

**ADDITIONS TO 'STOCKPILING' LAND USE - LOT 15 (NO 1795) ARTHUR ROAD, NARNGULU**

CBH is seeking development approval from the City of Greater Geraldton for proposed additions to an existing approved 'stockpiling' land use at Lot 15 (No 1795) Arthur Road, Narngulu. The subject application is proposed 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**

Lot 15 (No 1795) Arthur Road, Narngulu (subject site) is located approximately 8 kilometres south-east of the Geraldton townsite as shown in Figure 1 below.



Figure 1: Location Plan

## Background

As you know, CBH had a record harvest last year where its existing storage infrastructure was not enough to keep up with the record crop. On the 31 August 2021, the City of Greater Geraldton assisted CBH with this storage deficit and approved a development application for the temporary construction and use of six emergency bulkheads with a total capacity of 193,050 tonnes at its Narngulu facility for a twelve-month period. Given the current forecast of another significant harvest for FY22/23, on the 05 August 2022 the City of Greater Geraldton extended this development application for a further twelve months.

CBH Group have a strategic objective to be able to receive an average crop of 22 million tonnes and out turn 70% of this crop in the January to June shipping window by 2033. To meet these objectives roughly 700,000 tonnes will need to be built each year. In the Geraldton zone, there is roughly a 750,000-tonne storage deficit. To achieve these objectives, storage capacity must be expanded at strategically chosen sites to meet the pace and innovation of CBH growers. Narngulu is a critical site in the Geraldton supply chain that has the potential to resolve a large proportion of the 349,000 tonnes storage deficit expected at Geraldton Port Precinct by 2033.

Given the size of the storage deficit, it is envisaged a two-stage build executed over the 10-year deficit period. As part of these stage one works, CBH propose to add an additional 243,005 tonnes of storage by constructing five new bulkheads which due to the location adds more tonnes closer to port resulting thereby enabling faster accumulation of tonnes during the peak shipping window. In addition to this, CBH also propose to undertake a number of upgrades to the site including adjustment of existing bulkhead frame lengths and the construction of a new de-tarpping area road.

## Proposal

The proposed development incorporates the following elements:

- Sealed internal roads to and around grain receipt and storage facilities connected to existing internal roads;
- Open bulkheads using 1.8m high wall frames on sealed pads fixed to a 2.2m wide strip of cement stabilised to 200 mm depth compacted gravel under the seal – totalling 223,355 tonnes of additional storage; and
- Storm water drains around the internal roads connected to the new storm water basin.

## Context and Land Use

The subject land is located within the City of Greater Geraldton. Access to the site is from the west via Arthur Road which is a local road under the City's operative planning scheme. The subject site is zoned rural under the City's Local Planning Scheme No. 1. The subject site is completely surrounded by rural zoned that accommodates a range of land uses being single houses or vacant rural land.

## Town Planning Considerations

The proposed development is considered to be consistent with Clause 68 of Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015 and the provisions of the City of Greater Geraldton Local Planning Scheme No. 1.

### Local Planning Scheme No. 1

The subject land is zoned rural under the Shire's Local Planning Scheme No. 1. The existing approved land use for the subject site is 'stockpiling' which is an 'A' use within Local Planning Scheme No. 1 meaning the use is not permitted unless the local government has exercised its discretion by granting development approval.

Stockpiling is defined as the '*temporary storage of raw or manufactured materials for a given purpose in an enclosed or an open environment*'. The proposed additions are an extension of this approved land use.

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 addition to an existing 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.

#### State Planning Policy 2.5 - Rural Planning

The proposed site expansion is consistent with State Planning Policy 2.5 'Rural Planning' which seeks to support existing primary production. CBH is an organisation owned and operated by its members, local growers. Expanding the network and increasing storage capacity of the site ensures the industry can support projected growth to provide investment and security for existing primary production landholdings. This expansion supports and promotes economic growth by ensuring farmers have sufficient storage facilities to cater for the expected growth and future yield of the industry.

#### City of Greater Geraldton Local Planning Strategy

The City of Greater Geraldton Local Planning Strategy has a desire to protect rural land from incompatible land uses. The CBH facility at Narngulu can only be considered an incidental and compatible land use to the local agricultural and primary production industry which is largely concentrated to rural zoned land. A strategy within the City of Greater Geraldton Local Planning Strategy is to ensure road infrastructure accommodates growing freight demands and has regard to community safety and community expectations. The Traffic Impact Statement included as an attachment to this proposal demonstrates that the existing road network is appropriate and traffic safety is maintained.

#### Site and Development Requirements

Clause 3.11.3 of LPS 1 details minimum site and development requirements for the rural zone. The minimum primary street setback is 20 metres and minimum side and rear boundary setback is 10 metres. The proposed bulkheads do not request a setback variation to these prescribed setbacks. The maximum building height is within that prescribed by Table 3 of the R-Codes. Further, the location of the proposed bulkheads falls outside of the minimum buffer distance prescribed in the Environmental Protection Authority's 'Guidance for the Assessment of Environmental Factors – Separation distances between industrial and sensitive land uses'. It is considered that the proposed addition will have no detrimental impact on the amenity on the locality and is therefore able to be supported.

Where a particular parking requirement for a use class is not specified, the local government shall determine the number of car parking bays, scooter / motorcycle bays, bicycle parking areas and end of trip facilities, to be provided having regard to the:

- nature of the proposed development;
- number of employees and visitors/clients to be associated with the development; and
- location of the parking spaces on the site and their effect on the amenity of adjoining development.

Regardless of whether the proposed bulkheads are constructed, the same, amount of delivery movements will occur. The effect of constructing the proposed additional bulkheads is that out loading movements during the busy harvest period are eliminated. The proposed development will not constitute additional employees, but merely change the way grain is stored and handled on site. Local demand and uncertain grain production are going to exist no matter the storage capabilities of a site. It is considered that additional car parking spaces are not required as part of this proposal.

### Neighbour Consultation

CBH is seeking to minimise any impact on the amenity of adjoining landowners, in relation to any noise and construction caused by the proposed development. As such, CBH requests that the City impose the following two conditions on any development approval issued by the City:

*'Prior to the commencement and post the delivery of development, a dilapidation report prepared by a suitably qualified professional shall be submitted to, and approved by, the City of Greater Geraldton, detailing the current condition and status of all buildings, surrounding paved areas and ancillary structures located on Lot 7 (No. 797) Edward Street, Narngulu.'*

*'Tonal reversing beepers are not to be fitted to any mechanical equipment or vehicles used during construction on the development site.'*

A CBH representative met with adjoining affected landowners to discuss the proposed site expansion. A letter attached to this submission was provided that detailed mitigations measures CBH was willing to undertake as part of this proposed development. At the time of the submission, it is understood adjoining landowners were supportive of the measures CBH were putting in place to mitigate potential impacts on amenity. Dust and noise management is discussed further below in this report.

### City of Greater Geraldton Local Planning Strategy

The identifies agriculture as the dominant industry sector in the Shire of Lake Grace and is expected to remain the most significant contributor to local economic activity. The proposed addition is incidental to an approved stockpiling land use which only assists to support the agriculture industry meaning the proposal does not compromise the objectives of the general agriculture zone and warrants approval accordingly.

### Stormwater Management

This strategy within the Stormwater Management Plan included as an attachment to this submission is to maintain the current situation which has been developed to suit the permanent and emergency bulkheads and adapted to suit this expansion. This involves:

- Installation of new and upgrading the existing open drains and culverts to cater for a 1:20 ARI design criteria to direct runoff from the expansion area to the existing constructed basin located in the southwest corner of the site.
- Installation of new, and upgrading the existing, open drains and culverts to cater for a 1:20 ARI design criteria to direct runoff from the proposed de-tarpping road to the existing natural basin that currently retains the emergency bulkhead stormwater runoff.
- Enlarging the existing constructed drainage basin to cater for the critical 1:20 ARI event (if required).
- Installation of a basin outlet drain to the existing constructed drainage basin to allow discharge of stormwater beyond the design criteria to protect the existing/proposed bulkheads and pavement backflow.

## Traffic Impact Assessment

A Traffic Impact Statement has been prepared for the proposed site expansion at the existing CBH Narngulu site and concluded the following:

- The estimated traffic generation can be accommodated within the capacity of the existing road network.
- The additional traffic generated by the site is not likely to increase the likelihood of crashes to unacceptable levels.
- Based on the geometry of the existing site exit, the available sight distance satisfies the minimum requirement outline in Austroads and MRWA RAV assessment guidelines.
- The surrounding road network has the appropriate RAV status for the proposed operation.
- Based on the estimated traffic volumes in the current, 2023 and 2033 assessment year, the site access is required to provide a Basic left turn treatment (BAL) and Basic right turn treatment (BAR) according to MRWA's Turn Warrant Assessment Calculator. Therefore, axillary lanes are not required at the existing access.
- Swept path analysis confirms that the existing site access and exit is considered acceptable for RAV10 and RAV7 truck movements.

This Traffic Impact Statement has been included as an attachment to this submission.

## Noise & Dust Management

CBH shall ensure that noise from the specification and installation of any mechanical equipment as well as traffic and construction noise does not exceed assigned levels prescribed in the *Environmental Protection (Noise) Regulations 1997*, when it is received at a neighbouring property. CBH undertakes frequent noise and dust monitoring across its sites to ensure that dust and noise levels are measured and are mitigated whenever there is an exceedance.

CBH undertakes frequent noise and dust monitoring at its Narngulu facility. The boundary monitor has recorded no dust exceedances however the measured noise levels have at times exceeded the assigned noise levels for the sensitive receptor across all time periods. The attended noise monitoring determined that it is unlikely that noise generated from normal site operations would exceed the assigned noise levels, and factors that likely contributed to the noise levels received at the boundary noise monitor were from meteorological influences, with the site experiencing winds in excess of 18km/h regularly, and the site being in the flight path for Geraldton airport.

A noise and dust management plan has been attached as an attachment to this submission.