

DS044B - Schedule of Submissions

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
Number	Submitter	Nature of Submission	Comment	Recommendation
1	Western Power	<p>Unfortunately requests for general comments, feedback and approval for proposals can't be provided for without a formal application.</p> <p>We suggest reviewing your query against the processes referred to in our Strategic Planning web page:</p> <ul style="list-style-type: none"> <li>• Using our provided mapping tools and Before You Dig Australia to locate any assets that may be affected by any proposed change or development,</li> <li>• Consider the proposal against our Products and Services,</li> <li>• If there are transmission assets in proximity to your work, applying via our move or remove transmission and communication assets form; and</li> <li>• Ensuring any developers involved are aware that they will need to make an application to deal with any assets that are in the development area as well as for the power requirements for the development.</li> </ul>	This is considered to be general development advice and the applicant will be advised accordingly.	No change be made to the amendment in response to this submission.
2	ATCO Gas	<p>No objection.</p> <ul style="list-style-type: none"> <li>• Anyone proposing to carry out construction or excavation works must contact <i>'Before You Dig Australia'</i></li> <li>• Proposed construction and excavation works need to be managed in accordance with the ATCO document Additional Information for Working Around Gas Infrastructure - AGA-O&amp;M-PR24</li> <li>• If the disconnection and/or removal of an ATCO gas service is required, a request can be submitted via the online ATCO portal found here.</li> </ul>	This is considered to be general development advice and the applicant will be advised accordingly	No change be made to the amendment in response to this submission.
3	Water Corporation	<p>No objection</p> <p>Water Corporation has no objection to this proposed development. It is noted that the applicant will be using groundwater to supply their</p>	Comments are noted.	No change be made to the amendment in response to this

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		processes and potable water requirements. This is required as while there is a water main in Geraldton-Mt Magnet Rd, it is a transfer main and is not available for use to supply customers directly.		submission.
4	Department of Energy, Mines, Industrial Regulation and Safety (DEMIRS)	No objection  DEMIRS has determined that this proposal raises no significant issues with respect to mineral and petroleum resources, geothermal energy, and basic raw materials.	Comments are noted.	No change be made to the amendment in response to this submission.
5	Department of Health	Water Supply and Wastewater Disposal <ul style="list-style-type: none"> <li>Wastewater disposal is required to comply with the Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974.</li> <li>All drinking water provided on site, especially relating to a food premises or food production, must meet the health-related requirements of the Australian Drinking Water Guidelines 2011.</li> <li>Any non-drinking water (e.g. water that is not intended or suitable for drinking) must be managed to ensure it cannot be confused with or contaminate the drinking water supply. This requires satisfactory labelling of non-drinking water taps and, depending on system configuration and suitable backflow prevention arrangements in accordance with Australian/New Zealand Standards AS3500 – Plumbing and Drainage.</li> </ul>	This is considered to be general development advice and the applicant will be advised accordingly	No change be made to the amendment in response to this submission.
		Chemical Hazards The site has not been classified as a C-RR, CRU, RRU as recorded on the Department of Water and Environmental Regulation's (DWER) Contaminated Sites database (CS Act 2003). However, although this site does not appear on DWER public access database, it may be subject to other important classifications not recorded on that database. The proponent should obtain a form 2- request for a summary of records in respect of land relating to the land and its surroundings to complete their assessment of the site's suitability for a rezoning to a more sensitive land use.	This is considered to be general development advice and the applicant will be advised accordingly	No change be made to the amendment in response to this submission.
		The proponent has conducted noise and dust in air modelling based	The Department of Health's comments relating	No change be

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		<p>on the proposed stack locations in the northwest of the site and has concluded that predicted plant emissions will not exceed air quality criteria beyond the boundary of Lot 40-41.</p> <p>Whilst DoH is prepared to accept the findings of the modelling, these should be underpinned and supported by appropriate emissions management measures.</p>	<p>to the acceptance of the noise and dust modelling is noted.</p> <p>Emissions management measures are relevant to the development application stage of this proposal</p>	<p>made to the amendment in response to this submission.</p>
6	Department of Water and Environmental Regulation	<p>DWER has identified that the proposal has the potential for impact on the environment and water resources, and the following advice is provided:</p> <p>As per the information provided in <i>Appendix E Environmental Impact Assessment</i>, this proposal was referred to the EPA in 2022. The EPA has determined not to assess the project, with the rationale that the environmental impact of this proposal can be managed through the regulatory processes of Part V of the <i>Environmental Protection Act</i>. DWER will work with the applicant to secure the appropriate approvals required for the construction and operation of the facility.</p> <p>The development application document states that there may be a requirement to clear vegetation. Under section 51C of the <i>Environmental Protection Act 1986</i> (EP Act), clearing of native vegetation is an offence unless:</p> <ul style="list-style-type: none"> <li>• it is undertaken under the authority of a clearing permit,</li> <li>• it is done after the person has received notice under Section 51DA(5) that a clearing permit is not required,</li> <li>• the clearing is subject to an exemption.</li> </ul> <p>Exemptions for clearing that are a requirement of written law, or authorised under certain statutory processes, are contained in Schedule 6 of the EP Act. Exemptions for low impact routine land management practices outside of environmentally sensitive areas (ESAs) are contained in the <i>Environmental Protection (Clearing of</i></p>	<p>Comments are noted.</p> <p>Comments are noted.</p> <p>This is considered to be general development advice and the applicant will be advised accordingly</p>	<p>No change be made to the amendment in response to this submission.</p> <p>No change be made to the amendment in response to this submission.</p> <p>No change be made to the amendment in response to this submission..</p>

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		<p><i>Native Vegetation) Regulations 2004 (the Clearing Regulations).</i></p> <p>The proposal site is located in the Greenough River surface water area and the Gascoyne groundwater area, both proclaimed under the Rights in Water and Irrigation Act.</p> <p>A licence is required from DWER to take surface or groundwater or to drill a bore.</p> <p>The proponent has been issued two licenses to abstract groundwater. These licenses will be managed through the DWER approved Water Resource Operating Strategy.</p>	<p>The assessment and approval of water use and allocation is undertaken by the Department of Water and Environmental Regulation (DWER).</p> <p>Water allocation approvals is not material planning consideration as part of the scheme amendment process.</p>	<p>No change be made to the amendment in response to this submission..</p>
7	Department of Biodiversity, Conservation and Attractions	<p>No objections</p> <p>It is anticipated that the proposed planning scheme amendments and any associated environmental impacts will be appropriately managed through the existing planning framework.</p>	<p>Comments are noted.</p>	<p>No change be made to the amendment in response to this submission..</p>
8	Main Roads WA	<p>Supports the scheme amendment subject to:</p> <ul style="list-style-type: none"> <li>• The proposed scheme text includes the additions under cl. 4.8.1 within Table 14 listed in your correspondence received 14 February 2024.</li> <li>• Any further rezoning, structure planning, subdivision, or development of land, which may have an impact on a primary distributor road should be referred to Main Roads and include a Traffic Statement or Assessment, as appropriate, in accordance with the WAPC's Transport Assessment Guidelines and Main Roads Driveway Policy. Main Roads suggests including information in the Local Planning Strategy to inform future development of the requirement.</li> </ul> <p>Main Roads has advised the SDAU on the conditions required to facilitate new access arrangements and upgrades to an existing road intersection for the proposed development.</p>	<p>The purpose of the scheme amendment is to insert the requirements listed within the resolution page into cl. 4.8.1 of the Local Planning Scheme.</p> <p>The requirement to consult with other authorities on future development proposals is already included within the general planning framework and is specifically required within the deemed provisions for local planning schemes.</p> <p>It is not considered that including this requirement within the City's Local Planning Strategy is warranted.</p> <p>Conditions relating to development of access arrangements and upgrading of roads are relevant to the development application process.</p>	<p>No change be made to the amendment in response to this submission.</p> <p>No change be made to the amendment in response to this submission.</p> <p>No change be made to the amendment in response to this submission.</p>

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9	Department of Primary Industries and Regional Development	<p>No objection</p> <p>The amendment report has adequately considered State Planning Policy 2.5 Rural Planning and assessed the potential impact on high quality agricultural land. Proposed licence and works approvals for the facility will minimise adverse impacts to neighbouring farming properties.</p> <p>DPIRD supports the subdivision and/or development requirements in relation to intersection road upgrades (5d), water (5e) and clearing of native vegetation (5e).</p> <p>The proposed site is located on the Eradu and Binu East subsystems. The environmental Impact Assessment (appendix e) recognises that “Both soil units have a high to extreme hazard potential for wind erosion”. The proposed mitigation measures, to be implemented during detailed design, construction and operations, should be sufficient to minimise potential impacts. The view that “Both soil units show no potential for water erosion hazards”, is not correct.</p> <p>The soils associated with these subsystems normally have a ‘nil to moderate’ risk of water erosion, when used for agricultural purposes. DPIRD is aware of sites where soils, which in a rural environment would normally be considered low risk of water erosion, have suffered serious erosion from constructed features (i.e. roads, pads) concentrating water flow. As a precautionary measure, DPIRD recommends managing surface water from this facility to mitigate water erosion during heavy summer or winter rainfall.</p> <p>In the future, when the processing plant is decommissioned and the site is being remediated for a final land use, DPIRD requests to be included in the consultation process as a stakeholder given this site is surrounded by ‘Rural’ land.</p>	<p>DPIRD comments relating to the consideration of SPP 2.5 and impact on high quality agricultural land is noted.</p> <p>Comments are noted.</p> <p>DPIRDs comments relating to the higher erosion potential for this soil type for non-agricultural purposes is noted.</p> <p>Conditions relating to stormwater management to prevent water erosion are relevant to the development application stage of this proposal.</p> <p>Conditions relating to decommissioning and site remediation are relevant to the development application stage of this proposal.</p>	<p>No change be made to the amendment in response to this submission.</p> <p>No change be made to the amendment in response to this submission.</p> <p>No change be made to the amendment in response to this submission.</p> <p>No change be made to the amendment in response to this submission.</p>

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10	Department of Fire & Emergency Services	<p>The referral for the above scheme amendment from the City did not include a Bushfire Management Plan. Comments provided within the planning report noting that SPP 3.7 can be assessed at future stages do not align with the Guidelines section 4.6.2 which states that BMP's should be prepared as early as possible in the planning process.</p> <p>DFES have provided a response to the SDAU which includes comments following assessment of the bushfire management plan. It is requested that both the BMP and these comments are include this as part of the assessment of the Scheme Amendment, to ensure that bushfire is considered at this stage.</p>	<p>As per the comments received by DFES, <i>State Planning Policy 3.7 Planning in Bushfire Prone Areas</i> requires strategic planning proposals to consider and address high order bushfire hazard.</p> <p>It is noted that a completed BMP was submitted by the applicant as part of the development application to the SDAU.</p> <p>Table 3.5 within the scheme amendment report should be updated with an outline of the recommendations of the BMP relevant to the strategic planning phase (including any changes required as per DFES comments). This update should also address how any relevant recommendations have been met by the scheme amendment.</p>	The amendment be modified to update Table 3.5 with any relevant Bushfire Management Plan recommendations and detail how these have been addressed.
11	Local resident	<p>Object</p> <p>Issues raised within submission relate to:</p> <ul style="list-style-type: none"> <li>• Treatment of first nations people within Australia and impacts of health, living standards and family connections,</li> <li>• Concerns that valuable first nations items held in museums around the world be returned to the people.</li> <li>• Object to the Australian and Aboriginal flag and national anthem given concerns that they do not represent first nations people.</li> <li>• Statements that foreign ruling systems are not lawful authorisation.</li> <li>• Requests that local children administered by the child protection system be returned to their families.</li> </ul>	Without prejudice to the issues raised as part of this submission, the rezoning of land through the local planning framework is not the appropriate avenue for addressing these concerns.	No change be made to the amendment in response to this submission.
12	Local resident	Object	The applicant has provided an Environmental	The amendment

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		<p>A processing vanadium facility should not be located in close proximity to farming areas which grow food and stock sheep. Agricultural production is just as important as mining and minerals processing.</p>	<p>Impact Assessment and made statements that investigations have confirmed that no impacts from the processing plant will encroach beyond the property boundaries of Lots 40 &amp; 41.</p>	<p>be modified to update Section 3.1 of the report to appropriately demonstrate through technical assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>
		<p>We use the underground water for the sheep to drink and are concerned about the impacts.</p>	<p>However, it is considered that the assessment of the impact area, has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 2.5 and 4.1.</p> <p>It must be demonstrated and confirmed that there is no loss of agricultural productivity to the surrounding land given the area is specifically used for food production.</p> <p>This should determine a suitable separation distance from the plant to any sensitive land use (including land for food production) and whether any statutory buffers are required to be included as part of the rezoning.</p> <p>The scheme amendment report details that the proposed processing plant will source groundwater from the Irwin River-High Cliff Aquifer located over 200m below ground level.</p> <p>Agricultural land uses in the area will continue to use the shallow superficial aquifer located approximately 20m below ground level.</p> <p>The assessment and approval of water use and allocation is undertaken by the Department of Water and Environmental Regulation (DWER).</p>	<p>No change be made to the amendment in response to this submission.</p>

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			Water allocation approvals is not material planning consideration as part of the scheme amendment process.	
13	Local landowner, resident & business owner	<p>Object</p> <p>The Umwelt document submitted as part of the EPA referral process, is full of omissions and mistruths, being;</p> <ul style="list-style-type: none"> <li>• landholders list does not include all landholders in this area who will be affected by this facility,</li> <li>• consultation was not extensive,</li> <li>• our position was misrepresented; and</li> <li>• landowners were unaware that the EPA submission process or ability to comment.</li> </ul> <p>Consultation with the proponents was not as extensive as was stated with the amendment report. Based on one quick meeting in 2018 and never heard back.</p> <p>The map of homesteads in the vicinity of the facility has been altered with at least nine homesteads removed or omitted from this map.</p>	<p>Without prejudice to the issues raised as part of this submission, the EPA assessment process sits within separate legislation outside of the <i>Planning and Development Act 2005</i> and the <i>Planning and Development (Local Planning Scheme) Regulations 2015</i>.</p> <p>This preliminary consultation sits outside of the required statutory consultation process dictated by the <i>Planning and Development (Local Planning Scheme) Regulations 2015</i>.</p> <p>The implied community support and comments stated within the report, whether correct or not, are not considered as part of the assessment of the rezoning.</p> <p>Figure 1.6 of the scheme amendment report does appear to exclude a number of residences (notated on the map as ‘receptors’) from the surrounding area. Particularly the two residences most closely located to the proposed site.</p> <p>Figure 1.6 should be correctly updated.</p> <p>Figure 4 within the Environmental Impact</p>	<p>No change be made to the amendment in response to this submission.</p> <p>No change be made to the amendment in response to this submission.</p> <p>The amendment be modified to update Figure 1.6 to identify the correct number and location of surrounding residences and homesteads.</p>



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			Assessment included as Appendix F does appear to include the correct number and location of homesteads.	
		The report states that the nearest homestead is 3.2km away being Wyalong when in fact it is only 1.2km away and on the adjacent property.	<p>The report does state a number of times within Table 3.4 that the closest sensitive human receptor is Wyalong homestead being 3.2km from the proposed site.</p> <p>As per the submission, this is incorrect and needs to be updated.</p> <p>Other sections of the report correctly identify closer sensitive receptors.</p>	The amendment be modified to correct references within the report stating that Wyalong homestead is the closest sensitive receptor.
		The Midwest agricultural industry relies heavily on the same underground water source that the processing plant is intending to access. If the quality or quantity of this water were to change it could have a devastating impact of the farming practises in this area i.e. farmers use this water for stock, spraying, human consumption.	<p>The scheme amendment report details that the proposed processing plant will source groundwater from the Irwin River-High Cliff Aquifer located over 200m below ground level.</p> <p>Agricultural land uses in the area will continue to use the shallow superficial aquifer located approximately 20m below ground level.</p> <p>Water allocation approvals is not material planning consideration as part of the scheme amendment process.</p>	No change be made to the amendment in response to this submission.
		The groundwater in this area is only 25.27m below ground level so there is a real risk of ground water contamination from their environmentally hazardous industrial waste.	The management of waste and water run-off associated with the proposed processing plant are dealt with via the development application process and additionally the DWER works approval process.	No change be made to the amendment in response to this submission.
		It is alarming is that Rockwater Pty Ltd, who was commissioned to do AVL's water exploration, still endorsed the water license based on no real information obtained as to what is an environmentally safe and	The assessment and approval of water use and allocation is undertaken by the Department of Water and Environmental Regulation	No change be made to the amendment in

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		<p>sustainable level of extraction.</p> <p>Given this plant will be operational for the next 25-100 years it will have a massive impact on this groundwater source and they are saying they will basically just see how the water extraction goes and make adjustments as needed – which we all know will not occur once production has commenced, as it will stall mining production and profit. (ref: supporting documentation from Rockwater Hydrogeology report to the EPA by AVL)</p>	<p>(DWER).</p> <p>Water allocation approvals is not material planning consideration as part of the scheme amendment process.</p>	<p>response to this submission.</p>
		<p>Road network deterioration and safety.</p> <p>Geraldton – Mt Magnet Road is already struggling to be maintained in a safe condition under the pressure of the mining trucks already using it from the mines east of Mullewa.</p> <p>Increased heavy and light vehicles would make this road far more unsafe than it already is.</p> <p>We use this road to haul our grains to port for export and an increase in movements on this road would negatively impact our efficiencies to carry out this important activity in our business.</p>	<p>Geraldton Mt Magnet Road is a 300km state route connecting rural producers and mining operations over an extensive area to Geraldton. Operations along this route, and beyond, are anticipated to grow, increasing usage of the road.</p> <p>Main Roads WA is the responsible authority for managing use of the road and ensuring that it remains fit for purpose.</p> <p>In requesting their comment, Main Roads WA has supported the proposal subject to the application of access requirements and conditions via the SDAU process.</p>	<p>No change be made to the amendment in response to this submission.</p>
		<p>Our business already has huge issues recruiting and retaining employees and our wages have gone up 150% in the last 2 years due to the competition with the mines further east of Mullewa. This proposed processing plant would make this issue even larger as we could never compete with the wages that they would offer employees right on our doorstep. We already must look overseas to bridge the skills shortage and sponsor employees to work on our farms.</p>	<p>Access to and competition for employees is not considered a material planning consideration.</p>	<p>No change be made to the amendment in response to this submission.</p>
		<p>There is an unknown impact of the dust emissions on all surrounding crops and what impact this will have on the quality of grain that is delivered to the port of Geraldton and the subsequent economic</p>	<p>The applicant has provided an Environmental Impact Assessment and made statements that investigations have confirmed that no impacts</p>	<p>The amendment be modified to update Section 3.1</p>

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		<p>impact. If a load is assessed with contaminants, then farmers will stand to lose thousands of dollars per truck load. There are already tight regulations on what chemicals we can use on the grain we produce that is all exported.</p> <p>These new contaminants from this facility could negatively affect the export quality of the grain produced in this area and ruin WA's reputation for growing some of the best quality grain in the world.</p>	<p>from the processing plant will encroach beyond the property boundaries of Lots 40 &amp; 41.</p> <p>However, it is considered that the assessment of the impact area, has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5.</p> <p>It must be demonstrated and confirmed that there is no loss of agricultural productivity to the surrounding land given the area is specifically used for food production.</p> <p>This should determine a suitable separation distance from the plant to any sensitive land use (including land for food production) and whether any statutory buffers are required to be included as part of the rezoning.</p>	<p>of the report to appropriately demonstrate through technical assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>
		<p>The change of land use from 'Agricultural' to 'General Industry' would negatively impact on the value of premium agricultural land in the area.</p> <p>All neighbouring landholders would see a negative impact on their land values as there are so many unknowns of farming adjacent a processing plant of this size. Our land will be de-valued and impact our businesses profitability negatively.</p> <p>Agricultural land is experiencing one of the largest increases in value seen in many years due to the current economic climate and the environmental fact that there is just no more agricultural land to be cleared – ever. This coupled with an exploding world population to feed is exacerbating this problem.</p>	<p>Generally, loss of land values due to development is not a material planning consideration.</p> <p>However, this concern is centred around loss of land productivity from the impacts and emissions from proposed industrial land use.</p> <p>The applicant has provided an Environmental Impact Assessment and made statements that investigations have confirmed that no impacts from the processing plant will encroach beyond the property boundaries of Lots 40 &amp; 41.</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural</p>

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			<p>It is considered that the assessment of the impact area, has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5.</p> <p>It must be demonstrated and confirmed that there is no loss of agricultural productivity to the surrounding land given the area is specifically used for food production.</p> <p>This should determine a suitable separation distance from the plant to any sensitive land use (including land for food production) and whether any statutory buffers are required to be included as part of the rezoning.</p>	<p>Planning and State Planning Policy 4.1 – Industrial Interface.</p>
		<p>Rezoning this land would set a precedence for other major green energy and oil &amp; gas companies in the area.</p> <p>The City has highlighted that they need to find an alternate industrial zone due to Narngulu and Oakajee nearing capacity. It would be detrimental to the Agricultural industry to develop an industrial zone in the middle of prime agricultural land that contributes millions of dollars to the region.</p> <p>Other areas that a far less profitable and vital to our local economy could be rezoned for this purpose.</p>	<p>City is aware of the increasing interest from industries wanting to locate in the eastern periphery given that zoned industrial land in Geraldton and the region is not currently fit for purpose.</p> <p>The City is currently undertaking the Future Industrial Land Project which proposes to identify strategic locations for industry to prevent ad-hoc proposals. The project has a focus on balancing the need for additional zoned industrial land against the impact on high yielding agricultural land.</p>	<p>No change be made to the amendment in response to this submission.</p>
		<p>The WA State Planning Strategy 2050 document clearly outlines on page 54, “existing and future land suitable for food production is identified and protected from encroachment and further fragmentation”.</p>	<p>The State Planning Strategy provides planning principles, strategic goals and objectives which are used as a basis to find synergies between competing, complex and often inter-related land use planning issues.</p>	<p>No change be made to the amendment in response to this submission.</p>

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		<p>This proposal does not achieve this outcome.</p> <p>There is little to no economic benefit to the township of Mullewa as part of this project. There can be no benefit to a small town of 350 when there is no housing, and the current services and facilities only just suffice the population it has now.</p> <p>The mentioned 400 people workforce required to establish the facility and then 140 to run the facility will struggle to find housing even in Geraldton. This workforce will become fly-in, fly-out with no economic benefit to the Mullewa community.</p> <p>This project has already created community divide and social unrest due to the unethical community consultation approach of AVL. Even if this project does not go ahead there is a divide that has already began that will never be fixed. These large companies do not care about our small communities and how they function or not.</p>	<p>The proposed rezoning attempts to find a balanced position between meeting requirements for securing and protecting agricultural land and supporting the growth and development of the resource sector. Both being key objectives of the State Planning Strategy.</p> <p>Encroachment of impacts from the proposal land use will be confirmed.</p> <p>Access to housing is an Australia wide issue. State and federal agencies along with the City and other community groups are currently tackling this issue.</p> <p>Support for industry, development and general growth will provide opportunities for investment for basic services.</p> <p>These observations are noted.</p>	<p>No change be made to the amendment in response to this submission.</p> <p>No change be made to the amendment in response to this submission.</p>
14	On behalf of local landowner, resident & business owner	<p><b>Object</b></p> <p>The two homesteads located on the adjacent farming property are located 1,500 and 1980m from the closest boundary of the proposed site.</p> <p>Both homesteads are located in the direct path downwind of the prevailing easterly and southerly winds.</p>	<p>The assessment of potential impacts from the proposed industrial land use is guided by State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p> <p>From these policy frameworks it is intended that potential emissions would be confirmed via</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical</p>

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		<p>The adjacent farming property boundary fence is 122 metres from the proposed solar array and 472 metres from the processing plant development site.</p> <p>Concerned regarding the noise, dust, light, visual and airborne contamination that will be experienced by the dwellings.</p>	<p>technical assessment and appropriately modelled and demonstrated. This would provide surety as to the potential impacts on surrounding land and sensitive land uses. It also confirms whether any buffer or separation distances are required to be protected via a statutory mechanism within the City's Local Planning Scheme.</p> <p>The applicant has provided an Environmental Impact Assessment and made statements that investigations have confirmed that no impacts will encroach beyond the property boundaries of Lots 40 &amp; 41. It is considered that this does not meet the requirements of SPP 2.5 and SPP 4.1 in appropriately demonstrated this through the provision and evidence of technical assessment.</p> <p>A visual impact assessment was included within the SDAU development application report but focused only on viewsheds from Geraldton Mt Magnet Road and not from adjacent property.</p> <p>It is considered that visual amenity concerns and light impacts should be addressed as part of the development application process.</p>	<p>assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>
		<p>Plans for a new home to be located nearby the closest homestead, have been completed and finance approved for construction in 2024. However, progress has been suspended pending the outcome of the processing plant.</p>	<p>Under the adjacent 'Rural' zone it is a permissible for additional housing to be established in close proximity to the proposed processing plant.</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate</p>

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			<p>Certainty over the necessary separation distances/ buffers of the proposed industrial land use is required to confirm whether additional statutory mechanisms within the Scheme are required which would restrict any encroachment.</p> <p>This assessment not only protects adjacent land holdings and uses but ensures that the proposed industrial land uses are protected and not prevented from full operation.</p>	<p>through technical assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>
		<p>The Proposed Plant will be constructed adjacent and up wind to a property producing food for human consumption in WA and overseas. The potential for contaminants to be released into surrounding agricultural land has not been adequately addressed or addressed at all given the potential significant impact. The processing of vanadium is not compatible with crop growing.</p> <p>Food production is subject to strict biosecurity, chemical residue and traceability certifications.</p> <p>The location of the processing plant, in a rural zone, will risk the ability for food growers in the area to access markets for human consumption.</p>	<p>The applicant has provided an Environmental Impact Assessment and made statements that investigations have confirmed that no impacts from the processing plant will encroach beyond the property boundaries of Lots 40 &amp; 41.</p> <p>However, it is considered that the assessment of the impact area, has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5.</p> <p>It must be demonstrated and confirmed that there is no loss of agricultural productivity to the surrounding land given the area is specifically used for food production.</p> <p>This should determine a suitable separation distance from the plant to any sensitive land use (including land for food production) and whether any statutory buffers are required to</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>

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		<p>Significant assets have been invested into the neighbouring agricultural business and there are concerns regarding the impact on economic viability for us and neighbouring agricultural businesses.</p> <p>Adjacent farm expanded over time to current scale of 6,558 arable hectares. It is a profitable commercial venture recognised as a leader in innovative farming practices and is host to research and development trials and programs.</p> <p>The infrastructure required to operate a successful modern farm is extensive and significant decision support services are required to operate the business at peak profitability.</p>	<p>be included as part of the rezoning.</p> <p>The applicant has provided an Environmental Impact Assessment and made statements that investigations have confirmed that no impacts from the processing plant will encroach beyond the property boundaries of Lots 40 &amp; 41.</p> <p>However, it is considered that the assessment of the impact area, has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5.</p> <p>It must be demonstrated and confirmed that there is no loss of agricultural productivity to the surrounding land given the area is specifically used for food production.</p> <p>This should determine a suitable separation distance from the plant to any sensitive land use (including land for food production) and whether any statutory buffers are required to be included as part of the rezoning.</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>
		<p>Canola produced on the adjacent property can only be exported to the premium EU market without discount if it is accompanied by current International Sustainability for Carbon Certification (ISCC).</p> <p>ISCC is an internationally recognised sustainably accreditation system that supports sustainable, traceable, climate-friendly supply chains. The property is certified as compliant and passed independent audits in 2016 and 2023.</p> <p>To remain in the ISCC EU/Plus program, the property must:</p>	<p>The applicant has provided an Environmental Impact Assessment and made statements that investigations have confirmed that no impacts from the processing plant will encroach beyond the property boundaries of Lots 40 &amp; 41.</p> <p>However, it is considered that the assessment of the impact area, has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5.</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical assessment and modelling the applicable impact area, separation distance and buffer</p>



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		<p>(a) sign an annual self-declaration that it meets and complies with sustainable and responsible farm practice principles;</p> <p>(b) undergo randomly selected annual on-farm audit by an ISCC certification body;</p> <p>(c) demonstrate compliance by providing evidence and documentation that crops are grown using environmentally responsible practices;</p> <p>(d) prove no land conversion (ie clearing of land);</p> <p>(e) provide farm records for responsible chemical and fertilizer applications, contractual supply chain agreements, crop records and history;</p> <p>(f) undertake responsible waste disposal;</p> <p>(g) provide safe and environmentally responsible storage of chemicals in accordance with ISCC requirements;</p> <p>(h) provide safe work conditions through work, health and safety compliance and staff training; and</p> <p>(i) demonstrate soil conservation, erosion prevention, preservation of soil structure, protection of natural water courses and protection of groundwater</p> <p>If the property cannot meet all of the required ISCC principles each year, it cannot participate in the ISCC program or export any canola from any part of the broader farming land to the premium EU market without significant price penalties.</p>	<p>It must be demonstrated and confirmed that there is no loss of agricultural productivity to the surrounding land given the area is specifically used for food production.</p> <p>This should determine a suitable separation distance from the plant to any sensitive land use (including land for food production) and whether any statutory buffers are required to be included as part of the rezoning.</p>	<p>zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>
		<p>The proposed processing plant will render the adjacent property as non-compliant with ISCC principle 2.6.2, regarding the protection of ground water.</p> <p>Under ISCC principle 2.6.2, several pesticides are prohibited from being applied aerially within 500 metres of water bodies The proposed location of the storm water body is 189 metres from the nearest crop.</p>	<p>The applicant has provided an Environmental Impact Assessment and made statements that investigations have confirmed that no impacts from the processing plant will encroach beyond the property boundaries of Lots 40 &amp; 41.</p> <p>However, it is considered that the assessment of the impact area, has not been appropriately</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical assessment and modelling the</p>

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		<p>In order to undertake aerial spraying of canola and remain compliant with the ISCC program, a minimum 500 metre separation between the crop and a water source is required. This distance protects against groundwater contamination.</p> <p>Aerial spraying is the most timely, cost effective and yield preserving method to manage pests and foliar diseases. If the property cannot meet all of the required ISCC principles each year, it cannot participate in the ISCC program or export any canola from any part of the broader farmland to the premium EU market without significant price penalties.</p>	<p>demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5.</p> <p>It must be demonstrated and confirmed that there is no loss of agricultural productivity to the surrounding land given the area is specifically used for food production.</p> <p>This should determine a suitable separation distance from the plant to any sensitive land use (including land for food production) and whether any statutory buffers are required to be included as part of the rezoning.</p>	<p>applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>
		<p>Page 16 of the report states that Lots 40 and 41 are in an area of transitional agricultural quality for broadacre cropping and is of moderate to high quality.</p> <p>The land on Lots 40 and 41 is considered by local residents as variable regarding its agricultural capability. Specifically, this area is a keenly sought after and within a tightly held farming district.</p> <p>Land capacity was previously considered a function of soil type and rainfall zone. However, in current times, land capability is largely a function of investment in soil remediation, including lime sand applications and incorporation of lime into the subsoil profile via deep ripping operations.</p> <p>The business model of grain producers principally involves converting growing season rainfall into tonnes of grain. This process is measured in terms of kilograms of grain produced per hectare per millimetre of growing season rainfall and is referred to as water use efficiency. Therefore, land capability is a function of landowner investment decisions and operating proficiency.</p>	<p>The applicant has only used the generic mapping produced by Department of Agricultural and Food to determine the suitability of the site for agricultural purposes. No specific on ground assessment of the actual site was conducted to ascertain the agricultural productivity of the site.</p> <p>Comments made by residents regarding the general understanding of the productivity of this area given technological inputs are fair.</p> <p>The scheme amendment report provides an assessment in accordance with SPP 2.5 – Rural Planning of the extent of agricultural land loss due to the development. It calculated that less than 0.02% of available good to medium quality agricultural land within the Midwest Region would be lost.</p> <p>Concerns that the emissions of the proposed industrial land use will not be contained within</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>

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		<p>Section 3.1 (at page 19) of the Amendment 18 Report states that the Proposed Site comprises less than 0.02% of available good to medium quality agricultural land within the region and relies on this as a basis for the Proposed Plant being approved. The term 'region' however is undefined.</p> <p>This argument however misses the point. Not only will limited agricultural activity, if any, be undertaken on the Proposed Site, the Proposed Plant will likely adversely affect adjacent land and nearby properties. If this occurs, the amount of agricultural land that will be unavailable for use or limited in its use, will be greater than 0.02%.</p> <p>Given that the land the subject of the Proposed Site is zoned rural, is capable of producing primary products and such land is finite, it would be unwise to allow a use of rural land that is not for an agricultural purpose and further, may contaminate the agricultural land upon which it operates and possibly the surrounding agricultural land and water resources.</p>	<p>its boundaries and impact the agricultural productivity are warranted. This could potentially affect the calculation of affected agricultural land.</p> <p>Confirmation of the impact area and separation distances for the proposed land use is necessary.</p>	
		<p>In order to continually refine and improve crop yields and the quality and quantity of produce from the location, the owners have undertaken significant research and development, for example assisting the Department of Primary Industries and Regional Development (DPIRD) with soil remediation strategies, soil microbial activity trials, long term soil potash cycling trial, implementation of automated variable rate technology for chemical and fertiliser application, implementation of controlled traffic farming, annual soil nutrient and acidity testing for optimisation of applied plant nutrition strategies and revegetation of approximately 120 hectares of salt-affected land (in conjunction with LandCare grant funding).</p> <p>This research and development has contributed to the ongoing success of the adjacent farming land and to the broader WA grains</p>	<p>As stated previously is considered that the assessment of the impact area, and required separation distance from the proposed industrial land use has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5.</p> <p>This will confirm whether any statutory buffers are required to be included as part of the rezoning and will ensure the continuation of existing agricultural activities on adjacent land.</p>	<p>No change be made to the amendment in response to this submission.</p>

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		<p>industry as a whole.</p> <p>Although it is evident that zonings by local and state governments are reflective of the land use, zonings are also reflective of the capacity of the land. That is, a particular area of land would likely be zoned rural / agricultural because that land is capable of producing a primary product. By the same token, it would be a nonsense to zone an area of land agricultural if there was no possibility that the land could produce a primary product. On this analysis, the amount of land that can be zoned rural or agricultural is finite. Similarly, land that is capable of hosting mining and its associated activities is also likely finite as there are areas in WA which do not host minerals.</p>	<p>The zoning of land in rural areas occurs broadly without detailed on-ground investigations as to the productivity of the land. The productivity of land within the Rural Zone varies greatly across the City area. There is no direct correlation between land being in the Rural Zone and its productivity level.</p> <p>An important part of the planning framework is the ability to amend zoning and ability to develop land based upon an informed understanding of the benefits and risks.</p>	<p>No change be made to the amendment in response to this submission.</p>
		<p>The amendment report references the State Planning Strategy 2050 and identifies the following five key issues of strategic importance to the ongoing growth of WA:</p> <ul style="list-style-type: none"> <li>(a) <i>economic development;</i></li> <li>(b) <i>physical infrastructure;</i></li> <li>(c) <i>social infrastructure;</i></li> <li>(d) <i>environment; and</i></li> <li>(e) <i>security.</i></li> </ul> <p>'Economic development' identifies the following elements to be developed in order to support the economic development of WA:</p> <ul style="list-style-type: none"> <li>(a) <i>the resources economy (the stated objective is to maintain and grow WA as the destination of choice for responsible exploration and development of resources);</i></li> <li>(b) <i>education, training and knowledge transfer;</i></li> <li>(c) <i>tourism;</i></li> <li>(d) <i>agriculture and food (the stated objective to is to enable the State's food supply chains to meet</i></li> </ul>	<p>The State Planning Strategy provides planning principles, strategic goals and objectives which are used as a basis to find synergies between competing, complex and often inter-related land use planning issues.</p> <p>The proposed rezoning attempts to find a balanced position between meeting requirements for securing and protecting agricultural land and supporting the growth and development of the resource sector. Both being key objectives of the State Planning Strategy.</p> <p>The scheme amendment report provides an assessment in accordance with SPP 2.5 – Rural Planning of the extent of agricultural land loss due to the development. It calculated that less than 0.02% of available good to medium quality agricultural land within the Midwest Region would be lost.</p>	<p>No change be made to the amendment in response to this submission.</p>

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		<p><i>the projected demands of its domestic and global food and fisheries market);</i></p> <p><i>(e) remote settlements; and</i></p> <p><i>(f) land availability.</i></p> <p>The proponent sets out how the proposed rezoning will support the ‘resources economy’ strategy however, the ‘agriculture and food’ strategy element of the SPS, being an equally important element is overlooked.</p> <p>In particular, the agriculture and food strategy states that:</p> <p><i>(a) “The importance of food sources is growing throughout the world, as demand begins to outstrip supply and opportunities emerge to supply domestic and foreign markets.”</i></p> <p><i>(b) “In Western Australia, food production capacity is important, not just for the local market, but also for a range of export markets, with the State exporting 80% of its agricultural production.”</i></p> <p><i>(c) “The demand for food will grow with the population, making the protection of existing and potential food production areas and their power and water supply essential, especially for those supplying more perishable food products.”</i></p> <p><i>(d) “Western Australia is an important producer and exporter of high-quality grains, wool, meat, live animals and fish; it also imports a substantial quantity of food: 80% of its processed foods and 100% of its sugar, yeast, preservatives and packaging.”</i></p> <p><i>(e) “The State’s economy has long been supported by businesses that produce, process, distribute and market food products such as grain, wool, meat, wine and seafood. Western Australia exports 80% of the State’s agricultural production and has a reputation for safe, high quality goods in overseas markets.”</i></p> <p><i>(f) “Future local access to fresh food, derived from a well-managed environment, is important to sustaining healthy and liveable communities. A competitive and diversified food sector is a vital</i></p>		

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		<p><i>component of future economic development.”</i></p> <p><i>(g) “To meet the food demands of a growing world population, global agricultural production will need to double by 2050.”</i></p> <p>In addition, table 6 (at page 54) of the SPS states that with respect to prime agricultural land, the proposed outcome for 2025 is that existing and future land suitable for food production is identified and protected from encroachment and further fragmentation.</p> <p>An objective of the ‘land availability’ strategy is that measures will be in place to secure land for future agricultural and food industry production, with a strong presumption in favour of the sustainability of prime agriculture land.</p> <p>With respect to the challenges of the land availability strategy, the SPS states that “structure planning and local planning schemes will ensure that strategic land assets, such as agricultural land, industrial lands, conservation areas and mineral and petroleum resources maintain their optimal potential” (see page 62).</p>		
		<p>Section 3.1 (at page 21) of the Amendment 18 Report discusses the separation distances (buffer zones) between industrial and sensitive land uses. Table 3.3 of the Amendment 18 Report provides that for processing works where greater than 1,000 tonnes per year of a concentrate is produced, the buffer is on a case-by-case basis depending on the process.</p> <p>Page 22 states that the proponent has undertaken modelling of noise, dust and particulates and found that there would be no exceedance of relevant environmental air quality beyond the boundaries of the Proposed Site. As such the proponent considers there are no requirements for planning controls beyond the boundaries of the Proposed Site.</p>	<p>The EPA provides two documents guiding proposed separation distance between industrial and sensitive land uses.</p> <p>The current document (2005) classes the processing plant as part of the ‘vanadium mining/processing’ and states that the separation distance is 1,500-3,000m. It is acknowledged that this classification does not reflect the activities proposed to be undertaken on site.</p> <p>The draft document (2015) classes the plant within the “Metal smelting, refining, melting,</p>	<p>The amendment be modified to;</p> <p><u>Part A</u> Update Section 3.1 of the report to appropriately demonstrate through technical assessment and modelling the applicable impact area, separation distance and buffer</p>

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		<p>Based on the proximity to nearby homesteads this is unacceptable.</p> <p>Significantly, the map at figure 1.6 (at page 22) does not include two adjacent homesteads, being the closest residences to the Proposed Plant.</p> <p>Given that the proponent has not included the closest residence on the map, it is likely that the proponent has not considered the effects of the Proposed Plant in its modelling of noise, light, dust and particulars. In this respect, the basis upon which the proponent purports that there will be exceedances and no requirements for planning controls is flawed.</p>	<p>casting, fusing, roasting or processing works” and where the processing is greater than 1000 tonnes per year a ‘case by case’ buffer assessment is required.</p> <p>The applicant has provided an Environmental Impact Assessment and made statements that investigations have confirmed that no impacts will encroach beyond the property boundaries of Lots 40 &amp; 41.</p> <p>However, it is considered that the applicant has not appropriately demonstrated this through the provision and evidence of technical assessments. This should be provided to adequately ensure that the separation distance is suitable and if any buffers are required.</p> <p>Figure 1.6 of the scheme amendment report does indicate a number of residences (notated on the map as ‘receptors’) missing from the surrounding area.</p> <p>Figure 1.6 should be appropriately updated.</p>	<p>zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p> <p><u>Part B</u> Update Figure 1.6 to locate the residences missing from the area.</p>
		<p>Table 3.4 (at page 24) of the Amendment 18 Report discusses the classification of the relevant environmental factors and identifies the likely environmental impacts from the Proposed Plant. This table includes inaccuracies and possible misrepresentations as set out below.</p> <p>Under the ‘air’ category (at page 26), the table includes the statement that “the closest sensitive human receptor is Wyalong Homestead,</p>	<p>Yes, the report does state a number of times within Table 3.4 that the closest sensitive human receptor is Wyalong homestead being 3.2km from the proposed site.</p> <p>This is incorrect and needs to be updated.</p>	<p>The amendment be modified to correct statements within Table 3.4 which state Wyalong homestead is the closest sensitive</p>

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		<p>3.2 km from the Proposal.” This statement is incorrect.</p> <p>The closest sensitive human receptor to the Proposed Plant are two homesteads on adjacent land to the west being 1,500 metres and 1,980m from the boundary of the Proposed Site. Given this misrepresentation and the differing wind directions and velocities that this adjacent land is exposed to relative to Lots 40 &amp; 41 the statement that “no buffers are required outside the boundaries of the proposed lots” cannot be relied upon.</p> <p>Under the ‘people – human health’ category (at page 27), the table includes the statement that “the closest sensitive human receptor is Wyalong Homestead, 3.2 km from the Proposal.” As stated above, this is incorrect.</p>		receptor.
		<p>Pages 30 and 31 of the Amendment 18 Report discuss the objectives of the ‘general industry’ zone under the City’s local planning scheme. One of the objectives of the local planning scheme is to “provide for a broad range of industrial, service and storage activities, which by the nature of their operations, should be isolated from residential and other sensitive land uses”.</p> <p>The adjacent property which includes two residential premises in addition to workers’ accommodation and numerous sheds, workshops and storage facilities are located in close proximity to the proposed processing plant. The Proposed Plant is by no means isolated from residential land uses which are sensitive to emissions and the impact of amenity from an industrial operation.</p>	<p>This comment is centred around concerns that impacts from the proposed industrial zone and land use will result in loss of land productivity and amenity.</p> <p>As stated previously is considered that the assessment of the impact area, and required separation distance from the proposed industrial land use has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5.</p> <p>This will confirm whether any statutory buffers are required to be included as part of the rezoning and will ensure the continuation of existing agricultural activities on adjacent land and maintenance of appropriate amenity standards.</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>



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		<p>The Proposed Plant is a mining operation being conducted in an agricultural region without the usual legislative protections that would apply to a mining operation (including appropriate approvals and compensation provisions).</p>	<p>The proposed plant falls within the definition of an “Industrial” land use within the City’s Local Planning Scheme.</p>	<p>No change be made to the amendment in response to this submission.</p>
		<p>Concerned that the impact on air quality will affect the availability of skilled permanent and seasonal labour.</p> <p>Prospective employees interview a number of farm businesses prior to deciding which business to work for and the presence of unsightly industrial infrastructure close by to accommodation and sheds and workshops will cause the location to be seen as an unfavourable farm on which to work.</p> <p>If labour is difficult to source and retain, timeliness of operations, and therefore crop yields and business profitability will be severely affected.</p>	<p>Access to and competition for employees is not considered a material planning consideration.</p> <p>This comment is centred around concerns that impacts from the proposed industrial zone and land use will result in loss of land productivity and amenity.</p> <p>As stated previously is considered that the assessment of the impact area, and required separation distance from the proposed industrial land use has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5.</p> <p>This will confirm whether any statutory buffers are required to be included as part of the rezoning and will ensure the continuation of existing agricultural activities on adjacent land and maintenance of appropriate amenity standards.</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>
		<p>Section 1.4 of the Amendment 18 Report sets out the reasons for the location of the Proposed Plant on the Proposed Site. One of the reasons cited is “greater plant operating and transport economies to AVL”.</p> <p>Whilst it is understood that projects such as the Proposed Plant must be economically viable, it is the surrounding landholders that will</p>	<p>This comment is centred around concerns that impacts from the proposed industrial zone and land use will result in loss of land productivity and amenity.</p> <p>As stated previously is considered that the assessment of the impact area, and required</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical</p>

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		<p>carry many of the 'costs' of the economies that AVL will gain from the location of the Proposed Plant.</p> <p>Whilst the proponent enjoys the profits from the Proposed Plant, adjacent properties will experience income losses, operational inefficiencies and amenity reduction. In addition, any purported benefits to the local community will be offset by the financial and amenity losses experienced by those neighbouring farmlands.</p>	<p>separation distance from the proposed industrial land use has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5.</p> <p>This will confirm whether any statutory buffers are required to be included as part of the rezoning and will ensure the continuation of existing agricultural activities on adjacent land and maintenance of appropriate amenity standards.</p>	<p>assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>
		<p>There are concerns regarding the impact on water including depletion of aquifers and contamination of groundwater.</p> <p>Section 1.6 of the Amendment 18 Report refers to the water extraction licence issued by DWER for the Proposed Plant.</p> <p>Year round, continuous extraction of significant quantities of water from the underlying aquifer will compromise the availability and quality of water for human consumption and agricultural purposes. Without reliable water, farm businesses cannot function. Continual extraction of water throughout the year increases the risk of salinity to water, which renders water unusable for drinking and spraying.</p> <p>There has been no historical groundwater bore monitoring in or around the area of the Proposed Plant. DPIRD has undertaken monitoring of the southwest regional groundwater trends and has been mapping areas for increased threat of dryland salinity. However, the closest bore monitoring with historical data is a significant distance away from the Proposed Plant to the south east and north east with both bores recording a rising groundwater trend. The highest water level is at 25.27m below ground level.</p>	<p>The assessment and approval of water use and allocation is undertaken by the Department of Water and Environmental Regulation (DWER).</p> <p>Water allocation approvals is not material planning consideration as part of the scheme amendment process.</p>	<p>No change be made to the amendment in response to this submission.</p>

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		<p>Page 18 of the Rockwater Pty Ltd report (that is referred to in Appendix F - EIA) states that</p> <p><i>“Owing to the paucity of drilling data, on both sides of the Urella fault, and a lack of groundwater extraction and observation data. It would be difficult to develop or calibrate a meaningful numerical groundwater model to assess the proposed extraction at Tenindewa. It is therefore recommended that an adaptive management approach is applied to the proposed borefield, whereby suitable trigger levels are assigned in consultation with the DWER and borefield operations respond to observed drawdown.”</i></p> <p>The proponent has stated that it would be difficult to develop or calibrate a meaningful numerical groundwater model to assess the proposed extraction of the Proposed Plant, and unable to properly being able to confirm what would be a sustainable and environmentally safe limit of water extraction.</p> <p>Every aspect and potential future use of water should be carefully considered and confidently calculated as part of the planning process.</p> <p>This reactive approach to the proponent’s water extraction practices will cause adverse impacts on the quality and volume of groundwater supplies and that any such impacts will be irreversible.</p> <p>For example, extraction of water from further afield and leaching from evaporation ponds from the Proposed Plant will further recharge the local water table and will add to and exacerbate local salinity.</p> <p>In addition, if the Proposed Plant proceeds, other such industries may be attracted to the area, which would place additional pressure on</p>		

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		scarce water resources.		
		The location of the plant at the lowest point may cause water erosion will traverse into adjacent land. Photos provided with submission that demonstrate water run off and soil erosion within property that has already occurred as a consequence of the project.	The management of on-site stormwater retention is applicable to the development stage of a proposal.	No change be made to the amendment in response to this submission..
		The Indarra Spring Nature Reserve abuts the eastern boundary of the Proposed Site. The proponent does not address the effects that the Proposed Plant will have on the flora, fauna and water in the Indarra Spring Nature Reserve.	The applicant has addressed the Indarra Spring Nature Reserve as part of the EIA. The Department of Biodiversity, Conservation and Attractions have not raised any concerns.  It is considered that confirmation on the impact area and separation distances will provide sufficient guidance on this.	No change be made to the amendment in response to this submission..
		The table on page 26 includes the statement that “Nearby landowners were supportive of the project following initial and ongoing consultation that has occurred over the last 12 – 18 months”.  This is incorrect. The owners of this property did not and do not support the Proposed Plant. Only very limited consultation has occurred between the landowners and the proponent with very little information being supplied and landowners given no time to review, consider and seek advice or provide a response. When questions were raised with the proponent, no response was received.	This preliminary consultation sits outside of the required statutory consultation process dictated by the <i>Planning and Development (Local Planning Scheme) Regulations 2015</i> .  The implied results of any community consultation or support, whether correct or not, are not considered as part of the assessment of the rezoning.	No change be made to the amendment in response to this submission.
		We do not consider that the owner of the property upon which the Proposed Plant is to be located should be included in any data which indicates community support for the Proposed Plant. The reason for this is that the holder of the underlying land has a conflict of interest given that they are receiving a benefit from the Proposed Plant.	This preliminary consultation sits outside of the required statutory consultation process dictated by the <i>Planning and Development (Local Planning Scheme) Regulations 2015</i> .  The implied results of any community consultation or support, whether correct or not, are not considered as part of the assessment of the rezoning.	No change be made to the amendment in response to this submission.
		Of additional concern is the impact of the project on the mental health	These observations are noted.	No change be

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		<p>of the adjacent landowners. The Proposed Plant has caused significant stress on the family due to the uncertainty and the significant changes to amenity and lifestyle that the construction of an industrial plant will create.</p> <p>The landowner has no certainty as to the impact of the Proposed plant on economic stability of their agriculture business and also succession plans which are currently on hold.</p> <p>The public documents relied upon and lodged at the Environmental Protection Authority (EPA) by the proponent for the Proposed Plant appear to include misrepresentations and potentially misleading conclusions which it has relied upon in order to progress the approvals for the Proposed Plant to date.</p> <p>Our position is that they have misrepresented the following issues (amongst other things) in its environmental impact assessment referral to the EPA for the Proposed Plant:</p> <ul style="list-style-type: none"> <li>(i) the level of neighbour support;</li> <li>(ii) the extent of stakeholder consultation; and</li> <li>(iii) the location of the nearest neighbour;</li> </ul> <p>The EPA may need to formally assess the Proposed Plant to ensure the Proposed Plant has been assessed with the rigour.</p>		<p>made to the amendment in response to this submission.</p> <p>No change be made to the amendment in response to this submission.</p>
15	Local landowner	<p>Support, with changes.</p> <p>I support the development and domestic processing of minerals and energy in this area, on the proviso that the location of such developments does not adversely affect the interests of existing industries and parties.</p> <p>The proposed location of the vanadium processing facility at Tenindewa is understandable for reasons associated with bitumen road frontage, proximity to work force, and access to gas and rail infrastructure.</p>	<p>Comment is noted.</p> <p>Comment is noted.</p>	<p>No change be made to the amendment in response to this submission.</p> <p>No change be made to the amendment in response to this</p>

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				submission.
		<p>It would appear that there are material deficiencies in certain critical aspects, including distances to existing houses and farming infrastructure.</p>	<p>As per other submissions, the report does include incorrect mapping being Figure 1.6 and incorrect statements within Table 3.4 regarding the closest sensitive human receptor.</p> <p>These inaccuracies are to be corrected.</p>	<p>The amendment be modified to update and correct Figure 1.6 and Table 3.4 accordingly.</p>
		<p>Based on my detailed knowledge of farming at Tenindewa, it is my strong view that the location is highly inappropriate due to significant and unmitigable adverse impacts on the quiet enjoyment of the farming community</p> <p>The proximity of farm homesteads, direction of prevailing winds, and other negative externalities from the proposed plant mean it is incompatible with the Tenindewa location.</p>	<p>The applicant has provided an Environmental Impact Assessment and made statements that investigations have confirmed that no impacts will encroach beyond the property boundaries of Lots 40 &amp; 41.</p> <p>However, it is considered that the applicant has not appropriately demonstrated this through the provision and evidence of technical assessments. This should be provided to adequately ensure that the separation distance is suitable and if any buffers are required.</p>	<p>The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>
		<p>This project proposes an unknown risks to aquifers due to continuous water extraction.</p>	<p>The assessment and approval of water use and allocation is undertaken by the Department of Water and Environmental Regulation (DWER).</p> <p>Water allocation approvals is not material</p>	<p>No change be made to the amendment in response to this submission.</p>

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		<p>There are other rural locations that could be explored, including near Pindar.</p> <p>Despite its location north and south of the main road to the mining provinces, it is quite isolated.</p> <p>There are no nearby residences, and the prevailing southerly winds direct dust and noise across vacant farmland towards the adjoining pastoral area. The site is in a valley, and no light, noise or other outputs from the plant would be visible to any neighbours.</p> <p>There is Seasonal workers' accommodation and also a 600 man camp which was used during the construction phase of the gas pipeline.</p> <p>In terms of infrastructure, two gas pipelines and the disused Geraldton – Mt Magnet railway line passes through the property</p> <p>Given these reasons, I request; that the City of Greater Geraldton amends the local planning scheme for Pindar, not Tenindewa.</p>	<p>planning consideration as part of the scheme amendment process.</p> <p>The City is unable to consider supporting a proposal to rezone a separate parcel of land not part of the scheme amendment proposal.</p>	<p>No change be made to the amendment in response to this submission.</p>
16	Local landowner, resident & business owner	<p>Object</p> <p>We passionately believe that Tenindewa is a productive farming area, and everything should be done to retain it for such a purpose.</p> <p>It is clear in the WA State Planning Strategy 2050, that to meet global food demands, agricultural food production needs to double by 2050. Obviously, this highlights the need for Agricultural farmland to be protected.</p> <p>The Strategy states that tighter controls and incentives are needed to ensure the availability and productive capacity of agricultural land; fragmentation of rural land holdings is a particular concern; and that economic value must be assigned to the quality and quantity of Agricultural Land.</p> <p>Rezoning of any productive farmland in Tenindewa for industry is unnecessary and takes away land that is currently producing good</p>	<p>The State Planning Strategy provides planning principles, strategic goals and objectives which are used as a basis to find synergies between competing, complex and often inter-related land use planning issues.</p> <p>The proposed rezoning attempts to find a balanced position between meeting requirements for securing and protecting agricultural land and supporting the growth and development of the resource sector. Both being key objectives of the State Planning Strategy.</p> <p>The scheme amendment report provides an assessment in accordance with SPP 2.5 –</p>	<p>No change be made to the amendment in response to this submission.</p>

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		crops at a time when food security is front of mind.	Rural Planning of the extent of agricultural land loss due to the development. It calculated that less than 0.02% of available good to medium quality agricultural land within the Midwest Region would be lost.	
		It should be a community decision as to whether industry should be occurring in our farming zone. No family or company should be able to change the trajectory of a whole community without thorough community consultation and agreement.	This proposal is to only rezone a portion of Lots 40 & 41.  If any further rezoning proposals or larger strategic proposals are intended, further community consultation will be undertaken.	No change be made to the amendment in response to this submission.
		Whilst we feel DPLH have offered consultation opportunities, AVL have not attempted any community consultation with the community as a whole.  We had one visit to our farm from AVL where information about the project was presented. We were never asked for our thoughts or feelings about this proposed project.  The report states us as being neighbours who are in support of the project. This could not be further from the truth.	This preliminary consultation conducted by AVL sits outside of the required statutory consultation process dictated by the <i>Planning and Development (Local Planning Scheme) Regulations 2015</i> in relation to this rezoning application.  The implied results or comments on any preliminary consultation, whether correct or not, are not considered as part of the assessment of the rezoning.	No change be made to the amendment in response to this submission.
		AVL have mentioned in some of their planning documents that they see the Tenindewa project as a possible catalyst for the creation of an industrial hub at Tenindewa; this would devastate our community.  Once industry is established in an area it sets a precedent for others to establish themselves in the same area, and AVL have unfortunately alluded to this in various documents.	The City's Local Planning Framework does reference the need for additional industrial land within the eastern periphery of Greater Geraldton. This has been appropriately referenced within the scheme amendment report.  The City is currently undertaking the Future Industrial Land Project which proposes to identify strategic locations for industry within the eastern periphery to support future	No change be made to the amendment in response to this submission.



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			development and prevent ad-hoc proposals. The project has focus on balancing the need for additional zoned industrial land against the impact on high yielding agricultural land.	
		The area is not set up with infrastructure for supporting industry. This includes the fact that the main road is not fit for purpose today – it is certainly not capable of sustaining more traffic, in particular the significant increase in large trucks that would be required for this project. The addition of two extra access points to the main road would add to the safety issues associated with this already busy road.	<p>Geraldton Mt Magnet Road is a 300km state route connecting rural producers and mining operations over an extensive area to Geraldton. Operations along this route, and beyond, are anticipated to grow, increasing usage of the road.</p> <p>Main Roads WA is the responsible authority for managing use of the road and ensuring that it remains fit for purpose.</p> <p>In requesting their comment, Main Roads WA has supported the proposal subject to the application of access requirements and conditions via the SDAU process.</p>	No change be made to the amendment in response to this submission.
		There are also studies that show industry is more successful when closer to a main centre than Tenindewa is to Geraldton. We believe that this proposed processing plant would be much better situated alongside the mine site itself where industry is obviously already approved, and rezoning would not be needed.	<p>The multi-criteria analysis conducted and outlined within the report outlines the variables considered by AVL when selecting a suitable general location for the processing plant.</p> <p>Location to suitable land and infrastructure needs were a deciding factor with regarding to the site preferences.</p>	No change be made to the amendment in response to this submission.
		We also have significant concerns around the possible negative impact on land values in Tenindewa that rezoning may have. Since the project could possibly affect aspects of farming, impact access to water, damage the environment and impact lifestyle and appeal of the area, we believe that the financial losses for landowners, could be significant.	<p>Generally, loss of land values due to development is not a material planning consideration.</p> <p>However, this concern is centred around loss of land productivity from the impacts and</p>	The amendment be modified to update Section 3.1 of the report to appropriately demonstrate through technical

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			<p>emissions from proposed industrial land use.</p> <p>The applicant has provided an Environmental Impact Assessment and made statements that investigations have confirmed that no impacts from the processing plant will encroach beyond the property boundaries of Lots 40 &amp; 41.</p> <p>It is considered that the assessment of the impact area, has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5.</p> <p>It must be demonstrated and confirmed that there is no loss of agricultural productivity to the surrounding land given the area is specifically used for food production.</p> <p>This should determine a suitable separation distance from the plant to any sensitive land use (including land for food production) and whether any statutory buffers are required to be included as part of the rezoning.</p>	<p>assessment and modelling the applicable impact area, separation distance and buffer zone as required in accordance with State Planning Policy 2.5 – Rural Planning and State Planning Policy 4.1 – Industrial Interface.</p>