

URBIS

DEVELOPMENT APPLICATION – FEEDMILL COMPLEX

Lot 2 (No. 429) Springhill Road, Cuballing

Prepared for
LGPM
August 2020

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INTRODUCTION

On behalf of our client LGPM, Urbis is pleased to submit this development application for a new bulk feed mill facility located in Shire of Cundalling (**the Shire**), Western Australia.

This planning report has been prepared in support of the application and has been set out in the following manner:

- **Site Details & Context** – An outline of the site details and context relating to the site and the proposed development.
- **Proposal** – An overview of the proposed use and works subject to this application.
- **Technical Assessment** – A summary of the findings of the technical assessments undertaken (traffic, environmental management, bushfire management and noise management).
- **Planning Assessment** – A planning assessment of the proposal demonstrating its overall merits and acceptability.

The following information has been provided as part of this development application along with this planning report to assist the City of Vincent and Metro Inner-North Joint Development Assessment Panel (JDAP) with its assessment:

- Completed Shire of Cuballing Application for Development Approval Form.
- Completed DAP Form 1.
- A copy of the relevant Certificates of Title and associated deposited plans.
- Development Plans.
- Traffic Impact Statement prepared by Cardno (enclosed at **Appendix A**).
- Environmental Management Plan prepared by Coterra Environment (enclosed at **Appendix B**).
- Bushfire Management Plan prepared by Bushfire Safety Consulting (enclosed at **Appendix C**).
- Acoustic Report prepared by Lloyd George Acoustics (enclosed at **Appendix D**).

1. SITE DETAILS & CONTEXT

1.1. SUBJECT SITE

This proposal is located south-west of the Cuballing townsite at Lot 2 and 8 (No.429) Springhill Road, Cuballing (**the site**). Refer to **Table 1** for lot details. The two lots are under ownership by the one of three of the owners and operators of Patmore Feeds. **Figure 1** and **2** provides a aerial imagery of the site and a cadastral plan. As seen in the cadastral plan, Springhill Road currently divides Lot 8 in an east-west direction. The proposed development only affects the portion of the lot to the south of Springhill Road.

Subdivision approval was recently granted to re-subdivide the land by way of amalgamation of the site and the creation of lot 501 (refer to **Figure 3**). In the north-east corner of the site, Lot 501 comprises majority of the land in which the proposed development is to be situated, however the plans currently show the facility extending beyond the lot boundary into lot 500. It is expected that some changes to lot boundaries may be required to facilitate this development which will be subject to a separate application and can be required as a condition of this development application.

Table 1 – Lot Details

Lot No.	Plan No.	Vol / Folio	Proposed Lot / DP Details (Pending)	Street Address	Area	Landowner	LPS 2 Zoning
2	D072792	1789 / 214	Lot 500 and 501 on P418042	429 Springhill Rd, Cuballing	164.79ha	William John Patmore	General Agriculture
8	P052749	2656 / 573	Lot 500 and 501 on P418042	N/A	17.91ha	William John Patmore	General Agriculture

1.2. EXISTING USE & DEVELOPMENT

The site is a rural paddock currently grazed by livestock and surrounded by large rural cropping and grazing paddocks. The site is improved by the following elements:

- Whitford Fertilizers are to the south of the proposed feed mill and two rural residential properties which are all under the same ownership (William John Patmore / Patmore Feeds).
- Various earth dams to collect rainwater.
- Various internal tracks and accesspoints onto Springhill Road.

1.3. SITE CONTEXT

Cuballing townsite is located approximately 190km south east of the Perth CBD, within the Shire of Cuballing. The site is located approximately 4km to the south-west of the Cuballing townsite and is accessed from the townsite via Springhill Road which is identified as a local road. Refer to **Figure 4**.

The lands surrounding the site generally comprised lands cleared of vegetation that is used primarily for agricultural purposes.

To the south of the development area is an existing fertiliser sales business that is owned by Patmore Feeds. Nearby two existing rural residential properties are located which are also in Patmore Feed ownership.

Beyond the area of the proposed development the following key features are noted:

- To the north of the site boundary, is the Rosedale Nature Reserve however as above mentioned the area of the site that is subject to this development is approximately 1.2km away to the south.

- To the east of the site, a freight rail exists approximately 1.5m away from the development area. Beyond, the Great Southern Highway is located which is a key State road connecting various regional towns in the southern wheatbelt region.

1.4. ENVIRONMENTAL CONSIDERATIONS

The following key environmental considerations are associated with the site:

- A portion of the site adjacent Springhill Road is identified within the Department of Fire and Emergency Services (**DFES**) Bushfire Risk Mapping (refer to **Figure 5**). Refer to **Section 3.3** of this report for bushfire risk management considerations.
- The site is located within a proclaimed surface water area under the *Rights in Water and Irrigation Act 1914* (Landgate, 2020). This means that licence is required to take water from a water course. There are no public drinking water supply areas, wellhead protection zones, reservoir protection zones or public drinking water bores within or surrounding the site.
- The site is **not** located within a proclaimed groundwater area under the *Rights in Water and Irrigation Act 1914* (Landgate, 2020), nor is groundwater located close to the surface. This means a groundwater license is not required to abstract groundwater.
- Most of the site is cleared of native vegetation, and based on this, areas which could provide habitat for fauna are absent.
- The site is located within the trigger distance of State Planning Policy 5.4 – Road and Rail Noise (**SPP 5.4**) due to the presence of the rail line adjacent the site, however the application area does not fall within the area required to address SPP 5.4.

1.5. PRE-LODGEMENT ENGAGEMENT

Patmore Feeds own a large portion of land surrounding the site (refer to **Figure 2**) but are surrounded by a variety of landowners who are predominantly local farming operators or businesses. Directly adjacent the site to the north-east, a reserve exists that is owned by the State of Western Australia.

The applicant has undertaken their own consultation efforts and made contact with all landowners to make them aware of this proposed development, and are committed to maintaining 'good neighbour' practices by keeping them up to date with information regarding the project.

The applicant and project team comprised of the project town planning consultants (Urbis), the project traffic consultants (Cardno) and the project environmental consultants (Coterra Environment) met with the Shire in late July 2020 to discuss the project and ensure all required information is included within this development application to commence the assessment period.

Figure 1 – Aerial Plan



Figure 2 – Cadastral Plan

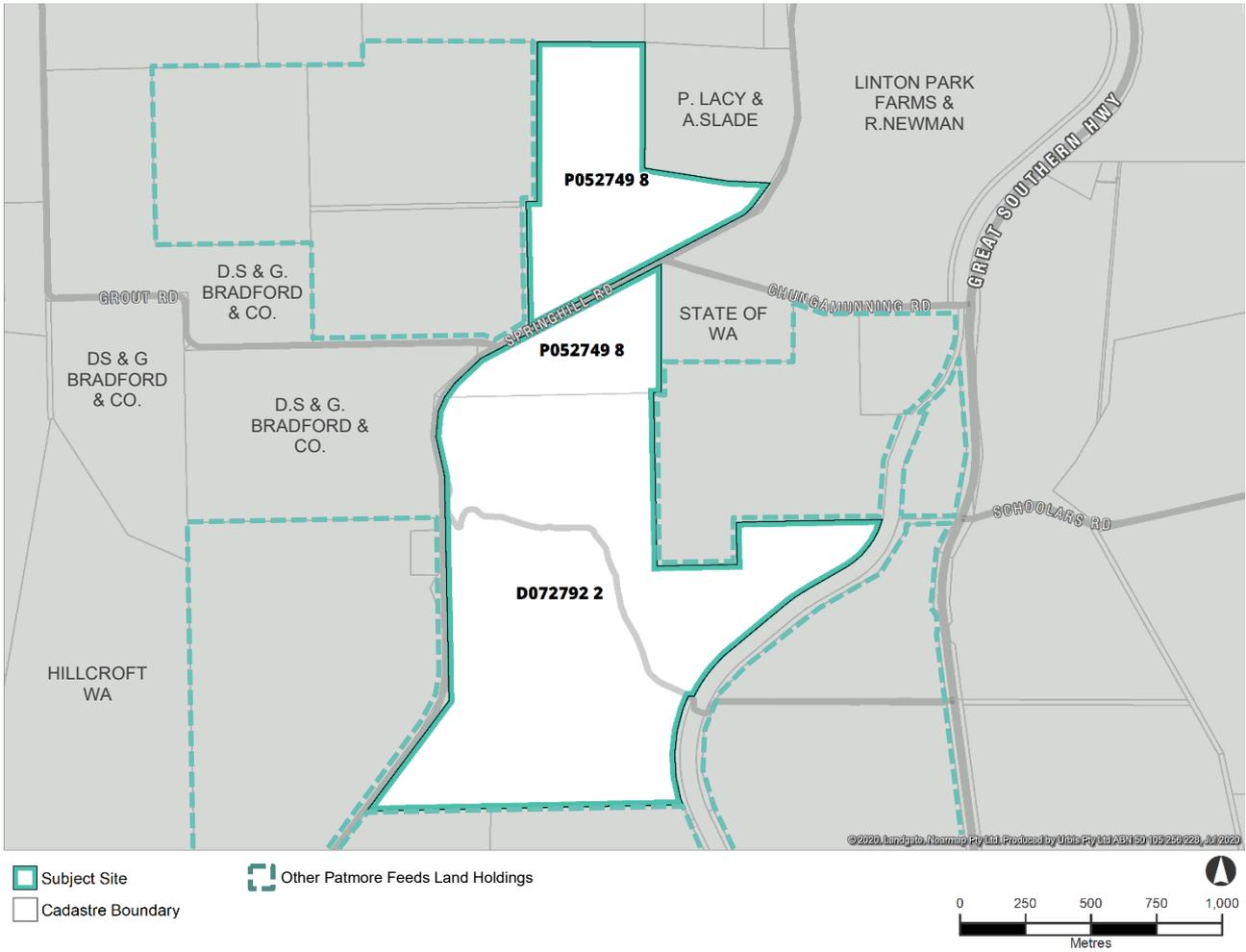


Figure 3 – Pending Deposited Plan 418082

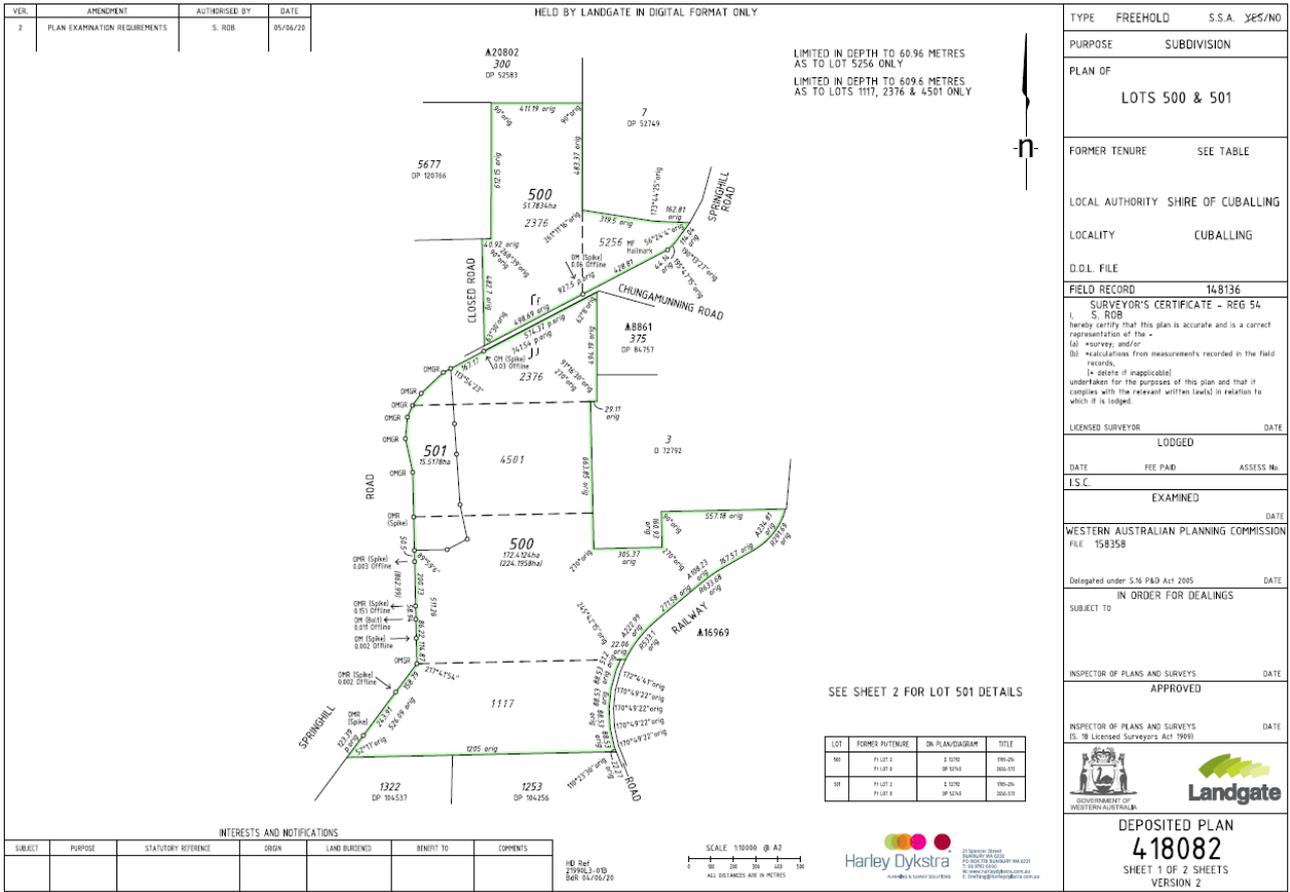


Figure 4 – Location Plan

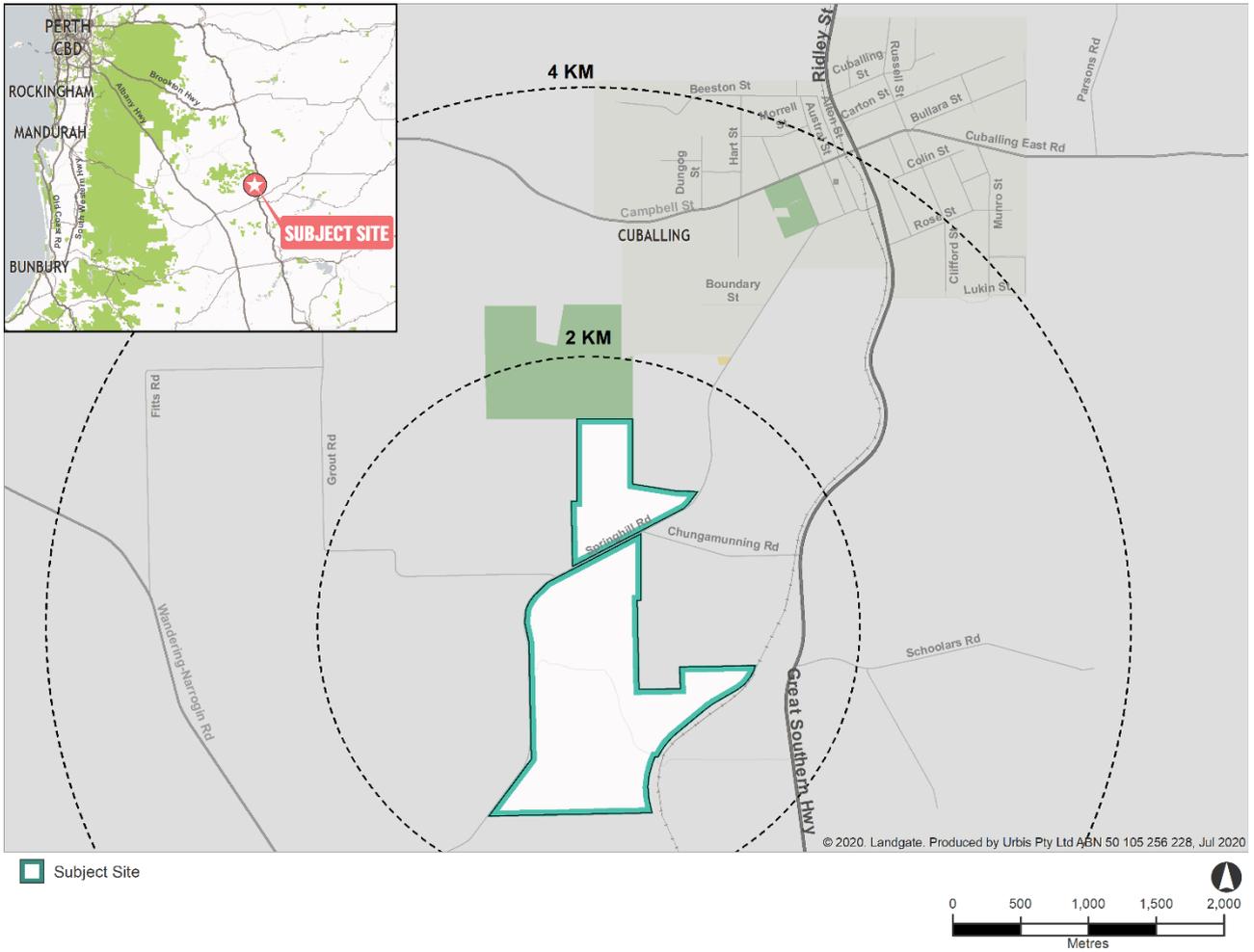
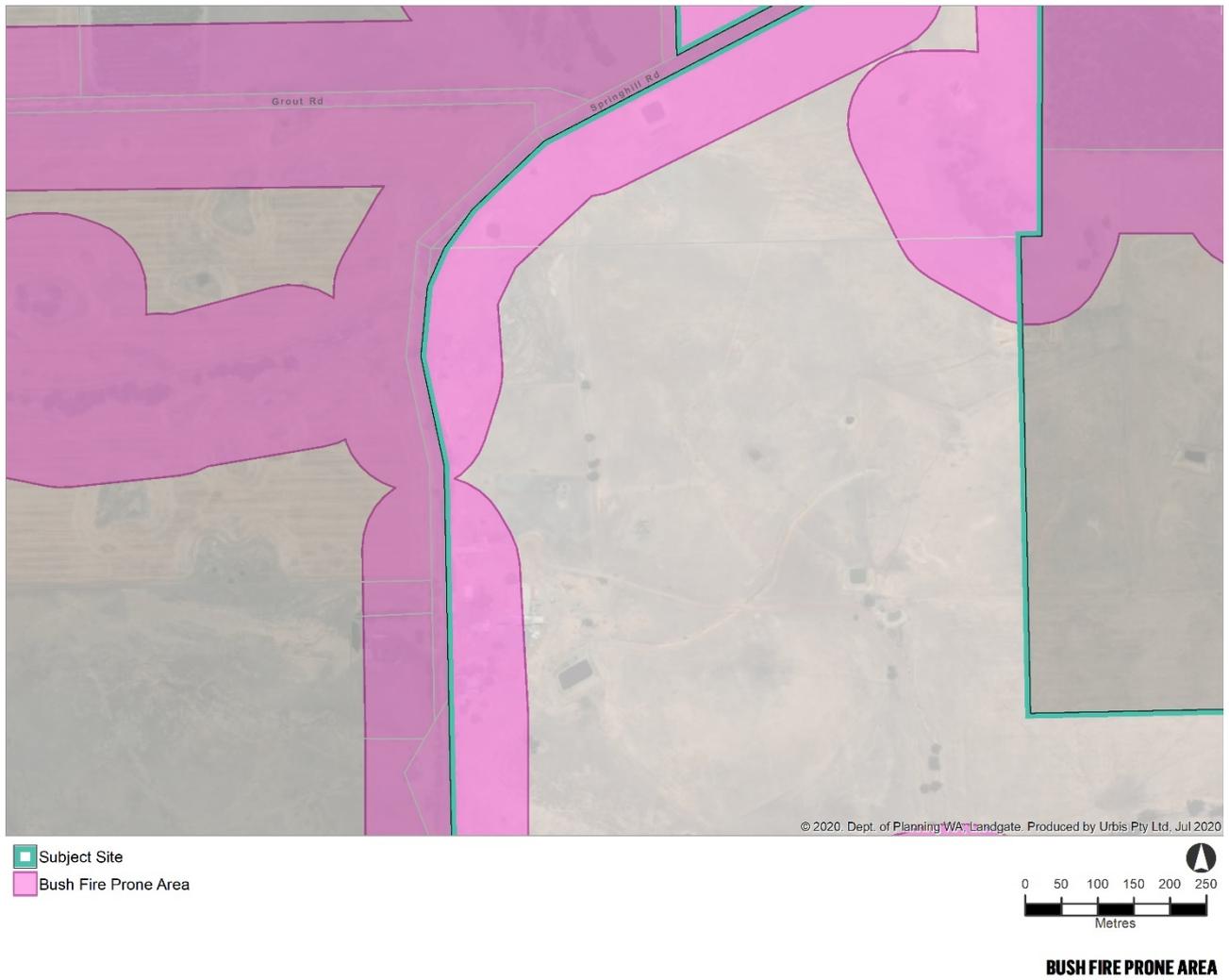


Figure 5 – Bushfire Risk Mapping (DFES 2020)



2. PROPOSED DEVELOPMENT

2.1. KEY ELEMENTS

This development application seeks approval for the construction and operation of a feed mill on the site. Situated within a key agricultural area, the site will manufacture, store and sell animal feed in bulk quantities to the local farming community, directly supporting the localities core agricultural economy. The feed mill facility operates by taking in raw materials of widely ranging physical, chemical and nutritional composition and converting this into a homogenous mixture suitable for producing a desired nutritional response in the animal to which the mixture is fed. The key process steps/infrastructure include:

- Grain and materials are received onsite from trucks and transferred to the appropriate location within the site.
- The product is then conveyed and elevated up a tower and fed through a cleaning system to clear metals and foreign matter.
- The raw material is then elevated again and transferred into the in-loading silos for storage.
- Straw bales are received onsite via trucks and stored within the straw intake and milling building. The straw bales then undergo milling to create a usable state for the mixer.
- Batching is then undertaken which involves mixing selected ingredients for the specific project mix desired. The dry ingredients are mixed with other nutrient-containing preparations and further liquids are added.
- Steam is added to the mixture and blended through the batch, then passed through retention conveyors before being fed in to the pellet press.
- Following extrusion, the product is pressed, cooled and formed into pellets.
- Cooling and drying of the product is carried out with any product fines subsequently collected via sieve.
- The final product is stored for bulk out load via the out-loading silos before being distributed to customers.

The development includes a variety of buildings and structures including a processing building, in-loading and out-loading silos, a boiler house, an office and workshop area, a straw intake and milling building, and storage areas to service the facility. The built area of the feed mill extends for approximately 140m when looking to the development from Springhill Road and the highest point provided is approximately 29.4m being top of the in-loading silo and processing building.

The following key elements associated with the proposed feed mill as noted:

- **Capacity** – The feed mill's estimated capacity is 180,000 tonnes of animal feed per year, based on 24 hour production, 6 days a week for 50 weeks of the year. The facility has been designed to accommodate this maximum capacity.
- **Employment numbers** – The feed mill is expected to have 20-25 staff employed with no more than 20 staff expected on site at any one time.
- **Operation** – The mill is proposed to operate for 50 weeks of the year, 6 days a week, for up to 24-hour a day.

2.2. VEHICLE ACCESS & CIRCULATION

The proposed development includes 2 access points from Springhill Road:

- 1 to the north of the feed mill, which provides access for the road trains and semi loaders (**Access A**).
- 1 to the west of the feed mill for staff and visitor use only, providing vehicle access to the staff parking area (**Access B**).

Access A will be the primary point of access. From this point, vehicles are able to access the feed mill facility via an internally located driveway approximately 260m in length.

It is estimated that up to 115 loads will access the site per week, approximately 19.2 loads per day and 1.6 loads per hour via this accessway primarily in the form of 60 tonne road trains in addition to 25 – 40 tonne semi loads. Over the course of a year, this equates to approximately 6,000 (3,000 dropping off grain, and 3,000 collecting pellets) large vehicles accessing the site.

However as much as 20% of these vehicles are expected to be both unloading grain and loading pellets from the feed mill which reduced the overall number of vehicle trips expected.

Springhill Road is already used by locals a key vehicle route to transport grain to CBH receival sites in the area year round. With this development, it is expected that the grain will instead be stored on farm and delivered to this new feed mill throughout the year. As such, it is not expected that the local traffic will substantially change due to the development.

Access B, the secondary access point, will be used by staff and visitors only and provides access to a car parking area that contains 18 standard bays and 2 disabled bays. This quantity of bays is required to cater to the maximum number of employees expected at the site at any one time. This design ensures that there will be no conflicts between trucks and staff vehicles accessing the site, and significantly improves driver safety. This design also ensures there will be no conflict with vehicles accessing the Whitfords Fertiliser site further to the south. At a maximum, 40 daily car trips (20 in, 20 out) are estimated.

Based on the above information, it is estimated that the development could generate a maximum of 84 vehicle trips per day (combination of large and small vehicles).

The impacts of the developments estimated traffic generation are further discussed in **Section 3.1** of this report.

3. TECHNICAL ASSESSMENT

3.1. TRAFFIC IMPACT STATEMENT

In accordance with the Western Australian Planning Commission (**WAPC**) Transport Assessment Guidelines, a Traffic Impact Statement (**TIS**) has been prepared by *Cardno* to assess the traffic impact of the development. A copy of the TIS is enclosed within this application (refer to **Appendix A**). A summary of this assessment is provided below:

- Springhill Road is identified as a local access road under the care and control of the Shire. Current posted speed limits are 110km/hour (default), however advisory signs of 80km/hour have been erected near the bend of Springhill Road where the primary access to the site is provided.
- Traffic volumes obtained from the Shire indicated that average weekday traffic volumes are in the range of 75 – 92 vehicles on a daily basis.
- No crashes have been reported on Springhill Road (midblock), nearby Grout Road (midblock), or the intersection of these roads.
- Noting the rural nature of the site, no public transport facilities or pedestrian or cycling facilities are available within proximity of the site. As such the primary mode of transportation to/from the site is via private vehicle.
- Assuming a design speed of 90km/hr, the Safe Intersection Sight Distance (SSID) for Access A is 214m as per *Table 3.2 of the Austroads guide to Road Design Part 4A*. Based on a desktop assessment, this is achievable on the site if the vegetation on the southern road side verge is cleared (and kept clear) so it won't obstruct the sight-lines.
- Swept path analysis was conducted for the internal vehicle circulation area of the development and Access Point A (in respect to both Springhill Road access and egress) for a B-double truck. The swept path plans confirm that the B-double trucks can sufficiently manoeuvre within the truck circulation area within the site and that the proposed cross-over is sufficiently wide to accommodate the turning movements for the B-doubles at the crossover.

As such, the proposed access points provided to service the development are considered to be safe and efficient, noting that the sight line requirements of the *Austroad guide* can be achieved. Through a combination of vegetation clearing and maintenance of the advisory signs nearby the bend of Springhill Road to lower vehicle speeds, safe sight lines and access into/from the site is achieved.

Through swept path analysis, it has been demonstrated that vehicles are able to access the site in a safe manner and are able to exit the site in a forward gear. The swept path analysis also demonstrates that vehicles do not rely on reversing to navigate the internal circulation within the site.

3.2. ENVIRONMENTAL MANAGEMENT

Coterra Environment were engaged to undertake an environmental assessment of the proposal and prepare an environmental management plan associated with the development proposal. A copy of the environmental management plan is enclosed within this application (refer to **Appendix B**).

In summary, this identified the following key matters for consideration:

- EPA Guidelines identify the requirement for a 500m separation distance/buffer between animal feed manufacturing facilities to sensitive land uses. The two closest dwellings under the same ownership as the feed mill are closer than the generic separation distance guidance, however a number of management actions are proposed to address potential impacts in relation to noise, dust and odour (see below).
- Respecting the surrounding farmers 'Right to Farm' and mitigating land use conflicts, potential emissions and pest management have been considered through various management measures as follows.
- A site risk assessment/classification for activities generating uncontaminated dust for the site (construction works) was completed with the site's classification score identified as 252 which is

considered to be 'low risk'. The applicant is committed to the following dust management measures in accordance with and on top of DWER guidelines:

- A contingency plan is supplied to detail the activities to be undertaken should dust impacts occur.
- Allowance is included for water-cart operations, wind fencing and surface stabilisation during construction.
- Stabilisation and minimalization of disturbed land.
- A complaints management system to be put in place.
- Notice to be erected at the site with works and contact details included.
- Visual monitoring of dust generation will be undertaken with a record available for inspection if required.
- Notification of immediate neighbours of the site of the proposed commencement dates, the construction programme and duration of construction works prior to commencement.
- Building and road construction materials and management measures have been considered to further control dust during operation. The complaints register will be maintained by the operator, and further investigation into specific corrective actions will be explored and applied in relations to any complaints received.
- The land is sufficiently sizes to accommodate the development and its sewerage disposal requirements in accordance with the *Government Sewerage Policy*.
- No significant noise emissions beyond typical construction noise is expected during construction. The following general management actions will be undertaken to consider noise matters:
 - Construction hours will be limited to between 7.00AM and 7.00PM Monday to Saturday (no construction work to be undertaken on public holidays).
 - Occupiers of the two nearby residential premises will be notified on the proposed commencement date and duration of construction works prior to works onsite commencing.
 - A Site Complaints Register will be established to record any complaints received in relation to construction or operation activities at the site. Any complaints received will be investigated and management/contingency actions implemented if required.
 - Notification of immediate neighbours of the site of the proposed commencement dates, the construction programme and duration of construction works prior to commencement.
- To minimise the risk of the spilling or leaking of hydrocarbons from construction vehicles and equipment, the following management measures are proposed:
 - All vehicles and equipment to be utilised onsite are to be regularly serviced and maintained.
 - Hydrocarbon spill clean-up kits to be available onsite during the construction and operation phases of the project.
 - Any storage of hydrocarbons onsite to be undertaken in an appropriately bunded location(s). The integrity of the bunds is to be inspected regularly.
 - Where practical, re-fuelling of vehicles and equipment is to be undertaken offsite. In the event of refuelling activities occurring onsite, spill catchment trays shall be deployed to capture any leaks and spills during the process.
 - Any spills and associated clean-ups are to be documented.
 - Fuel/chemical storage requirements and spill clean-up and reporting procedures are to be made available to all personnel onsite and are to be included within the site induction package.
- To manage pests and prevent invasion, the following management actions will be taken:
 - Prevent access to food through the storage of grain in sealed silos, regular cleaning of the facility and the use of equipment which has been designed to eliminate food within the equipment.

- Prevent access to shelter through avoiding creating places for pests to hide or breed, or for birds to roost.
 - Maintain a setback from the facility from surrounding vegetation.
 - Consider treatments if pests are observed such as via fogging, pesticide application or the use of baits.
- Stormwater runoff may occur from roads and external hardstand areas after rain. Drainage from these areas will be managed on-site and be directed to swales or basins where infiltration can then occur.
 - There is no process wastewater generated by the facility. The proposal is able to comply with the key requirements of the Government Sewerage Policy.
 - The facility will not provide any waste as all feed inputs will be converted into usable product, however general waste such as office waste, sweepings and used packaging materials may be generated. These waste products (estimated to be up to 3sq.m of general waste per week) will be collected in bins on-site and delivered to the nearby waste transfer station.

This demonstrates the proposed development is able to operate in accordance with the applicable environmental and management requirements, and demonstrates the proposals consideration for ‘good neighbour’ practices particularly through minimising the developments impact from a dust, noise, odour and ensuring appropriate management mechanisms are in placed both during and post construction.

3.3. BUSHFIRE RISK MANAGEMENT

As shown in **Figure 5**, the site is identified within a bushfire risk prone area which is triggered by the road side vegetation along Springhill Road. As such, a bushfire attack level (**BAL**) contour map and Bushfire Management Plan (**BMP**) are required in accordance with State Planning Policy 3.7 – Planning in Bushfire Prone Areas (**SPP 3.7**) and the Guidelines for Planning in Bushfire Prone Areas V1.3 (2107) (**Bushfire Guidelines**).

Bushfire Safety Consulting have been engaged to undertake this assessment – a copy of the BAL contour map and BMP is enclosed within this application (refer to **Appendix C**).

- A Method 1 BAL assessment has been undertaken to determine predicted radiant heat flux level on the site and the proposed feed mill does not exceed a predicted radiant heat flux level of 29kW/m² (i.e. BAL-29). The 50 metre APZ of managed grass vegetation around the facility drops the BAL rating to BALLOW on all buildings and structures.
- The greatest long term threat identified is the Class G Grassland vegetation that surrounds the feed mill, with the ultimate threat being fast moving grass fire across the landscape. This will be relatively low intensity but fast moving and dangerous during the brief period of the fire front impact. The feed mill is exposed to this landscape in all directions, however the establishment of a 50m Asset Protection Zone (**APZ**) will significantly reduce the predicted levels of radiant heat, flames and ember attack.
- As such, an APZ will be established and maintained to standards around all feed mill structures and buildings for a minimum of 50m. The 50 metre APZ of managed grass vegetation around the facility drops the BAL rating to BAL-LOW on all buildings and structures. The APZ will need to be maintained by the landowner ongoing and any future landscaping of the site needs to comply with the APZ requirements.
- The facility is also connected to mains/scheme water with additional rainwater captured for onsite use. Groundwater may also be investigated as a back-up supply.
- Industrial and office buildings are Class 5 and 8 buildings in the Building Code of Australia (**BCA**) and the proponent will outline how compliance with the BCA, in particular E1.5 (including the Specifications), and with AS 2118.4 and AS 2419.1 is achieved.
- 2 access points into the site for fire-fighting and other emergency vehicles has been accommodated.

With the implementation of the BMP, the bushfire threat has been reduced for staff, visitor and fire fighters in the area, and the proposal development achieves all the Acceptable Solutions and Performance Principles in the Bushfire Guidelines and has demonstrated compliance with SPP 3.7.

3.4. ACOUSTIC ASSESSMENT

Given the proposed development is proposed to operate for 24 hours a day, 6 days a week, an acoustic assessment was undertaken by *Llyod George Acoustics* to assess the developments acoustic impact on nearby sensitive land uses and demonstrate its ability to comply with the allowable levels of the Environmental Protection (Noise) Regulations 1997 (**Noise Regs**). In this regard, the closest noise receivers were located to the south of the site nearby the existing dwellings under Patmore Feed ownership. Other receivers were placed further to the west of the site where other rural dwellings exist.

A copy of the Acoustic Report is enclosed within this application (refer to **Appendix D**). This report demonstrates that the proposed development's associated noise levels predicted through the assessment are able to comply with the assigned levels within the Noise Regs at all times. As such, noise mitigation does not require further consideration.

Given the above, the development is considered to be able to achieve compliance with the Noise Regs at all receiver locations and not unduly impact neighbours including existing residents to the south and west of the development.

In addition, the report recommends the following best practices to be implemented to further minimise noise impacts:

- If reversing or plant starting alarms are deemed necessary, all plant should to be fitted with broadband reversing alarms; and
- The route required for loading and unloading of trucks should be designed such that the trucks are not required to reverse, this ensures truck reversing alarms are minimised.

In this regard, there will be **no** start-up alarms for equipment within the development.

In terms of minimising reversing alarms from trucks, the development has been specifically designed to only have a clockwise flow of trucks so that no reversing is required. It is not expected that any trucks will be required to reverse at any location within the feed mill.

As such, the development application can clearly achieve compliance with the Noise Regs and has demonstrated that there will be no undue impact to neighbours in respect to noise.

4. PLANNING ASSESSMENT

This section of the report provides an assessment of the proposal against the relevant State and local planning frameworks including:

- The Shire's Local Planning Scheme No. 2, dated May 2005 (**LPS 2**).
- The Shire's Local Planning Strategy, dated June 2019 (**Strategy**).

4.1. LOCAL PLANNING ASSESSMENT

4.1.1. Local Planning Scheme No.2

4.1.1.1. Zoning

Within LPS 2, the site is identified within the 'General Agricultural' zone (refer to **Figure 6**) which has the following associated objectives:

- *To preserve productive land suitable for grazing, cropping and other compatible productive rural uses in a sustainable manner;*
- *To allow for the extraction of basic raw materials where it is environmentally and socially acceptable;*
- *To ensure the preservation of the rural character and rural appearance of land within the zone;*
- *To encourage intensive agriculture where soil conditions and location are appropriate and it can be demonstrated that off-site impacts (if any) will not adversely affect existing agricultural activities;*
- *To protect the economic viability of rural zoned land through a presumption against subdivision except where such subdivision will enhance and/or promote the viability and diversity of general farming activity;*
- *To preserve and protect the natural undeveloped land areas throughout the zone; and*
- *To ensure that natural drainage patterns/catchments throughout the Shire are recognised in land management practices.*

The proposed development is consistent with the objectives of the zone as outlined below:

- The proposed development consumes minimal land within the wider site and Patmore Feeds land holding which remains as suitable land for grazing, cropping and other compatible rural uses, and preserves the rural characteristic of the area.
- The proposed development provides the local farming community with animal feed in bulk supply, servicing their local needs and providing a locally based facility to minimise transport and commuting needs.
- The proposed use is directly associated with general agricultural by way of manufacturing and selling animal feed.
- The proposed development is situated adjacent an area where compatible rural uses (to general agricultural pursuit) are already situated, building upon the existing character of the development/land fronting this portion of Springhill Road.

Given the above, the proposed development is considered to be entirely appropriate in the 'General Agricultural' zone.

4.1.1.2. Land Use Permissibility

Considering the land use definitions within LPS 2 and the Deemed Provisions of the Planning and Development (Local Planning Schemes) Regulations 2015 (**The Regulations**) the proposed development is best characterised within the 'Industry – Primary Production' land use category which means a premise used for –

- (a) *To carry out a primary production business as that term is defined in the Income Tax Assessment Act 1997 (Commonwealth) section 995-1 or*

(b) For a workshop servicing plan or equipment used in primary production businesses.

Under LPS2, 'Industry – Primary Production' is a discretionary (D) use within the 'General Agricultural' zone, which is capable of approval but requires the Shire to exercise its discretion based on the uses appropriateness in the zone.

As noted above, the land use is considered to be entirely in accordance with the purpose of the 'General Agricultural' zone.

4.1.1.3. Development Requirements

Part 4 of LPS 2 lists various development requirements that are applicable to certain land uses within each zone. There are no development requirements listed that are relevant to the 'Industry – Primary Production' use of the land within the 'General Agriculture' zone.

No car parking standards are included in LPS 2 for 'General Agriculture' developments, with the minimum requirement noted as to be determined by the Shire. The proposed development included 18 standard bays and 2 disabled bays which is considered to be sufficient to cater to the expected maximum number of staff and visitors on the site at any one time (x20).

The car parking areas physical separation from the truck circulation area ensures any conflicts between cars and trucks are avoided. Providing a separate staff/visitor access point from Whitfords Fertilisers to the south also ensures there is no conflict between users of this development.

Based on the above, the development is considered to be compliance with the requirements of LPS 2.

Figure 6 – LPS 2 Zoning Extract



4.1.2. Local Planning Strategy

The Strategy has been prepared by the Shire to establish various strategies to guide the planning and development of the locality over the next 10 – 15 years and establish actions to achieve these strategies.

Section 3.5.1 of the Strategy identified strategies and actions to facilitate opportunities for agricultural production to ensure farming is protected as the core business of the district in the foreseeable future, whilst also allowing for a range of compatible rural pursuits. The Strategy notes the on-going potential for rural use other than broad acre farming, to be complementary and compatible within the rural setting of the locality, which could be considered as including the proposed development for reasons outlined above.

An assessment against the identified strategies associated with Agriculture are included in **Table 2** to demonstrate the land uses appropriateness in the context of the future planning for the locality.

Table 2 – Local Planning Strategy Assessment

Action / Strategy	Assessment
<i>S36. Support existing agriculture pursuits, while encouraging the establishment and adoption of new farming practices.</i>	The proposal provides a feed mill that will manufacture, store and sell animal feed to the local community, directly supporting existing core agricultural efforts and supporting the local economy.
<i>S37. Promote a range of rural and associated uses compatible with the capability of the land and where it appropriately addresses off-site impacts.</i>	As above noted, the proposed development provided for a compatible use of the land that supports agriculture in the locality. The development has appropriately considered its off-site impacts from an environmental, bushfire, traffic and noise perspective as detailed above to demonstrate its acceptability in the locality.
<i>S38. Support animal premises and rural industries where relevant site specific matters are addressed and appropriate buffers are provided.</i>	As described in Section 3.2, appropriate separation distances have been provided from the facility to surrounding sensitive uses. The two houses to the south of the feed mill, which are under ownership by Patmore Feeds, are within 500m of the development however the environmental assessment has demonstrated that management mechanisms are suitable to minimise any impacts of the development.
<i>S39. Require proponents of animal premises and rural industries to address management considerations near the Dryandra Woodland.</i>	The Dryandra Woodlands identified through the Strategy is not located within close proximity to the site.
<i>S40. Control the number of dwellings on rural lots.</i>	No dwellings are proposed through this development application.

The proposal does not undermine any strategic objectives under the Local Planning Strategy, and represents a significant benefit for existing agricultural operations in the district and increased local employment through local production of a product extensively used by local farmers.

5. OTHER APPROVALS

Animal feed manufacturing is recognised as a prescribed premises under Part V of the Environmental Protection Act 1986 (**EP Act**). Under the EP Act, a prescribed premise is required to obtain a Works Approval (for construction) and a Licence or Registration (for operation).

The purpose of a Works Approval is to allow the Department of Water and Environmental Regulation (**DWER**) to assess the environmental acceptability of a proposal against standards and policies. Works Approvals also contains conditions to ensure the premises can operate in an environmentally acceptable manner and that the works themselves do not cause unacceptable environmental impacts.

These approvals will be obtained by the proponent alongside this application.

6. CONCLUSION

We trust this development application contains all information necessary to enable a swift and favourable determination. This development application seeks approval for the construction and operation of a feed mill on the site. Situated within a key agricultural area, the site will manufacture, store and sell animal feed in bulk quantities to the local farming community, directly supporting the localities core agricultural economy and local employment.

With site context, and the potential future redevelopment of the surrounding area in mind, the feed mill has been designed with a focus on the following elements:

- Considering sight lines along Springhill Road and providing safe vehicle access and egress to/from the site.
- Minimising the environmental and acoustic impact of the development, including in relation to bushfire risk and dust.
- Providing a durable and easily maintained design.
- Minimising amenity impacts and the visibility of the facility from neighbours, Springhill Road and Great Southern Highway.

This report has provided both a technical and planning assessment of the proposal against the relevant planning and environmental requirements associated and has demonstrated the applications compliance from a planning, acoustic, bushfire and environmental perspective.

Should you require any further information or have any queries relating to the proposed development, please feel free to contact Ray Haeren (rhaeren@urbis.com.au) or Declan Creighan (dcreighan@urbis.com.au) at Urbis or call the office on 9346 0500. We look forward to working with the Shire, relevant referral authorities and the DAP on this exciting project.

DISCLAIMER

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

TRAFFIC IMPACT STATEMENT