

**SUMMARY OF SUBMISSIONS**  
**Local Planning Scheme No.3 Amendment No.1 - L12 King Road, Oakford**  
**Additional Use Advertisement Period: (07/11/24 - 14/01/25)**

Submitter	No.	Submitter Comments	Applicant Response	Shire Comment
Department of Water and Environmental Regulations	1	<p>Thank you for providing the proposed local planning scheme amendment received 7 November 2024 for the Department of Water and Environmental Regulation (Department) to consider.</p> <p>The Department has identified that the proposed change of use from poultry farm to non-hazardous chemical blending may have the potential for impacts on water resource values and/or management. The Department has reviewed the information provided, including the risk assessment report prepared to provide a risk analysis on the change of land use and provides the following comments and advice.</p> <p>The subject site is located within a Priority 2 (P2) area of the Jandakot Underground Water Pollution Control Area. According to the Department's Water Quality Protection Note 25: Land use compatibility tables for public drinking water source areas (DWER, 2021), chemical blending is incompatible within a P2 area.</p> <p>However, based on the site-specific information, risk assessment report and proposed land-use activity provided by the proponent, the Department considers the proposed change in land use from poultry farming to blending non-hazardous chemicals will likely result in an overall reduction in water quality contamination risks at this site.</p> <p>Therefore, the Department does not object to the proposed amendment to the local planning scheme. Furthermore, should the Shire approve the amendment to the local planning scheme, the Department would expect the proposed non-hazardous chemical blending facility development application to be referred to the Department for comment. Based on the current information provided to the Department for the non-hazardous chemical blending facility the Department provides the following preliminary advice on the proposal.</p>	N/A	<p>Thank you for the submission.</p> <p>The Shire notes the concerns raised by DWER regarding the proposed amendment located within the Priority 2 area of the Jandakot Underground Water Pollution Control Area. The Shire is of the understanding that there is expected to be no runoff or leaking potential from the proposed non-hazardous chemical blending operations due to works being all self-contained within the existing sheds.</p> <p>As indicated by DWER's submission, the proposed amendment is expected to have a reduced risk of water contamination than that of the existing poultry farming use. Therefore,</p>

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		<ul style="list-style-type: none"> <li>Chemical storage and blending activities are limited to those detailed in the proposal.</li> <li>The bunded area within the sheds should be impervious to liquids, including both the flooring and walls up to the height of the bunding. Any defects in the flooring, as observed in the risk assessment, must be remedied prior to storage of chemicals.</li> <li>The bunded area within the sheds should be regularly inspected and maintained to ensure the bunded area remains impervious and leak-proof.</li> <li>Refuse should be stored appropriately and removed on a regular basis to an approved off-site waste management facility.</li> <li>All chemicals should be stored so there is no discernible risk of contamination of groundwater or surface water.</li> <li>A contingency plan for managing and responding to spills should be in place, as per Water Quality Protection Note 10: Contaminant spills – emergency response plan (DWER, 2020).</li> <li>Stormwater management systems should be designed and constructed in accordance with the Department's Stormwater management manual (DWER, 2022) and Decision process for stormwater management in Western Australia (DWER, 2017). Stormwater from the first 15 mm of runoff from access roads and hardstand areas should be directed to biofiltration areas (rain gardens, tree pits or vegetated swales) and undergo water quality treatment via biofiltration.</li> </ul> <p>In addition, any change in land use will require an amendment to the existing groundwater licence to update the activity. As it has been identified that the proposed change in land use will result in a reduction in the amount of groundwater abstracted, an amendment to the water entitlement is also required. Further advice can be provided by contacting the licensing section at the Mandurah office on 9550 4222.</p>		<p>the Shire is supportive of DWER's submission.</p> <p>The Shire agrees with preliminary advice received by DWER and supports the provided design measures and provisions associated with the potential approval of proposed scheme amendment No. 1.</p>

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		In the event there are modifications to the proposal that may have implications on aspects of water management, the Department should be notified to enable the implications to be assessed.		
Water Corporation	2	<p>The Water Corporation notes the proposed land use controls associated with the proposal. The Corporation's Birrega Main Drain is situated approximately 600m from the eastern boundary of the site. The site falls eastwards towards the Birrega Drain.</p> <p>Appropriate conditions should be applied to any approvals and ongoing site management to ensure post-development runoff from the land does not increase, and that appropriate measures are in place (e.g. the proposed bunds) to ensure any contamination from chemicals, pesticides and nutrients is contained on the site and intercepted and treated as necessary. In this regard, further advice should be sought from DWER.</p>	Noted. These requirements are able to be satisfied.	Noted. Thank you for your submission.
Main Road Western Australia	3	In response to correspondence received on 7 November 2024, please be advised Main Roads has no objections to the proposed Local Planning Scheme amendment.	Noted.	Noted. Thank you for your submission.
Department of Primary Industries and Regional Development	4	<p>The Department of Primary Industries and Regional Development (DPIRD) does not object to the proposed additional use - 'Light Industry' at the abovementioned lot. The Department of Water and</p> <p>Environmental regulation assessed the proposal and found that the proposed use will reduce the risk of groundwater contamination of the Priority 2 Jandakot Underground Water Pollution Control Area.</p>	Noted. It is intended that the additional use will have no detrimental impact on the Priority 2 Jandakot Underground Water Pollution Control Area.	Noted. Thank you for your submission.
Department of Fire and Emergency Services	5	<p>I refer to your email dated 7 November 2024 in relation to the referral of Proposed Scheme Amendment No. 1 for Lot 12 (101) King Road, Oakford.</p> <p>It is unclear from the documentation provided if the Shire of Serpentine-Jarrahdale has applied State Planning Policy 3.7 – Planning in Bushfire</p>	If required, a Bushfire Management Plan will be submitted in support of a Development Application.	The Shire acknowledges the comments and concerns received from DFES. Officers

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		<p>Prone Areas (SPP 3.7) to this proposal.</p> <p>DFES notes that it is uncertain if the proposal to allow additional land uses on the subject site would be considered an intensification of land use and therefore trigger assessment against the SPP.</p> <p>Exemptions from the requirements of SPP 3.7 should be applied pragmatically by the decision maker and are identified in Guidelines for Planning in Bushfire Prone Areas (section 2.6).</p> <p>Should you apply SPP 3.7 then, we request the relevant information pursuant to this policy be forwarded to DFES to allow us to review and provide comment prior to the Shire's endorsement of the scheme amendment.</p> <p>If there is some other reason which has given you cause to consider a referral to DFES, could you please provide detail on the attached 'Referral to DFES Checklist'.</p>		<p>consider that the proposed amendment is not a suitable stage to apply SPP 3.7 as at this point the amendment will result simply in a change of use to scheme text with no further intensification of the site. The Shire notes that, if required, a Bushfire Management Plan will be submitted in support of a Development Application (DA) and therefore the requirements of SPP3.7 can be applied at the appropriate time.</p>
Department of Health	6	<p>The DoH provides the following comment:</p> <p>1. Water Supply and Wastewater Disposal</p> <p>The DoH has no objection to the change of use from poultry farm to non-hazardous chemical blending, subject to compliance with conditions outlined in the Department of Water and Environmental Regulation letter (ref DWERT906 and PA 049856).</p> <p>It is noted that no information regarding onsite wastewater system management has been provided in the proposal. Should a new onsite</p>	<p>Noted. Further details regarding the adequacy of existing onsite wastewater disposal systems will be outlined in a Development Application.</p>	<p>Noted. Thank you for your submission. These matters regarding future wastewater requirements are to be addressed and comply the relevant government policy at the time a DA is lodged.</p>

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		<p>wastewater system be proposed, it must comply with the Government Sewerage Policy 2019.</p> <p>Please also note that onsite wastewater systems and water quality protection note (WQPN) 25 are deemed incompatible within drinking water source protection areas classified as Priority 2. A copy of WQPN 25 is available at: <a href="https://www.wa.gov.au/government/publications/wqpn-25-land-use-compatibility-tables-public-drinking-water-source-areas">https://www.wa.gov.au/government/publications/wqpn-25-land-use-compatibility-tables-public-drinking-water-source-areas</a></p>		
Harley Dykstra	7	<p><b>1.0 Introduction</b></p> <p>This submission has been prepared in response to proposed Scheme Amendment No.1 to the Shire of Serpentine Jarrahdale Local Planning Scheme No. 3 (LPS 3) to allow for an additional 'Industry – Light' use at Lot 12 (No. 101) King Road, Oakford.</p> <p>The additional use will facilitate the discontinuation of the existing poultry farm operation, resulting in the introduction of a very low-key light industry that involves blending, packaging and storage of non- hazardous agricultural and mining products.</p> <p><b>2.0 Purpose</b></p> <p>This submission seeks the removal of Condition 4 from the proposed schedule for the 'Additional Use.' This proposed condition limits the blending of materials to the very specific list of products that have been included within the Strategen report prepared in January 2022.</p> <p>We understand that the Shire wants to safeguard the risk of potential impacts due to the materials blended and processed onsite. The Strategen report offers just one example of a set of non-hazardous chemicals, however, there are other non-hazardous chemicals that would be equally suitable for use in this circumstance. The intention of the Strategen report was to demonstrate that the change of use would result in a reduced risk to the environment and to the Jandakot Groundwater Mound, when compared with the existing</p>	<p>It is recommended that condition 4 is removed from the scheme amendment as this limits the Clients ability to accommodate the needs of their customers, as well as meet changing market demand.</p>	<p>The Shire notes the submission. However, it is the Shires position that condition 4 remain as is and as supported by Council and the Minister of Planning. The condition specifically relates to the Strategen JBS &amp; G Risk Assessment to ensure that only the chemicals listed with in the report can be considered in future applications. This will ensure a tightly controlled approach to the types of chemicals permitted on site and which aims to protect the assumptions regarding the</p>

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		<p>poultry farm. The addition of condition 4 limits our Clients ability to accommodate the needs of their customers, as well as meet changing market demand.</p> <p>The Town Planning Scheme is not the most appropriate planning instrument to control whether a light industry can use one type of blending product or another. The Planning Scheme sets out the objectives and standards and leaves it for the Development Application and approval process to control the details of how to meet these objectives and standards.</p> <p>The Client is aware of the information included within the Strategen report and, through the Development Application process, will ensure that suitable mitigation measures are undertaken to reduce odour and dust emissions as well as respecting the Jandakot Groundwater Mound.</p> <p>Furthermore, proposed Conditions 1, 2 and 5 stipulate that any Development Application will be subject to suitable technical studies as well as advice from DWER. This is a safe and sure mechanism to ensure that any proposed non-hazardous materials pose no risk to the amenity of the area or to the Jandakot Groundwater Mound.</p> <p>3.0 Conclusion</p> <p>We would appreciate the Shire's consideration to remove Condition 4 as it places a significant and unnecessary limitation on what our Client can produce. Such a limitation would render the Scheme Amendment and intended change of use unfeasible.</p>		<p>compatibility of the proposed non-hazardous chemical blending in the rural zone.</p> <p>Any changes to the chemicals used or activity of the site will first need to be referred to DWER for advice.</p> <p>Alternatively, the applicant may provide an updated Strategen Report detailing the full list of expected non – hazardous chemicals to be used on site subject to Development assessment and approval if it is considered the current report is too restrictive.</p>
Submitter 8	8	<p>Dear Sir</p> <p>I submitter X of XXXX object to the scheme amendment that would provide an addition use of "Industrial – Light" for Lot 12 (No.101) King Road, Oakford.</p> <p>Our property is XXXXX is adjacent to the subject property and downstream of ground waterflows from the applicant's property.</p>		

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		<p>Reasons for objection.</p> <p><u>New TPS</u></p> <p>New TPS has considered the location of light industrial, with this area not considered suitable. The TPS has only (relatively) recently been gazetted and is not so out of date that this proposed scheme amendment should be contemplated.</p> <p><u>Inappropriate site location</u></p> <p>The site has dispensation for poultry farming and notwithstanding the older and degraded nature of the farm, it is a permitted activity accommodated by surrounding land uses. There are no particular features of the land that suggest suitability for the proposed zoning amendment or the proposed chemical blending use, meaning, that aside from the owners ambitions, there is no compelling reason to amend the scheme or consider the application.</p> <p>The buildings are dilapidated, the property is surrounded by rural uses and dwellings and the site is devoid of any beneficial feature that suggests the development or scheme amendment should be considered.</p>	<p><u>New TPS</u></p> <p>Local Planning Scheme No.3 provides for 'Additional Use' sites to be incorporated into the scheme, subject to normal Scheme Amendment requirements, processing and decision making.</p> <p><u>Inappropriate site location</u></p> <p>Harley Dykstra has demonstrated within the Scheme Amendment document that the proposed additional use is suitable within the existing context, and in particular that the proposed use will improve the amenity of the surrounding locality (i.e. no more poultry farm</p>	<p><u>New TPS</u></p> <p>Thank you for your submission. The Local Planning Scheme No.3 provides for Additional uses to be considered for specified land regarding use classes that are not specified within the permissible zoning table in which the land is located. These additional uses are subject to Council and WAPC consideration and approval.</p> <p><u>Inappropriate site selection</u></p> <p>The Shire considers the proposed additional use will provide and improved amenity to the surrounding locality, including the reduction of existing operational impacts. The Shire</p>

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		<p><u>Additional risk to surrounding landowners</u></p> <p>An additional use of “Industrial – light” approval confers future approval rights for additional future usage under the scheme. This provides a future risk to the surrounding landowners, not only via the inappropriate development of a chemical blending facility as currently proposed, but for future developments - made possible, or approvable, under the provision of the scheme.</p> <p>The current zoning of the subject property is “Rural, Rural groundwater protection”</p> <p>The objects of the scheme under the rural zone are (emphases mine):</p> <p>To provide for the maintenance or enhancement of specific local rural character.</p> <p>To protect broad acre agricultural activities such as cropping and grazing and intensive uses such as horticulture as primary uses, with other rural pursuits and rural industries as secondary uses in circumstances where they demonstrate compatibility with the primary use.</p> <p>To maintain and enhance the environmental qualities of the landscape, vegetation, soils and water bodies including groundwater, to protect sensitive areas especially the natural valley and watercourse systems from damage.</p>	<p>odour, dust and night time noise and lights).</p> <p><u>Additional risk to surrounding landowners</u></p> <p>The parameters of the additional use will be regulated by the ‘Conditions of Additional Use’ within the scheme. In addition, any proposed development will need to lodge a Development Application with the Shire. This will ensure that any potential future land uses (albeit ‘Industry Light’ uses only) are appropriate.</p>	<p>considers the proposed operation will not intensify the site and is expected to utilise the existing features/buildings on site. Therefore, officer consider there will be minimal impacts to the surrounding rural character and the proposed use is suitable within the existing context.</p> <p><u>Additional risk to surrounding landowners</u></p> <p>There will be specific planning and development controls for the additional use to the site that is regulated through the use of the 7 conditions of additional use which is to be written into the Scheme. Any proposed development will need to lodge a Development Application with the</p>



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		<p>To provide for the operation and development of existing, future and potential rural land uses by limiting the introduction of sensitive land uses in the Rural zone.</p> <p>To provide for a limited range of non-rural land uses, only where they have demonstrated a direct benefit to the local community and are compatible with surrounding rural uses.</p> <p>Additionally, the site is partly on the SCA2 – Jandakot Ground Water Protection, the scheme notes:</p> <ol style="list-style-type: none"> <li>1. Development within SCA3 should be consistent with State Planning Policy 2.3: Jandakot Groundwater Protection Policy and the Department of Water and Environmental Regulation's Water Quality Protection Note No. 25 – Land Use Compatibility Tables for Public Drinking Water Source Areas (as amended).</li> <li>2. Development approval shall be required for all development within SCA2, excluding residential development.</li> <li>3. The local government may refer an application for development approval to the Department of Water and Environmental Regulation for comment where that application is for a use which is identified as compatible with conditions or incompatible within the relevant priority area on the Department of Water's Land Use Compatibility Table in the Water Quality Protection Note No. 25 – Land Use Compatibility in Public Drinking Water Source Areas (as amended).</li> </ol> <p>The proposed scheme amendment is a precipitant to a development application that is contrary to the stated objectives of the rural zone and will adversely affect the pursuit and enjoyment of these objectives by surrounding landowners.</p> <p>Moreover, the proposed use is manifestly inconsistent with the requirements of SCA3.</p>	<p>SCA2:</p> <p>Pre-lodgement consultation has been undertaken with DWER to ensure that the proposed use will have no impact on the Jandakot Ground Water Protection Area. An Environmental Risk Assessment was prepared and submitted to DWER for their comment whereupon it was advised that they were supportive of the proposed change of use. Further, a Development Application will be lodged at a later stage, in line with point 2.</p>	<p>Shire. This will ensure that any potential future land uses (albeit 'Industry Light' uses only) are appropriate and meet the conditions of the additional use requirements within the Scheme.</p> <p>SCA2:</p> <p>The Shire notes the concerns raised in regards to SCA2. DWER has been consulted on the proposal and has no objections to the additional use. It has been considered that all operations and works is to be contained within the working sheds on site and therefore there is expected to be no impact to the groundwater on site</p>

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		<p><u>Previous unlawful activity:</u></p> <p>Part of the objecting landowners concern emanates from previously documented and reported pollution events by the proponents, curiously, related to the proposed chemical blending operation.</p> <p>This pollution event occurred in 2014 and was documented in photograph and video by me personally.</p> <p>Below is an excerpt from an email sent to the DWER and the Shire of Serpentine Jarrahdale at the time of the recorded pollution event:</p> <p><i>From: Dan Avila [mailto:dan.avila@iinet.net.au] Sent: Wednesday, 8 October 2014 3:12 PM</i></p> <p><i>To the responsible officer,</i></p> <p><i>The attached photos were taken at approximately 10am, today 8 October 2014. They were taken from Lot 35 Abernethy Road at the adjoining east boundary of 101 King Road.</i></p> <p><i>During 2012 and 2013, the operators were seen using the limestone pad between the sheds as well as the sandy area surrounding the sheds next to the fence lines, to receive, store and washout hundreds of random chemical drums (photo attached). See also...</i></p> <p><a href="https://www.youtube.com/watch?v=iiGHufAyO3k">https://www.youtube.com/watch?v=iiGHufAyO3k</a></p>	<p>The proposed blending, packaging and storage of non-hazardous chemicals inside the existing poultry sheds will have far less impact on the amenity of the area than the existing poultry farm. This is due to the 'closed system' nature of operation of the proposed land use.</p> <p>The proposed scheme amendment is consistent with the objectives of the rural zone. It should also be noted that the site is located within SCA 2, not SCA 3.</p> <p><u>Previous unlawful activity:</u></p> <p>This comment is unsubstantiated and unrelated to the current Scheme Amendment. Moreover, the proposed facility will consist of a closed system, resulting in no odour or dust emissions. In our view, this should be seen as a major improvement when compared with the current poultry farm.</p>	<p>including the Jandakot Ground Water.</p> <p>The Shire will seek further advice and comment from relevant government agencies including internal departments of the Shire upon the lodgement of the Development application for the additional use.</p> <p><u>Previous unlawful activity:</u></p> <p>The Shire notes this comment and notes that at the time of the incident, this was reported to the Shire and DWER.</p> <p>This is however a separate issue to the proposed scheme amendment application however the Shire will</p>

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		<p>Amongst these chemicals were highly potent pesticides which were simply washed out on the ground and allowed to drain away - in contempt of any consequences to human health, the welfare of the chickens being grown for Baiada, the Jandakot Water Mound or the greater environment. That activity was unrelated to the poultry farm and did not have any development approval from the LGA, nor any operating licence from D(W)ER.</p> <p>This directly documented pollution event is emblematic of the adjacent landowner's considerable concern about unsuitability of the site for "industrial-light" zoning with a subsequent development approval for chemical blending.</p> <p>Questions</p> <ul style="list-style-type: none"> <li>• If approved, will the proposed activity's emissions buffers (noise, odour, dust, etc) be contained within the subject property, and will future residential development be subject to a boundary setback to accommodate the proposed property scheme amendment and development application.</li> <li>• Are the existing sheds proposed to be repurposed for the chemical blending operation and what provision will be mandated to effect appropriate environmental and amenity protection, including monitoring of emissions and groundwater.</li> </ul>	<p>Questions:</p> <p>The proposed Light Industry use will consist of a closed system, meaning that no dust, noise and odour will escape the sheds. Furthermore, residential development prospects for adjoining land is not earmarked within any strategic planning documents.</p>	<p>take it on notice with regards to future operations at this site.</p> <p>Question 1.</p> <p>The proposed additional use – Light Industry aims to reduce the amenity impacts through the future chemical storage and blending operations by means of a closed system. Therefore, it is</p>

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			The proposed Light Industry use will be contained within the existing sheds. Upon discontinuation of the existing poultry farm operations, the sheds will be cleaned and hosed out in preparation of the proposed installation of stainless-steel blending tanks in several of the sheds. The remaining sheds will be used for storage of pre-blended and post-blended materials. These materials will be stored in sealed containers. Further, all tanks will be bunded, ensuring there is no discharge of waste outside of the sheds or into the groundwater.	the intent of the future use to contain dust, odour, noise and emissions within the property. These considerations will be addressed further at the DA stage.  Question 2.  The Shire notes that the proposal indicates that the sheds will be designed in a manner to ensure the operation of storage/ blending is self-contained, including the ability to contain/cover accidents such as spillage, leaks and the like. These are considerations that will be addressed appropriately at the DA stage.
Submitter 9	9	As per submission 8	Please see comments above (submission 8).	Please see comments above (submission 8).
Submitter 10	10	As per submission 8	Please see comments above (submission 8).	Please see comments above (submission 8).

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Submitter 11	11	As per submission 8	Please see comments above (submission 8).	Please see comments above (submission 8).
Submitter 12	12	As per submission 8	Please see comments above (submission 8).	Please see comments above (submission 8).
Submitter 13	13	As per submission 8	Please see comments above (submission 8).	Please see comments above (submission 8).
Submitter 14	14	<p>Please accept this submission of feedback and supporting evidence when assessing and determining the appropriate outcome of the request for Scheme Amendment for Lot 12 (No 101) King Road Oakford, to approve additional use of "Industry-Light" to SJ LSP3.</p> <p>Firstly, I would like to raise some questions in regards to the amendment application and the current operations of "Poultry Farm".</p> <p>1. Does the Current operation (Poultry Farm) have the adequate regulatory permissions to be using the Chemicals (especially as the property within a Priority 2 area of the Jandakot Underground Water Pollution Control Area) as identified in the application?</p>	<p>1. The non-hazardous chemicals referenced in the Scheme Amendment do not relate to the existing land use, but to the proposed land use.</p>	<p>Thank you for your submission.</p> <p>1. The current operation of the Poultry Farm does not have approval for the proposed 'Additional Use' of Industry Light for the purpose of chemical blending and storage. The proposed operations for chemical blending and storage relate specifically to the proposed scheme amendment not the existing land use.</p>

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		<p>The proposed additional use would be 'Industry - Light' and would result in the discontinuation of the current poultry farm operations in order to accommodate the specific Industry - Light use of blending, packaging and storage of agricultural and mining products. Although permitted within the rural zone, the current poultry farm comes with obvious noise, dust, odour and amenity impacts particularly on a site of this nature. Replacing the poultry farm use with an Industry - Light use (blending and packaging facility) would improve the amenity of the site and surrounding properties.</p> <p>It is also important to note the majority of the site falls within a Priority 2 area of the landakot Underground Water Pollution Control Area. A risk assessment was conducted to provide a risk analysis comparing the risks associated with the current poultry operations and the proposed blending operations. The assessment was presented to DWER who advised the risk assessment demonstrated the proposed use would result in an overall reduction in water quality contamination risks at this site.</p> <p>In addition, this Scheme Amendment has been prepared following detailed consultation with the Shire Officers. Harley Dykstra prepared a Preliminary Scheme Amendment request in November 2022 to ascertain the Shire's support for the additional use of Industry - Light. Following the Shire's feedback, the Proposed Conditions of the Additional Use were amended to reflect this consultation with it advised that a formal Scheme Amendment could not be submitted until such time that LPS 3 was gazetted.</p> <ul style="list-style-type: none"> <li>Formaldehyde</li> <li>Glutaraldehyde</li> </ul> <p>Each shed has a 0.3 m fall (west to east) of its concrete hardstand, with the washout water coming out of the eastern end of the sheds into infiltration sumps. During use, the sheds are lined with sawdust supplied from local recyclers. The sawdust is regularly broken up with a rotavator to assist in disease control and prevention as it gets wet inside the shed. At the end of each farm batch, formaldehyde and glutaraldehyde are sprayed within the sheds as a disinfectant when the sheds are dosed prior to their next use.</p> <p>Each shed has a 0.3 m fall (west to east) of its concrete hardstand, with the washout water coming out of the eastern end of the sheds into infiltration sumps. During use, the sheds are lined with</p> <p>2. What quantity of these chemicals are being used to treat the facilities after each batch of chickens (6 batches per year) ? Ref: Operations Page 5</p> <p>The poultry farming process takes an average of 43 days for a hatchling to reach adulthood when it is then processed. This results in approximately six batches per year of 104,000 chickens, requiring a</p>	<p>2. The existing poultry farm operates legitimately in accordance with relevant local and state policies, regulations and standards.</p> <p>This application is not for a poultry farm but rather will see the discontinuation of the current poultry farm operations.</p>	<p>2. The existing poultry farm operates legitimately in accordance with relevant local and state policies, regulations and standards.</p>

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		<p>3. I am aware that the current operation reports emissions, however given the nature of the disinfectant chemicals and their toxicity especially through dermal contact and inhalation, would like to know if there are any requirements to report the quantity of chemicals being used annually and if there is any monitoring being applied to the birds prior to being processed for human consumption.</p> <p><u>in disease control and prevention as it gets wet inside the shed. At the end of each farm batch, formaldehyde and glutaraldehyde are sprayed within the sheds as a disinfectant when the sheds are dosed prior to their next use.</u></p> <p>4. The amendment request states that the current bore is licences to extract up to 21 ML of water per year from the underlying aquifer, however the calculations provided equate to 35.59 ML being used plus additional rainwater used for drinking and other uses. Could this please be clarified?</p>	<p>This will be enforced by the 'Conditions of Additional Use.'</p> <p>3. As above.</p> <p>4. The specifics of the current bore licence are not related to the scheme amendment.</p>	<p>This application is not for a poultry farm but rather will see the discontinuation of the current poultry farm operations. This will be enforced by the 'Conditions of Additional Use.'</p> <p>3. As above.</p> <p>4. This does not relate to the proposed amendment. If there is a reason for cause of concern regarding the water usage at the site, please contact DWER or the Shire Health Department.</p>

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		<p>The poultry farming process takes an average of 43 days for a hatchling to reach adulthood when it is then processed. This results in approximately six batches per year of 104,000 chickens, requiring a total of 4.91 megalitres (ML) of water each year.</p> <p>Water for the farm is supplied from a groundwater bore on the Site, <u>which is licensed to abstract up to 21 ML of water per year from the underlying aquifer</u> (Licence number: 60199).</p> <p>At the start of the farming process, each shed is hosed out with fresh water and cleaned, requiring <u>approximately 1.11 ML of water per year</u>. The fogging cooling system within the sheds requires <u>approximately 24.02 ML per year</u>. Water for drinking and other uses is obtained from rainwater tanks located on the property.</p> <table><tr><td>4.91 ML</td><td>p/a</td><td>Poultry Farm processing</td><td>4.91 ML</td></tr><tr><td>1.11 ML</td><td>ea</td><td>(beginning of each process to hose and clean x 6 batches)</td><td>6.66 ML</td></tr><tr><td>24.02 ML</td><td>p/a</td><td>Fogging Cooling system</td><td>24.02 ML</td></tr><tr><td colspan="3"></td><td>-----</td></tr><tr><td colspan="3">TOTAL CONSUMPTION</td><td>35.59 ML</td></tr><tr><td colspan="3"></td><td>V's</td></tr><tr><td colspan="3">BORE LICENCE</td><td>21.0 ML ?</td></tr></table>	4.91 ML	p/a	Poultry Farm processing	4.91 ML	1.11 ML	ea	(beginning of each process to hose and clean x 6 batches)	6.66 ML	24.02 ML	p/a	Fogging Cooling system	24.02 ML				-----	TOTAL CONSUMPTION			35.59 ML				V's	BORE LICENCE			21.0 ML ?	<p>5. All packaged products, be it raw materials or a finished product, will be stored and handled according to regulations and will pose no risk to neighbours.</p> <p>6. The proposed use will not involve the creation of chemicals onsite. Chemicals will be made by manufactures elsewhere and delivered to the site, and into the sheds.</p>	<p>5. Noted</p> <p>6. The proposed Light Industry use has provided information supported by DWER that the operation will</p>
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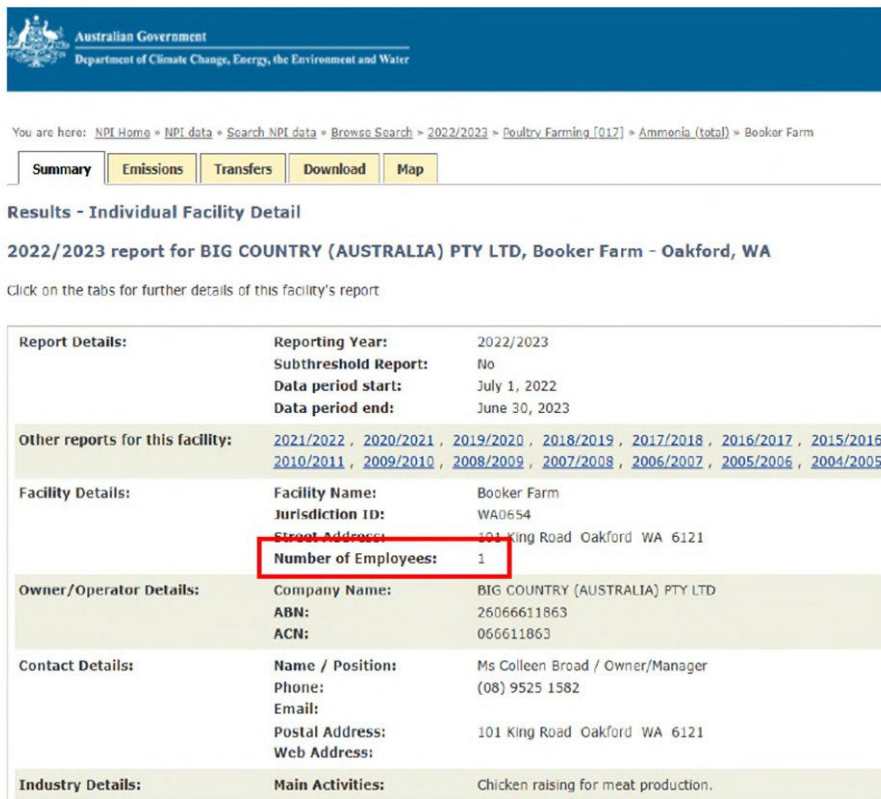
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		<p>The subject site is located within a Priority 2 (P2) area of the Jandakot Underground Water Pollution Control Area. According to the Department's Water Quality Protection Note 25: <i>Land use compatibility tables for public drinking water source areas</i> (DWER, 2021), chemical blending is incompatible within a P2 area.</p> <p>However, based on the site-specific information and risk assessment provided by the proponent, the Department considers the proposed change in land use from poultry farming to <u>blending non-hazardous chemicals</u> will result in an overall reduction in water quality contamination risks at this site.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>All material that is to be blended will be delivered on-site and stored until such time that it is required to be blended. All material that is received will arrive within sealed containers for liquids and large sealed bags for dry non-hazardous chemicals. All chemicals blended and delivered to the Site are non-hazardous, presenting a small risk to the environment and will be delivered with the relevant material safety data sheets (MSDS) providing this information (Appendix D).</p> </div> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>required once all materials are appropriately discharged into the blending tank. The blending tank motor then blends the combined material until the new agricultural non-hazardous chemical product is produced. Upon completion, the blending tank will then be emptied into an appropriately</p> </div> <p>Can we be absolutely sure that DWER is aware that the chemicals being brought to and stored on site before being blended, do not apply to the NON HAZARDOUS labelling?</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>The residual risk of groundwater contamination and associated impacts from the existing operation is considered high due to several potential sources of contamination present on-site. Vehicles and machinery are often stored on-site and overnight during the poultry processing periods, which offer a source of contamination to groundwater through leaks and spills during refuelling, maintenance and parking.</p> <p>Washouts of the sheds are a frequent requirement with this process collecting significant volumes of water, including residual waste and chemical residue within the sheds, with the potentially contaminated wash water collected in sumps which infiltrate directly to the ground. The concrete flooring and bunding of the sheds are also aged, with some visible cracks and repairs required.</p> </div> <p>The Current facility is clearly not managed adequately to ensure that groundwater contamination is minimised, so why would anyone expect that</p>	<p>The chemicals, predominantly liquids, are placed in blending tanks inside the shed. In most instances, liquid such as water, wetter or dye is then poured into the tanks via a small door on the top and mixed together (see image below). Only 20% of blends involve non-liquids, and 95% of these are granules and 5% is powders. All mixing takes place inside, with the shed doors closed. The mixers are also compliant with the noise regulations. The blended chemicals are then stored temporarily until collected by a semi-trailer and delivered to customers.</p> 	<p>consist of a closed system, ensuring that no dust, noise, odour or liquid will escape the sheds.</p>

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		<p>they would do anything different once they are granted approval to change the operation to a chemical blending and storage facility?</p> <p>7. The application requests States that the current farm staff will be retained to perform blending operations. 6—8 staff on site at any given time. Are these staff going to be appropriately trained in handling chemicals? Staff numbers are different to those being reported to Govt Authorities.</p> <p>The number of staff on-site is to remain unchanged from the poultry farm operations, with employees to be retained for blending operations. Approximately six to eight staff will be on-site at any given time. Hours of operation will be within standard business hours of 8:00 am – 5:30 pm</p>	<p>This comment about the current management of the poultry farm is not substantiated and should therefore be disregarded.</p> <p>The proposed Light Industry use will consist of a closed system, ensuring that no dust, noise, odour or liquid will escape the sheds. This approach has been supported by DWER, with specific measures outlined in the Stratagen report to ensure that this is achievable.</p> <p>7. A subsequent Development Application will be lodged which will outline specifics such as staff numbers and hours of operation. Staff will be appropriately trained for the job.</p>	<p>7. The proposed amendment is not the stage to consider the staff currently hired or any future hire of staff. This is a matter to be addressed if and once the additional use is approved and lodged. The Shire notes that all staff should be trained appropriately no matter the job or task.</p>

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		 <p>8. How are we to believe statements like these when it is brought to our attention throughout the application request that the Western to Eastern aspect has a fall of 0.3m and that sheds are washed out using this fall into infiltration sumps that contaminate the ground water?</p>	<p>8. As stated above, and as outlined in the Stratgen report, the proposed Light Industry use will consist of a closed</p>	<p>8. Refer to the Shire's response for no. 6</p>

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		<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>The bunding and floors of the proposed blending sheds will be repaired where necessary and the floors coated with chemical resistant paint. Additional bunding will be placed at the shed doorways, and the old infiltration sumps will be decommissioned.</p> <p>In the unlikely event of a spill, the material will be contained and collected, and spill kits will be stored on-site and accessible. <u>The proposed bunding will have the capacity to accommodate the entire contents of the tanks within the sheds without any risk of discharge to the ground or groundwater.</u></p> <p>As a result of the change in activities and the implementation of the associated controls, the Proposal will result in a reduced (moderate) residual risk of impacts to groundwater and associated users and dependant ecosystems.</p> </div> <p>9. Please refer to the following MSDS for the ingredient Chemicals specified by the proponent. Most of them advise that dust extraction and adequate ventilation is required. Therefore, the requirement of an Extraction system is very likely meaning that particles and vapours will be extracted from the sheds and let out into the environment and winds to be spread across the township and residential community.</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>The operational management of the Proposal requires the clean-up of any product that may land on the concrete bunded floor to be (where possible) placed back within the blending tanks. In the event that the material is unable to be re-blended, the material will be collected, contained and disposed of off-site in an appropriate manner. <u>No dust emissions are anticipated to occur during the chemical blending process due to materials arriving within sealed containers, and discharge into blending tanks is to occur with the aid of dust extraction equipment if required to eliminate the occurrence of fine dust particles.</u></p> </div> <p>10. Most of these Chemicals are also required to be kept cool. Has anyone asked the proponent how they intend on doing this in large sheds during our summer months?</p>	<p>system, ensuring that no dust, noise, odour or water can escape the sheds. As such, there will be no risk of contamination to the ground water.</p> <p>9. Please refer to comment 6 whereupon the whole process has been outlined. It is important to reiterate that the operator prefers liquid chemicals to powdered chemicals, with approximately 1% of chemicals comprising of powdered form (note this was calculated on the basis that <math>20 \times 0.05 = 0.01</math>.) Further, the report states that no dust emissions will occur. This has been prepared by a professional and therefore holds credibility.</p> <p>10. The chemicals will be stored inside and out of direct sunlight. The type of chemicals that will be blended do not</p>	<p>9. Refer to the Shire's response for no. 6</p> <p>10. Noted. Any storage issues will need to be assessed and</p>

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		<p>Please find the following evidence that not all chemicals in this proposal are NON Hazardous. (<i>refer to attachments</i>).</p> <p><a href="https://ftp.sjshire.wa.gov.au/main.html?download&amp;weblink=7ecc90aa34f086c68a69241c5e99a6e4&amp;realfilename=Submitter\$20No.14\$20attachment.pdf">https://ftp.sjshire.wa.gov.au/main.html?download&amp;weblink=7ecc90aa34f086c68a69241c5e99a6e4&amp;realfilename=Submitter\$20No.14\$20attachment.pdf</a></p>	<p>need to be stored in extra cool conditions. See the below images to understand how the chemicals will be stored.</p> 	<p>addressed during or at the DA stage.</p>



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		<p>I also forgot to add the context to my recent diagnosis (letter of diagnosis attached in previous email) of allergens that I have been told to avoid under all circumstances.</p> <p>I believe this is the adverse affect of a mandatory vaccination, however as I am unable to prove it, I am left to live with it and manage the medical issue myself.</p> <p>This is the reason I am so passionate about opposing the approval of a Chemical plant to be introduced to my community, not far from my residential property (of 10 years), where vapours and particles will be extracted from the site and pushed out into the environment, enabling them to be carried across the community in the strong winds we experience for a good portion of the year.</p> <p>This has the potential to settle on surfaces in and around our home, including the roof where the run off will be washed into our Rain Water Tank where all of our household water is contained (including drinking water) as we are not able to connect to scheme water in our area.</p> <p>Not to mention the pollutants that will be exposed to the environment around the site itself that I believe sits above the Jandakot Water Supply (now aware that Formaldehyde and Glutaraldehyde have been leaching into for some time.</p> <p>This diagnosis took over 18 months and cost me well over \$10k in appointments, treatments and time off work associated with the incredibly horrible new health issue.</p> <p>My Biggest allergen is D-LIMONENE (one of the specific HAZARDOUS Chemicals prescribed to be stored on site) – where I had a huge reaction during patch testing and was told by the medical staff they had never seen such a strong reaction to any patch testing.</p> <p>I was placed on high does of Steroids and immunosuppressant medication (Cyclosporin – use to suppress the immune system of organ transplant</p>	<p>The submitters concerns are noted. However, the proposed use will not result in the generation of airborne particles. It is important to reiterate that the proposed use is not a “chemical plant” as no chemicals are made on site. Premade chemicals arrive on site and are mixed with water, dye or wetting agents inside the sheds.</p> <p>Please see the information outlined below in regards to airborne particles:</p> <ul style="list-style-type: none"> <li>- The operator prefers to use solids, such as prills and granules over powders. Solids are easier to work with and do not pose the risk of clumping together or creating dust.</li> <li>- 80% of the chemicals are liquid and 20% are solids. Of that 20%, 95% are prills and 5% is powder. This equates to 1% of the total chemicals being powdered form.</li> <li>- For the 1% instance that powered chemicals are mixed with the liquid, the powder is</li> </ul>	<p>The Shire notes the additional concerns by the submitter. As mentioned above, the proposal is to be self-contained within the sheds on site. It is considered that the closed system and operation of the chemical blending and storage will ensure no runoff- vapours and odours or particles will impact the environment or local neighbouring community.</p> <p>The only chemicals permitted on site is that of which has been identified within the Strategen report, which identifies all products as non- hazardous. Therefore, the Shire considers the proposed amendment, and the schedule of conditions that will accompany the additional use within the scheme, provide for</p>

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		<p>patients) just to manage the reactions I was experiencing. This in turn has lead to sever degradation of my teeth which now require a full mouth of Crowns to rectify (\$60k) and I developed cataracts in under 5 months on these medications. I am now on the Medicare waitlist for lens replacement surgery as I don't have \$13k to pay for them myself. The only issue with the medicare system is that it is a min of an 18month wait, but my Specialist at the Lions Eye Institute has advised I will be lucky to manage for 12 months without the replacement surgery.</p> <p>This has lead to my whole house, products, activities and surroundings being modified to accommodate. I have been advised by Health Specialists that airborne contaminants are the biggest issue as they are the ones that I cannot control.</p>	<p>pumped into the tanks via a venturi to ensure no dust is generated outside the tank.</p> <p>- Dust particles are actively avoided inside the sheds as these can alter the finalised product.</p>	<p>the appropriate measure to be put in place to reduce the potentially impacts as mentioned with in the submissions received.</p>