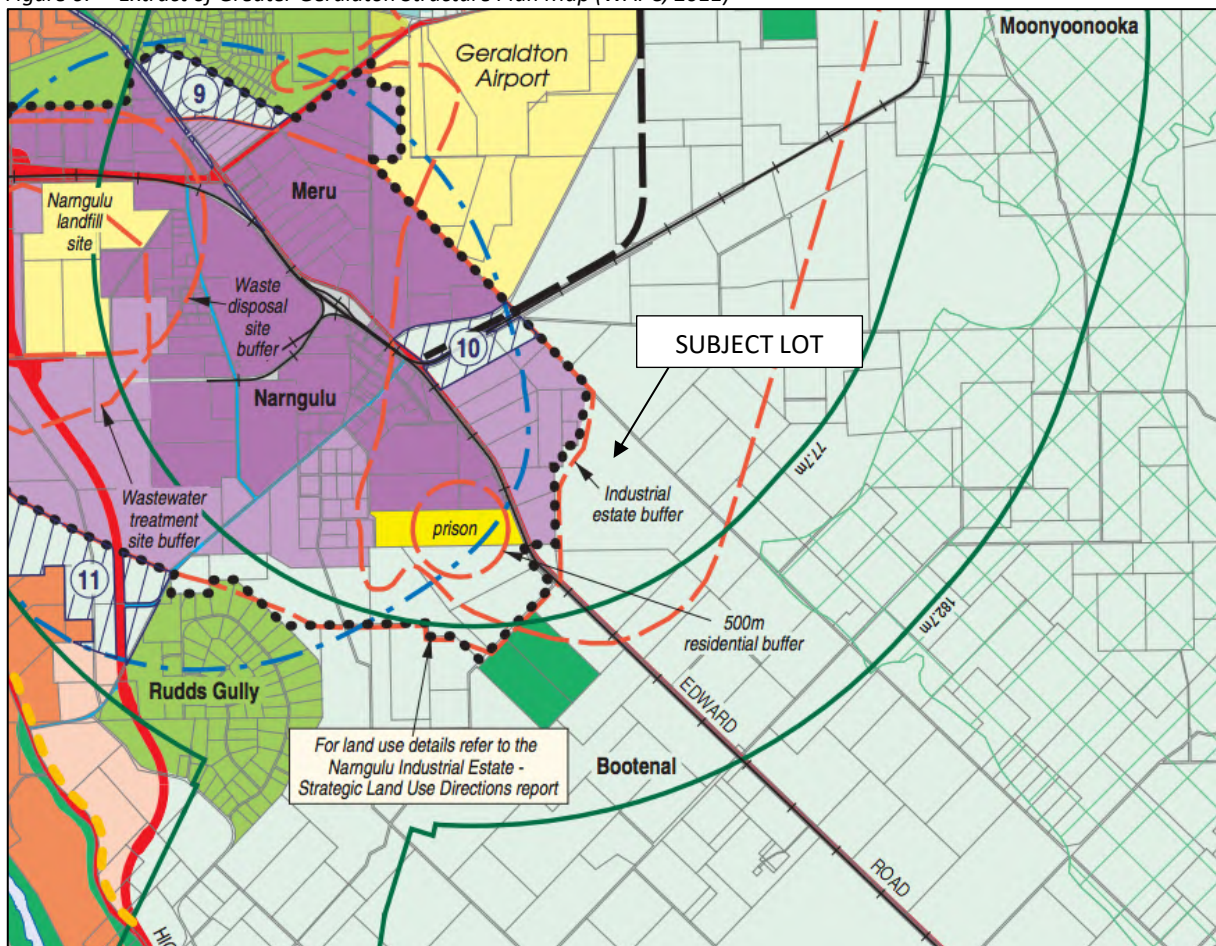
5.1 Geraldton Region Plan & Greater Geraldton Structure Plan (2011)

The Geraldton Region Plan was adopted by the Western Australian Planning Commission in 1999 to provide a regional framework to guide strategic planning and development decisions within the region. The Geraldton Region Plan incorporated a detailed Greater Geraldton Structure Plan.

The Plan recognises that the greater Geraldton area is the focus of commercial and administrative activity for the Mid-West Region and, as such, aims to provide a framework for coordinating development and managing growth of the regional centre. The Structure Plan relating to this document was reviewed and updated in 2011 and is to be read in conjunction with the Greater Geraldton Structure Plan 1999.

The Greater Geraldton Structure Plan (WAPC, 2011) identifies the property within a 'Rural' area and inside the 'Geraldton Airport Inner Buffer'. This aligns with the City's Local Planning Scheme and Strategy in relation to the intention of protecting this lot as 'rural' zoned land. Further discussion on the location of the property within the airport buffer will be discussed below.

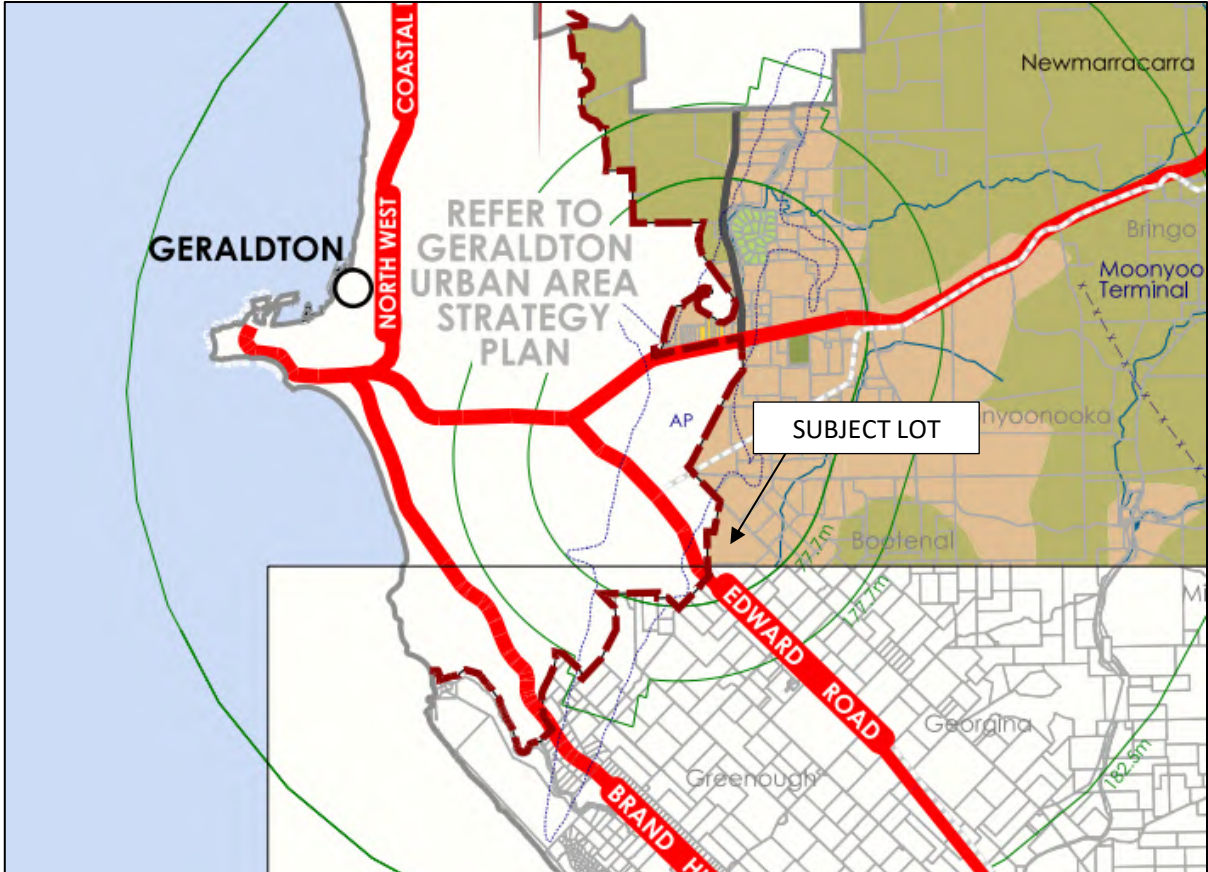
Figure 6: Extract of Greater Geraldton Structure Plan Map (WAPC, 2011)



5.2 City of Greater Geraldton Local Planning Strategy (2015)

The subject lot is located within an area indicated as 'Higher Versatility Agricultural Land'. The Strategy states that it has the desire to "protect higher versatility agricultural land from incompatible development (predominately urban or rural living encroachment)" (DPLH, 2015, p.19) and that identification of these areas "reinforces the significance of the land to the agricultural sector, where the challenge is how to set aside the most productive and versatile areas of agricultural land for long-term food security to meet the needs of projected global, national and state population growth" (DPLH, 2015, p.20).

Figure 7: Extract of Rural Land Strategy Plan Map (DPLH, 2015)

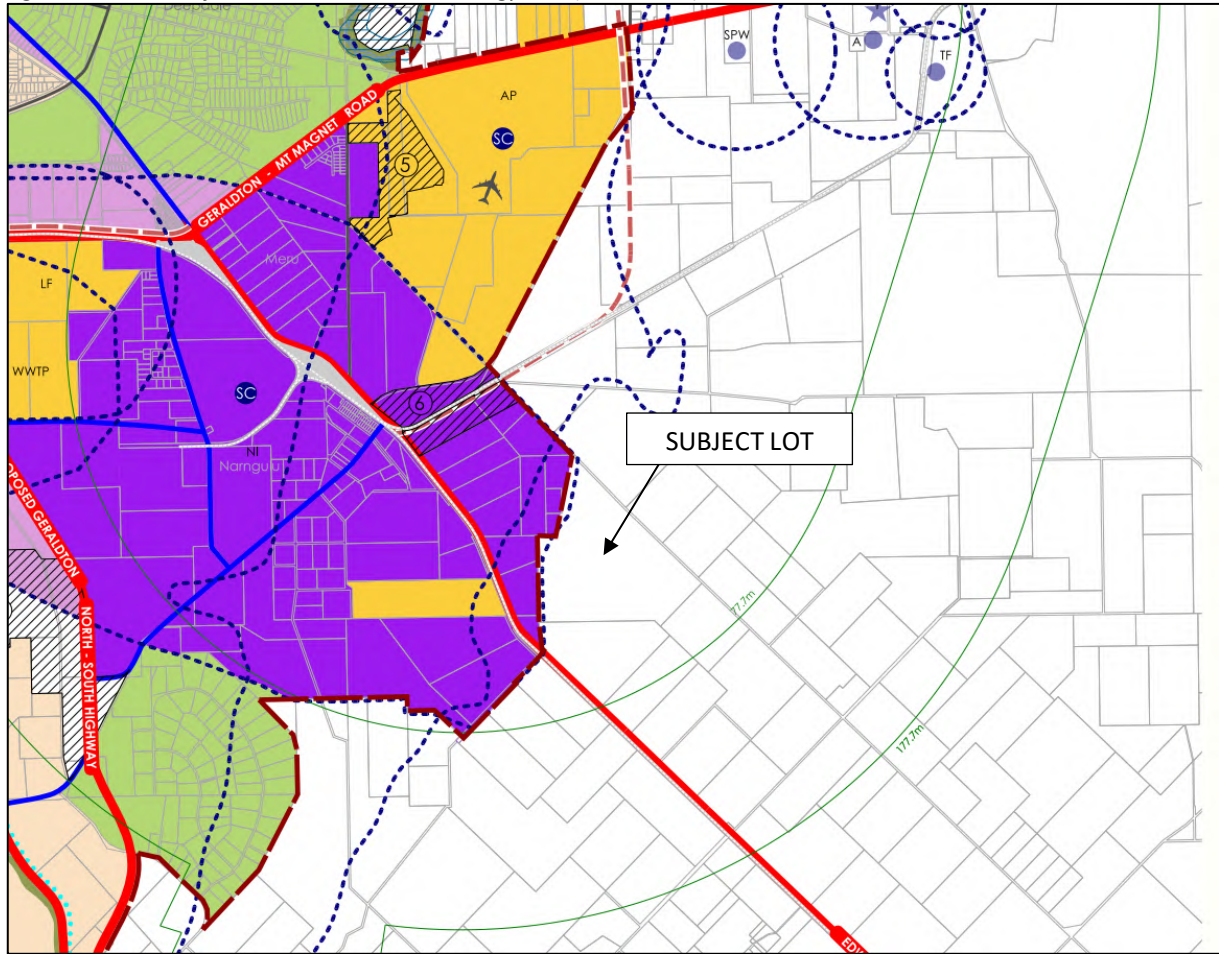


Within the Strategy's 'Rural Land – Strategies and Actions' there is a clear intent that Rural land is to be protected and that any proposed uses are to be compatible and incidental to those permitted within the 'Rural' zone.

The stockpiling of grain is considered an appropriate land use to be located within the 'rural' zone given its complete reliance on the broad acre agricultural land use of grain production. This makes stockpiling for the purpose of grain storage a necessary and expected land use within a rural area as it is an integral and logistical part of the grain production sector.

It is considered that strategically the lot is well placed for this land use given that 'Stockpiling' is a use that is only permitted to be considered within the 'Rural' and 'General Industrial' zones. This lot is placed within the 'Rural Zone' and as per the Strategy will be directly adjoining proposed 'General Industrial' zoned land to the west. The proposed management of the site will ensure that the use will not cause nuisance or produce emissions that will affect the ability of surrounding land to be utilised to its full extent.

Figure 8: Extract of Geraldton Urban Area Strategy Plan (DPLH, 2015)



5.3 City of Greater Geraldton Local Planning Scheme No.1 (2016)

Land Use & Permissibility

The site is zoned 'Rural' under City of Greater Geraldton Local Planning Scheme No.1 (the 'Scheme').

The proposed grain storage activities is considered to fall under the land use class of 'Stockpiling' which is defined as:

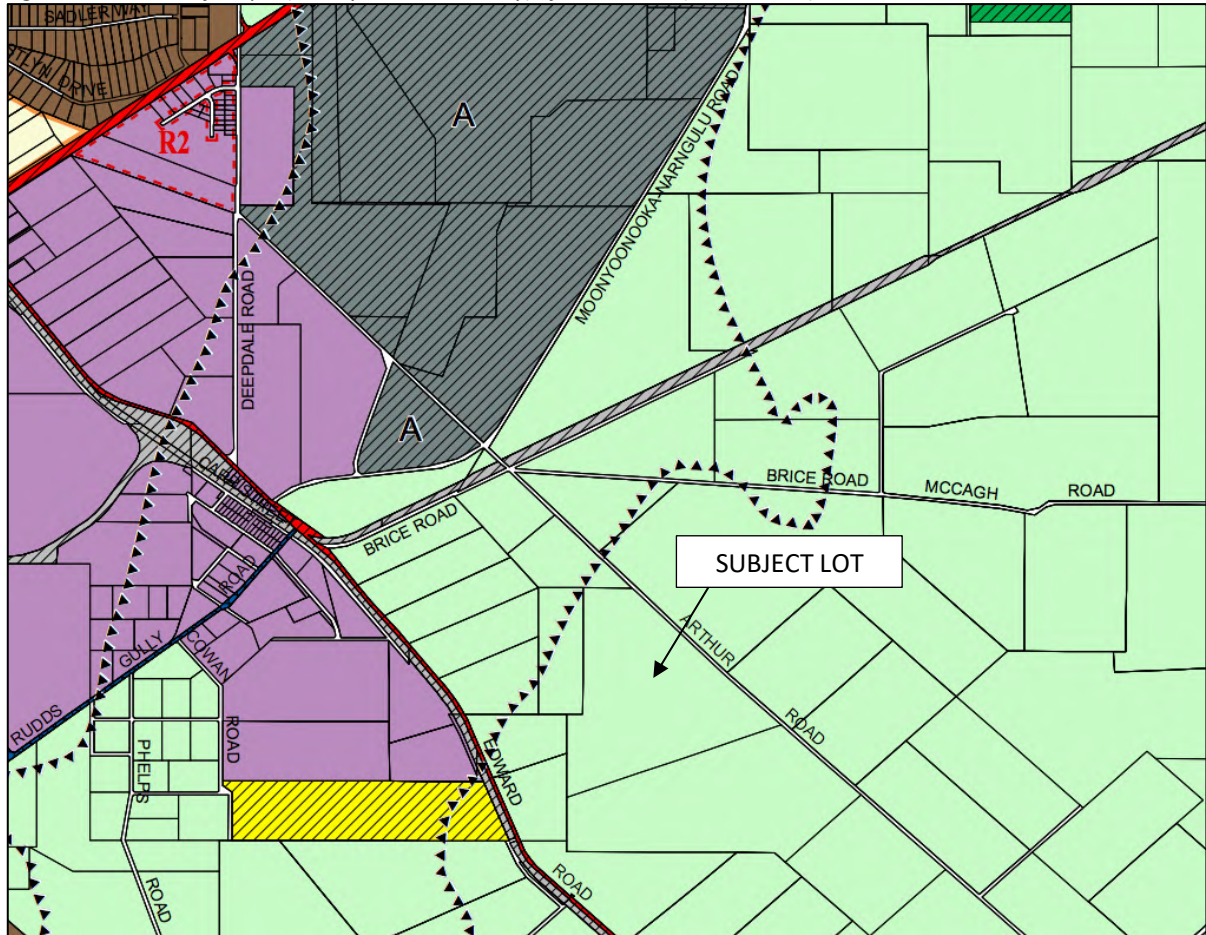
"stockpiling - means the temporary storage of raw or manufactured materials for a given purpose in an enclosed or an open environment."

Stockpiling is a 'A' use meaning that the use must be advertised prior to potential approval by the local government.

The property is located just outside of Special Control Area 3 'Geraldton Airport'. The proposed use will not affect the obstacle height limitation surface area and it not of a nature that would produce emissions such as dust or light that would affect aircraft or use of the airport facility.

'Stockpiling' is a land use that can only be considered upon 'Rural' or 'General Industry' zoned land. It is considered that the location of stockpiling upon this property is appropriate given it is on the boundary between 'Rural' zoned land and land that has been earmarked for future rezoning to 'General Industrial'. As it can achieve the recommended buffer distances and is to be constructed and managed to minimise potential emissions it is considered that it is a suitable land use and location for the site.

Figure 9: Extract of Map 6 (Moonyoonooka Locality) of the Scheme (WAPC, 2016)



Objectives

The Scheme lists the following objectives for the ‘Rural’ zone:

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

The storage of grain within a rural area is not only common place but necessary for the efficient and effective storage of grain being produced within the catchment area. To reduce the cost of transport for growers, it is important that stockpiling be undertaken strategically to maximise and achieve a balance between accessible locations for growers and ongoing transport costs from the storage area to the end customer whether this by truck or transport to a port for exporting internationally.

It is considered that the location of this stockpiling facility achieves this balance and provides local growers a sufficiently located facility to cart their grain to during harvest. This is a land use that facilitates and supports grain growing general agricultural activities and we would consider this to be an incidental rural

land use. It is a necessary part of the supply chain for grain growers and therefore a necessary part of rural activity.

The land use has been existing upon the site and has proven to be located upon land that is well suited to the activity and with the improvement in facilities (bitumen sealed access and hard stand areas, sampling and weighbridge) this will only serve to increase the facilities ability to serve the local grain farming community.

Specific Considerations

Section 3.11.2.3 of the Scheme states that the following matters should be considered in relation to development applications upon 'Rural' zoned land:

- "In considering development applications the local government shall have regard to:*
- (a) 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.*
 - (b) the need to protect the economic viability of the rural land use generally.*
 - (c) the need to preserve the rural character and a rural appearance of the area.*
 - (d) 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."*

It is most important to note that the stockpiling land use is one that sincerely recognises the importance of the continuation and viability of broad acre grain production. Its very existence and ongoing operation is absolutely dependent on the continued success of the industry.

This land use supports and stockpiles the produce of an agricultural activity and therefore is a suitable and accepted activity within a rural area. Most broadacre grain farming areas have a stockpiling facility and therefore its presence is not unusual or out of place within its rural context.

The proposed development will improve the current land use activity by provide additional services to the growers utilising the facility. It is also considered that the use of bitumen sealed accessways and hard stand areas coupled with some road improvements within the Arthur Road Reserve for the areas adjacent the proposed crossovers will provide for a quality development that will meet with the necessary legislative requirements as well as bring great community benefit and local employment.

Setbacks

The Scheme requires a primary setback of 20m, side setback of 10m and a rear boundary setback of 10m. The new facility proposed to locate its staff amenities 20m from the front property boundary. The open bulkheads are located 140m from the north-east boundary (front), 68m from the south-east (side) boundary, 461m to the south-west (rear) boundary.

Setbacks are compliant with the requirements of the Scheme.

Parking Requirements

Schedule 5 sets out the required ratio of parking requirements for certain land use categories. As 'Stockpiling' is not specifically listed parking requirements are to be determined by the local government.

The site plan demonstrates 22 carparking bays that are to be constructed to a bitumen standard, line marked and provide with appropriate stormwater drainage. 20 of the angled bays will be of a standard dimension (2.4m x 5.4m) with 2 disabled bays provided with adjoining shared area and required line marking and bollarding.

All parking will be installed to the requirements of AS2890.1:2004 Parking Facilities and to the satisfaction of the local government.

It is considered that the allocated 22 carparking bays can be afforded support by the local government as:

- the maximum number of staff onsite utilising the parking bays would be up to 10 staff at any one time;
- 12 parking bays would be available for visitors to the site (including two disabled bays)
- within Schedule 5 it is generally specified that where buildings are not the dominant infrastructure upon the land, generally the parking ratio is based on maximum number of staff onsite at any one time. The 22 parking bays provided therefore complies with this provision.
- The car parking bays are to be permanently arranged being constructed to a sealed standard and appropriately drained and line marked.
- Apart from staff, others attending the site are predominately driving large trucks and trailers and therefore will park within the allocated truck marshal area.

Landscaping

It is considered that given the scale of the property and its 'rural' zoning that landscaping would appear out of place in the agricultural landscape and an unnecessary use of water resources. The eastern side of the Arthur Road reserve is lined with mature trees which provides for an aesthetic road way whilst still providing for wide open views which will ensure that traffic movements will be cleared sighted. The site is not open to the public and does not provide any office space or outdoor spaces for recreation.

5.4 Geraldton Airport Master Plan 2012-2030

The Geraldton Airport Master Plan establishes the strategic development framework for the Geraldton Airport to ensure that the Airport is developed with the infrastructure and facilities needed to enable and support the growth in aviation activity that will accompany rapid regional economic development and population growth.

Relevant to this application is the mapping of the Obstacle Limitation Surfaces (OLS) based on the ultimate development of the Airport. Obstacle Limitation Surfaces are conceptual (imaginary) surfaces associated with a runway, which identify the lower limits of the aerodrome airspace above which objects become obstacles to aircraft operations.

The subject property is located within the Inner Horizontal Surface of the OLS mapping requiring that all built development would not be greater than R.L. 77.7m in height. According to the City's intra mapping the Airport is between the 30 to 4-m contours and the subject lot is fairly flat across its extent sitting at the 25m contour.

Figure 10: Extract from Obstacle Limitation Surface Mapping (CGG, 2012)



The highest infrastructure to be located upon the site will be the conveyor system used to move grain into place within the open bulk heads. As the proposed open bulk heads are to be constructed with 1.8m walls this allows for a maximum height of 9.5m to the apex of the stacked grain. The DOG stacker which is used to conveyer the grain into place has a maximum reach of 11m.

With an obstacle limitation surface of 77.7m and the property sitting below the contour height of the airport the 11m maximum height of construction upon the site will not project through the Obstacle Limitation Surface. The proposal will not affect the ongoing and future use or expansion of the airport.

The below image is provided as an example only of the system used to conveyer the grain into place and demonstrates a setup used for an open bulkhead with 1.2m walls.

Figure 11: Example of conveyor system



5.5 State Planning Policies

SPP 2.5 – Rural Planning

State Planning Policy 2.5 Rural Planning applies to all rural land and rural land uses and seeks to:

“protect and preserve rural land for rural purposes including primary production, basic raw materials, regional facilities, and protection of biodiversity and landscape. Rural land accommodates a diverse range of land uses, primarily associated with primary production. There are also rural areas with suitable soils, climate, water (rain or irrigation) and access to services such that the land is considered to be high quality agricultural land. The intent of this policy is therefore to protect rural land and encourage a diversity of compatible rural land uses.”

As previously identified, the stockpiling of grain is intricately connected to the ongoing production of grain in the region with CBH storage bins a common presence in farming areas across Western Australia. It is considered that the storage of grain aligns with the intent of the Policy and that of High Quality Agricultural Land as it serves to support the grain growing industry by providing a stockpiling facility in an accessible and efficient location to provide the most productive returns for producers. It is a compatible land use in that it is string a commodity that is being grown within the adjacent area and is of a built form that will not inhibit the future development or use of surrounding land.

Grain production requires a strong logistics chain to achieve ongoing success and cost effectiveness of the industry moving forward in a time where costs for production are increasing. By approving storage in close proximity to producers and the Geraldton Port this will serve to reduce transport costs and allow for grain to be harvested and stored in more timely manner to maintain its quality.

In relation to this ‘stockpiling’ application where there is potential for emissions Section 5.12.1(b) of the Policy states:

“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;”

The Environmental Protection Authority’s (EPA) Environmental Protection Guidance Statement No. 3: Separation Distances between Industrial and Sensitive Land Uses provides decision makers with advice for the assessment of land uses that have the potential to produce emissions or land use conflict. In this regard a use that includes a ‘grain elevator’ such as grain stockpiling suggests the implementation of a 500m buffer and consideration of potential noise, dust and risk impacts.

This application is considered to meet with the requirements of the EPA Guidance Statement having provided strategies that will manage potential emissions and given that the recommended 500m buffer can be achieved. See Section 5.6 of this report for further information.

5.6 EPA Separation Distances between Industrial and Sensitive Land Uses

The EPA’s Environmental Protection Guidance Statement No. 3: Separation Distances between Industrial and Sensitive Land Uses provides recommendations and advice on potential emissions and suggested buffer

distances that may be appropriate for different land uses and activities. It is provided in order to protect sensitive land uses from potential industrial development impacts.

In relation to this application for the stockpiling of grain the Guidance Statement lists advice and recommendations in relation to activities that involve the use of a 'grain elevator' for the transfer of grain using conveyor belts.

The Guidance Statement suggests that potential impacts can include dust, noise and risk. It also recommends a generic buffer distance of 500m from a sensitive premise to an area in use of a grain elevator.

In relation to these aspects of the Guidance Statement the following is provided:

Dust

The applicant is aware of the potential for Dust Emissions and has provided as part of this application two separate Dust Management Statements; construction activities and ongoing operations. Further information has previously been provided within Section 4.1 of this report.

Noise

A Noise Management Plan has been provided which provides standard operating practices for the site in order to reduce noise emissions where practicable. Given the distance of the site from noise sensitive premises it is not considered that noise emissions would be of concern in relation to this proposal. Further information has previously been provided within Section 4.1 of this report.

Risk

Risk within the Policy relates to the "risk of an accident or incident causing injury or death to the public" (EPA, 2005). The site is not open to the general public.

Local grain producers who are not in the employ of CBH will enter the site to deposit grain to be stored at the facility during harvest periods. All persons entering the site have previously entered an agreement with CBH for the storage of their grain products and have agreed to adhere to the safety and quality control standards of CBH, acknowledging the requirement to follow the directives of CBH staff whilst onsite. All producers are supervised and directed by trained CBH staff and it is considered low risk therefore of injury or death with this level of onsite management.

Buffer

The EPA Guidance Statement provided a recommended standard buffer distance of 500m from a sensitive land use to a facility that utilises a 'grain elevator' such as the proposed grain storage facility.

A sensitive land use is defined within the EPA Guidance Statement as:

"land use sensitive to emissions from industry and infrastructure. Sensitive land uses include residential development, hospitals, hotels, motels, hostels, caravan parks, schools, nursing homes, child care facilities, shopping centres, playgrounds and some public buildings. Some commercial, institutional and industrial land uses which require high levels of amenity or are sensitive to particular emissions may also be considered "sensitive land uses". Examples include some retail outlets, offices and training centres, and some types of storage and manufacturing.

The following table lists the type of built development surrounding the proposed facility within a 1km radius and the relevant separation distance. Sites that currently only contain an outbuilding have also been included to demonstrate that should a habitable structure be located adjacent these structures it would still be located more than 500m from the proposed facility.

Table 1: Separation Distances

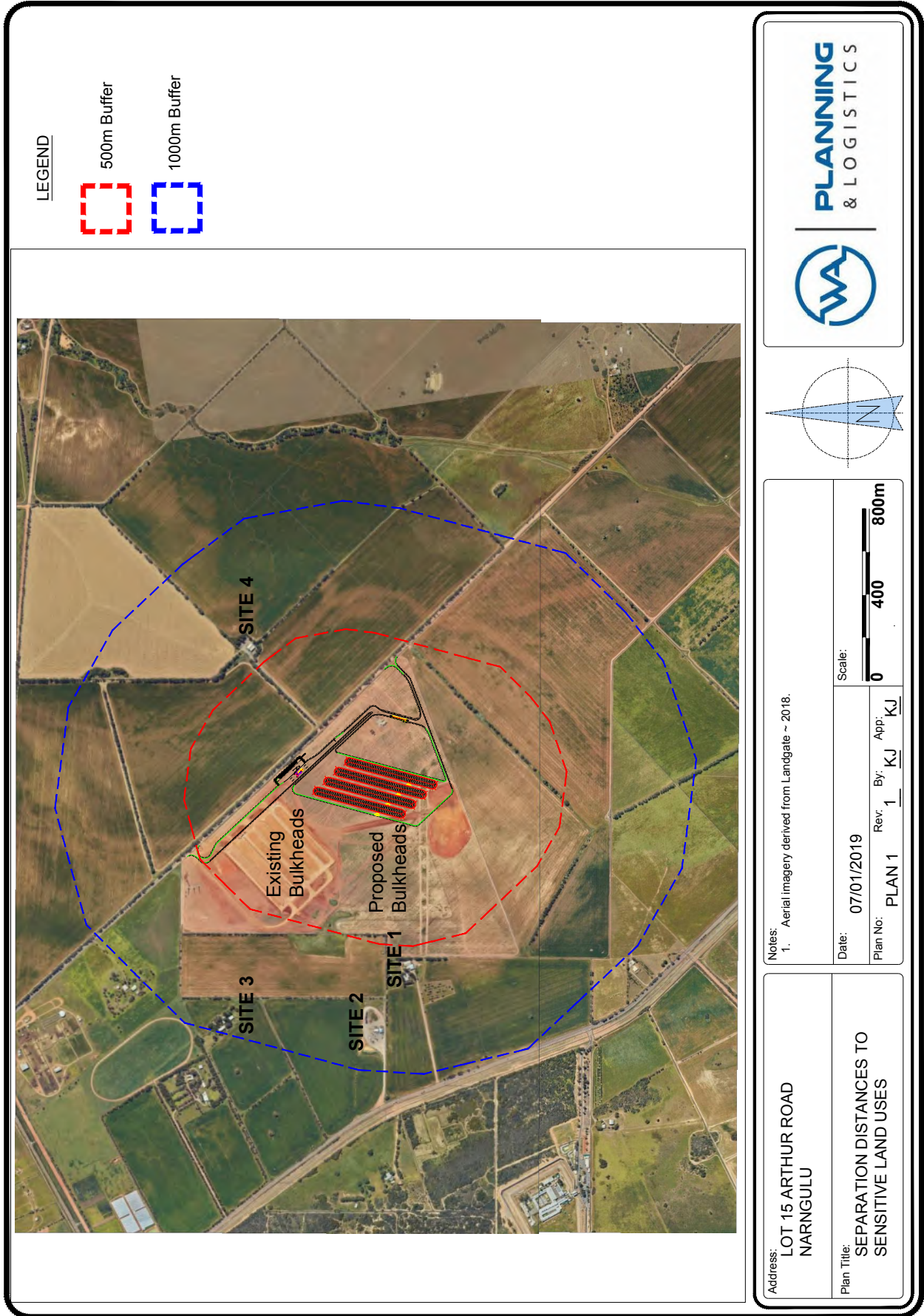
Site No.	Built Form	Separation Distance	Sensitive Land Use?
1	Dwelling and outbuildings	614m	Yes
2	Outbuildings only	843m	No
3	Dwelling and Outbuildings	990m	Yes
4	Outbuilding only	565m	No

A plan spatially representing the recommended 500m buffer and the location of the above listed sites is contained within Figure 12 .

As demonstrated within Table 1 and upon Figure 12, there are only 4 sites of built development that are located within 1km of the proposed stockpiling facility. Of these 4 sites only 2 contain sensitive land uses (Site 1 and Site 3 contain dwellings).

There are no sensitive land uses located within 500m of the proposed facility with the closest sensitive site located 614m from the facility and the other located 990m from the facility. The facility is therefore compliant with the recommended separation distance of the EPA Guidance Statement.

Figure 12: Separation Distances to sensitive land uses



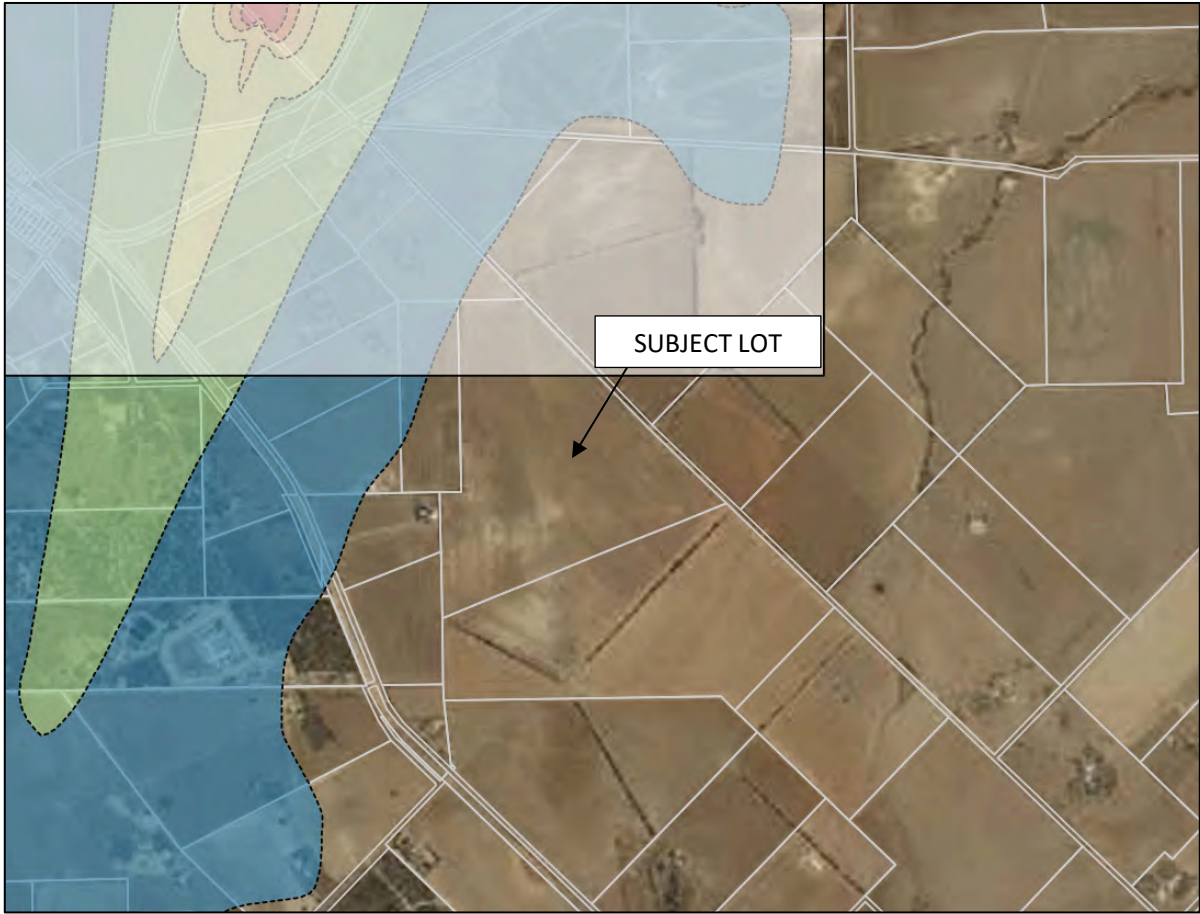
5.7 Local Planning Policies

Geraldton Airport Special Control Area LPP

Only a very minor portion of the lot falls within the Special Control Area. As this area is so small in nature, does not fall upon a portion of the property that is proposed to be developed, and the application being for non-habitable uses, this Policy is not considered relevant to the assessment of this proposal. It is also noted that this Policy predominately deals with the potential for noise generated by the airport impacting upon proposed development, in this instance the development of a stockpiling facility would not be affected by its proximity to the airport as it relates to noise.

Section 5.4 of this report has previously discussed the compatibility of the proposal as it relates to the Obstacle Limitation Surface.

Figure 13: Extract of Geraldton Airport Special Control Area ANEF Noise Contours Map (CGG, 2016)



6. REFERENCES

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