



**NEW SUMMARY OF SUBMISSIONS**  
**PA21/163 – Lot 60, 394 Robertson Road, Cardup - Proposed Mobile Concrete Batching Plant**

Submitter	Submitter Comments	Applicant Response	Officer Response
	<p>proposal until above information has been received and reviewed.</p> <p>Thank you in advance.</p>		
DPLH	<p>Thank you for providing the above development application to Land Use Planning Policy (LUPP) for comment. It is understood the proposed mobile batching plant is to be located in the rear of the existing permacast facility, which is in the same lot as Bush Forever area 361.</p> <p>Bush Forever area 361 is a Negotiated Planning Solution site. Liaison between the land owner and the Western Australian Planning Commission has resulted in a Deed of Agreement and a proposed MRS Amendment to better manage the interface between the environment and the industrial site. Following the proposed MRS Amendment, all the development will be outside land designated as Bush Forever. Currently, the proposed stormwater will be within Bush Forever area 361.</p> <p>It would be recommended that the Development application be deferred until such time as the Deed of Agreement is executed and the MRS Amendment has been released for public comment to follow the logical planning sequence.</p> <p>Please note this correspondence provides comment with respect to State Planning Policy 2.8 Bushland Policy for the Perth Metropolitan Region (SPP 2.8) and Bush Forever only and does not collate comment from other branches within the Department of Planning, Lands and Heritage or provide a formal position on the proposal by the Western Australian Planning Commission, which may need to be consulted.</p> <p>Should you require any additional information or clarification, please contact Rachel Williams on 6551 9095.</p>	<p>The applicant has considered the advice received from DPLH and provides the following in response.</p> <p>The landowners entered into a signed Deed of Covenant with the WAPC following the negotiated planning solution having redefined the boundary of Bush Forever area 361 in accordance with the approved LSP road alignment.</p> <p>This deed details the commitments of the WAPC and the landowners respectively. In particular, the WAPC under clause 2.1 are required to initiate the MRS and LPS amendments. The landowners are to cede the land free of cost under clause 3.1 unencumbered.</p> <p>As referenced within the deed under clause 7 – Works it states the following as referenced by the DPLH:</p> <p><i>Following completion of the MRS &amp; LSP amendments, as set out within clause 2, and when required to do so by the commission, the owners at their cost:</i></p> <p><i>A) Arrange for the drainage to serve the</i></p>	<p>The proposed stormwater management system has been amended and there is no longer any infrastructure proposed within the Bush Forever Site.</p>
DPLH – Submission in response to updated information	<p>Thank you for providing extra information for the Development Application PA21/163 – Lot 60 Robertson Road, Cardup.</p> <p>It is understood there are 2 options for the drainage –</p>	<p><i>A) Arrange for the drainage to serve the</i></p>	<p>Officers note DPLH's support for the amended proposal to</p>

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received 27/05/2021	<p>1. to keep it as the original application (drainage swale in Bush Forever on the southern edge of the proposed road reserve), and to close off the existing drain that is currently going into Bush Forever, or</p> <p>2. the amended plans where the drainage will remain on site at the proposed batching concrete plant, and the existing drain into Bush Forever remains.</p> <p>It should be noted that in the negotiations for the agreed Structure Plan, the applicant agreed that the drainage swale was to be located on the <i>northern</i> side of the proposed road, with no drainage discharging into Bush Forever, not the southern side. It is unclear as to whether the current proposed swale location would have implications for the unmade road for the Cardup Business Park structure plan.</p> <p>As part of the Deed of Agreement it states that: following completion of the MRS and LPS amendments, arrange for the drainage to be aligned on the north side of a future 23m road reserve, and to decommission the existing informal drain and remediate the ceded portion of Lot 60. With the proposed drainage swale to the southern side, it would not reflect the agreed Deed of Agreement.</p> <p>As such, our preferred option would be the option 2 - amended plan, where the drainage for the new proposed works to remain in the batching plant location. Although this means that the existing informal drain will remain, when the Deed of Agreement is executed, the informal drain will be removed, and the drainage swale will be aligned to the north side of the proposed road.</p>	<p><i>existing and future development and subdivision of the land (Lot 60) to be aligned on the north site of a future 23m wide road reserve.</i></p> <p><i>E) following the completion of the survey, arrange supply and construction of rural standard fence (of a material and height approved by the commission along the boundary of the Ceded land and the remainder of the land.</i></p> <p>As part of this DA, the applicant considers the works required for the construction of the relocated drainage swale to be in effect, the commencement of works required to be undertaken as part of the deed of covenant for the preservation of Bushforever Area 361. Alternatively, the drainage swale currently constructed onsite which discharges stormwater generated from the existing Permacast hardstand (east of the shed) will continue to be discharged into the bush forever area 361 until such a time as the WAPC provide written notice of the implementation of the Deed of Covenant.</p> <p>The overall intent of the DA therefore is to preserve vegetation contained within Bush Forever area 361 (as amended)</p>	<p>ensure that stormwater is managed outside of the Bush Forever Site.</p>

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		<p>and ensure stormwater drainage is managed in the most appropriate manner to protect vegetation in perpetuity.</p> <p>The rural fence may be appropriately conditioned as part of this development application and installed at the cost of the landowner to the satisfaction of DPLH to further ensure vegetation within bush forever area 361 is preserved in perpetuity.</p>	
<p>DBCA – Submission in response to updated information received 27/05/2021 and updated DPH submission</p>	<p><b>394 Robertson Road Cardup – Proposed Mobile Concrete Plant</b></p> <p>In reference to your correspondence dated 17 March 2021, the Parks and Wildlife Service at the Department of Biodiversity, Conservation and Attractions (DBCA) provides the following comments.</p> <p>The proposal Mobile Concrete Plant adjoins Bush Forever area 361, and the proposed drainage swale is located within the current Bush Forever boundary.</p> <p>DBCA understands that the Department for Planning Lands and Heritage (Manager Policy) (DPLH) has advised that,</p> <ul style="list-style-type: none"> <li>• Bush Forever area 361 is a Negotiated Planning Solution site, and that liaison between the landowner and the Western Australian Planning Commission has resulted in a Deed of Agreement and a proposed Metropolitan Scheme (MRS) amendment to better manage the interface between the bushland and the industrial site, and</li> <li>• Following the MRS Amendment, all of the development will be outside land designated as Bush Forever.</li> <li>• It was recommended that the development application be deferred until such time as the Deed of Agreement is executed and the MRS Amendment has been released for public comment.</li> <li>• During the negotiations for the agreed Structure Plan, the applicant agreed</li> </ul>	<p>N/A</p>	<p>Officers have forwarded the comments to the applicant for response and factored the comments in when considering the amended stormwater proposal.</p>

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	<p>that the drainage swale was to be located on the northern side of the proposed road, with no drainage discharging into Bush Forever, not on the southern side of the proposed road as proposed.</p> <ul style="list-style-type: none"> <li>Part of the Deed agreement states that following completion of the MRS and Local Planning Scheme Amendment (LPS), the drainage is to be aligned on the north side of future twenty three metre wide road reserve, the existing informal drain will be decommissioned and the ceded portion of Lot 60 remediated.</li> </ul> <p>It is understood that following the review of amended plans that DPHL provided further advice that,</p> <ul style="list-style-type: none"> <li>The amended plan, where the drainage for the new works will remain in the batching plant site, is preferred to the original proposal, and</li> <li>Although this means the existing informal drain will remain within the Bush Forever area, when the Deed of Agreement is executed, the informal drain will be removed, and the drainage swale will be aligned to the north side of the proposed road.</li> </ul> <p>DBCA supports the advice provided by the DPHL.</p> <p>Thank you for the opportunity to provide comment. Should you have any queries regarding the above comments, please contact Lyndon Mutter on 9442 0342.</p>		
DWER	<p>The Department has identified that the concrete batching plant at Lot 60 Robertson Road in Cardup has the potential for impact on environment and water resource values and/or management. In principle the Department does not object to the proposal, however key issues and recommendations are provided below and these matters should be addressed.</p> <p><b>Issue</b> Industry Regulation</p>	<p>The applicant acknowledges the advice provided by DWER regarding a category 77 prescribed premises and will proceed to lodge a category 77 prescribed premises licence application with DWER, outlining compliance with the <i>Environmental Protection (Noise) Regulations 199</i>, <i>Environmental Protection (Concrete Batching and Cement Product Manufacturing)</i></p>	<p>These comments have been forwarded to the applicant for information.</p>

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	<p><b>Advice</b></p> <p>The Department regulates emissions and discharges from the construction and operation of prescribed premises through a works approval and licensing process, under Part V, Division 3 of the <i>Environmental Protection Act 1986</i> (EP Act).</p> <p>The categories of prescribed premises are outlined in Schedule 1 of the <i>Environmental Protection Regulations 1987</i>.</p> <p>The EP Act requires a works approval to be obtained before constructing a prescribed premises and makes it an offence to cause an emission or discharge from an existing prescribed premises unless they are the holder of a works approval or licence (or registration) and the emission is in accordance with any conditions to which the licence or works approval is subject.</p> <p>The provided development referral request was reviewed in relation to works approval and licence requirements under Part V Division 3 of the EP Act.</p> <p>Based on the information provided, the proposed operations will cause the premises to be considered a prescribed premises as per Schedule 1 of the <i>Environmental Protection Regulations 1987</i> for the following category:</p> <table border="1" data-bbox="224 1069 1279 1372"> <thead> <tr> <th data-bbox="224 1069 403 1109">Category</th> <th data-bbox="403 1069 918 1109">Category Description</th> <th data-bbox="918 1069 1279 1109">Production or Design Capacity</th> </tr> </thead> <tbody> <tr> <td data-bbox="224 1165 403 1204">77</td> <td data-bbox="403 1165 918 1372">Concrete batching or cement products manufacturing: premises on which cement products or concrete are manufactured for use at places or premises other than those premises</td> <td data-bbox="918 1165 1279 1252">100 tonnes or more per year</td> </tr> </tbody> </table> <p>The site was identified by the Department as a potential prescribed premises</p>	Category	Category Description	Production or Design Capacity	77	Concrete batching or cement products manufacturing: premises on which cement products or concrete are manufactured for use at places or premises other than those premises	100 tonnes or more per year	<p><i>Regulations 1998 and Environmental Protection (Unauthorised Discharges) Regulations 2004.</i></p>	
Category	Category Description	Production or Design Capacity							
77	Concrete batching or cement products manufacturing: premises on which cement products or concrete are manufactured for use at places or premises other than those premises	100 tonnes or more per year							

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	<p>through its light industries inspection program through the Pollution Response Unit. The occupier has had verbal preliminary discussions with Department officers, including from the Process Industries sector regarding a works approval application. No application has been received by the Department to date.</p> <p>The application will also need to demonstrate compliance with the general provisions of the EP Act and all relevant regulations e.g. <i>Environmental Protection (Noise) Regulations 199</i>, <i>Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998</i> and <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.</p> <p><b>Issue</b> Acoustic Report</p> <p><b>Advice</b> The Departments Environmental Noise Branch has reviewed the development application document, as well as the acoustic assessment report prepared by Herring Storer Acoustics (HSA). The HSA report predicted that noise from the proposed mobile concrete batching plant would comply with the <i>Environmental Protection (Noise) Regulations 1997</i> (Noise Regulations) at all times, including night-time. HSA also predicted that noise from the proposed batching plant would not significantly contribute to the overall noise emission levels from Permacast's current operations. HSA further predicted that the cumulative noise emissions from the Permacast site with inclusion of the proposed batching plant would comply with the Noise Regulations at all times. The Department would agree with HSA's assessment conclusions, based on the following reasons:</p> <ol style="list-style-type: none"> <li>1. The methodology of HSA's noise modelling seems correct. Most of the input data and assumptions adopted for the noise modelling seem reasonable;</li> <li>2. The modelled noise emission levels for three operation scenarios (Permacast current operation, proposed batching plant operation only and Permacast future operation with the proposed batching plant) also seem</li> </ol>		

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	<p>reasonable.</p> <p>3. The noise criteria used for the noise compliance assessment are correct.</p> <p>It is noted that the proposed concrete batching plant will be at least 500 m distant from the residential premises located on the western side of Robertson and Soldiers Roads. Further, it will be located behind the main Permacast shed, which provides the proposed batching plant a significant barrier for the residences to the west.</p> <p>The HSA report assumes that tonal characteristics, if present, will not be discernible as the predicted levels are in the same range as the measured background levels. Table 4.1 presents “average ambient noise levels”. While no parameters are quoted, it appears to refer to LAeq levels which are not a good indicator to determine potential for masking, the LA90 parameter is usually used for this purpose. The LA90 data presented in Appendix C however does indicate that there is a potential for tonality to be masked.</p> <p><b>Issue</b> Groundwater</p> <p><b>Recommendation</b> The subject lot is located within the Serpentine groundwater area (Byford 3 subarea) as proclaimed under the <i>Rights in Water and Irrigation Act 1914</i>. Any groundwater abstraction in this proclaimed area for purposes other than domestic and/or stock watering taken from the superficial aquifer, is subject to licensing by the Department.</p> <p>The issuing of a groundwater licence is not guaranteed but if issued will contain a number of conditions that are binding upon the licensee. Please contact the water licensing section on 9550 4222 for further advice.</p> <p>Where the Department has a statutory role, planning applications should be considered prior to the Department issuing any relevant permits, licenses and/or approvals.</p>		



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	<p>In the event that the applicant determines that a works approval or licence application is required under Part V of the <i>Environmental Protection Act 1986</i> (EP Act), the advice provided in this communication does not prejudice and must not be considered to infer the outcome of the EP Act licence and works approval process.</p> <p>In the event there are modifications to the proposal that may have implications on aspects of environment and/or water management, the Department should be notified to enable the implications to be assessed.</p>		
A185202	<p><b><u>Operational Hours</u></b></p> <p>The Development Application (Section 4.4) states “Hours of operation are dependent on market and customer demand. Typically, the batching plant will commence operations at 5:00 am or earlier depending on the destination of the concrete, with peak demand typically at 7:30 am and by 9:00 am production reduces substantially with all operations finishing by 2:00 pm”. It is understood that after 2 pm material bins will be restocked and the premises cleaned and maintained until the plant closes at 6 pm.</p> <p>The operational hours are not clearly defined and operational hours vary within the documents provided. Impacts to local residents need to be clearly understood. We oppose and object to operational hours stated to be from 5 am or earlier any day of the week and particularly on Saturdays.</p> <p><b><u>Increases in traffic demands</u></b></p> <p>Proposal states that between 4-6 trucks are to be in operation per day to deliver 100 m3 of concrete to surrounding development projects. A potential for 2 additional trucks on-site to supply Permacast (100 m3). This does not include the traffic impacts from the delivery of raw materials (aggregate, sand and cement).</p> <p>The proposal also further states that no more than 20 agitator trucks per day would be utilised to deliver the concrete directly to sites, which is considerably</p>	<p>Thank you for your considered submission.</p> <p><b><u>Operational Hours</u></b></p> <p>For the removal of any doubt, batching operations outlined within the DA which may commence onsite on or before 5:00am, relate specifically to pre-start checks and other works associated with the plant, internal to the Permacast Facility. Agitator trucks are anticipated to leave the yard for limited external supply based solely on the destination and the time at which the concrete pour is scheduled. Given the proximity of the batching plant to existing and future projects, typical external deliveries for residential developments would commence from approximately 6:00am, depending upon the project destination and pour commencement time. There is</p>	<p><b><u>Operational Hours</u></b></p> <p>Officers consider that as no batching works are to be undertaken prior to 5:00am then there would not be undue noise emitted to the locality. Pre-start checks by the employees would not be considered to generate any undue noise to the locality. With the trucks not operating concrete deliveries prior to 6:00am will also ensure no undue noise impacts the locality. This is detailed within the</p>

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	<p>more than the aforementioned 4-6 trucks. The above traffic volumes are based on 100 m3 of concrete being used by Permacast (on site) and 100 m3 to external supply.</p> <p>The Proposal DA also makes reference to the future development projects of the Tonkin Gap and Byford Rail extension indicating the long-term intentions for the Proposal to service these future project demands. The external supply requirements are likely to exceed the 100 m3 quoted and the long-term intentions of the Proposal to only supply 100 m3 externally are questionable.</p> <p>The increases on traffic volumes and traffic routes such as access requirements (either South West Highway or Soldiers Road) is not clearly defined and impacts to local residents, schools, needs to be more accurately defined. We are opposed and object to increases of 20 trucks per day and additional traffic impacts due to raw product deliveries.</p> <p>We also oppose and object to the utilisation of Soldiers Road due to the give way-controlled intersection, which is single lane approach and departure. Traffic safety due to large vehicles exiting at peak school times and potential noise from the increase in large truck movements from 5 am and outside of standard business operational hours.</p> <p>What will the impacts be to the proposed PSP along Soldiers Road? The Traffic Impact Assessment report does not include the any data or forecasts for the future proposed Soldiers Road PSP upgrade which is due to occur shortly.</p> <p><b><u>Dust/ Particles</u></b></p> <p>Part of the dust management strategy will be visual observations, training and 'daily washing to minimise dust impacts'. As part of the daily washing where will the potentially contaminated effluent be directed to for the Proposal. Refer to comments within drainage regarding surface water and groundwater contamination.</p> <p>The accendo risk assessment for dust manage includes the ability of the proponent to store aggregate and sand in stockpiles on the ground (outside of</p>	<p>a standard delay between the commencement of batching operations onsite and the agitator truck leaving the site for delivery.</p> <p><b><u>Increases in traffic demands</u></b></p> <p>All traffic associated with the proposed development is assessed and considered compliant in accordance with the traffic impact assessment provided.</p> <p>Regarding the proposed development and its perceived impact on the adjoining Court Grammar School during the peak pick-up period (deliveries for concrete finish at 2:00pm), the applicant seeks to re-enforce statements made within the DA report. No additional agitator trucks are to impact the surrounding road network than what currently services the Permacast Facility at peak production.</p> <p>Once operational, the primary purpose of the batching plant is to service the existing Permacast facility, with the majority of agitator trucking movements contained within the existing facility. Offsite deliveries by agitator trucks are to be made based on a particular project demand basis and are to comply with operational traffic</p>	<p>Acoustic Report submitted.</p> <p><b><u>Increases in traffic demands</u></b></p> <p>The TIA submitted demonstrates that the road network is well within capacity and the proposal would not adversely impact the rural residential area of Cardup – refer to Traffic section of report.</p> <p><b><u>Dust/Particles</u></b></p> <p>Concerns raised are noted. Refer to the Dust sub-section within the Amenity section of the report for full consideration to these matters. In summary, Officers consider the DMP does detail areas of risk and measures of management for dust. However, Officers</p>

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	<p>nominated hoppers/ bins). This poses a significant dust and airborne particle risk to local residents. The easterly winds can be very strong particularly during the dry summer months and are commonly up to 40 km/hr in an east or south-easterly direction.</p> <p>The risk assessment also indicates that hopper/ bins may have wind shields fitted which would increase the height of stockpiled products on-site and consequently increase the mobilisation risk of dust.</p> <p>The risks of dust deposition on human health (particularly residential receptors), remnant vegetation, Bush Forever areas and local amenity values are not monitored or accurately measured, with no appropriate trigger criteria or actions to be implemented. Management is based on visual observations which may over time become complacent, familiar and ability to overlook vegetation degradation possible.</p> <p>Sensitive receptors (school and residents) located within the 1,000 – 1,500 m radius of the batching plant which is not in direct accordance with EPA guidelines.</p> <p>The Accendo risk assessment for dust management includes the ability of the proponent to store aggregate and sand in stockpiles on the ground (outside of nominated hoppers/ bins). This poses a significant dust and airborne particle risk to local residents. The easterly winds can be very strong particularly during the dry summer months and are commonly up to 40 km/hr in an east or south-easterly direction.</p> <p>There is no trigger for moisture level prior to un-loading aggregate or sand to prevent airborne dust. Details surrounding dust management trigger levels and criteria are not clearly defined/ outlined.</p> <p><b><u>Drainage</u></b></p> <p>Drainage – proposed stormwater swales to be upgraded/installed will direct flow to the existing stormwater detention basin located in southwest corner of</p>	<p>management plans prepared for each project and approved by the Shire of SJ. No RAV vehicles used to restock material bins may pass the Court Grammar School as the road is not a RAV road, capable of supporting RAV vehicles. Therefore, the applicant confirms there will be no increase in traffic movements along Bishop road, negatively impacting the Court Grammar School during peak morning drop-off times due to the development of the mobile batching plant.</p> <p><b><u>Dust/Particles</u></b></p> <p>Dust is to be managed in accordance with the proposed dust management plan to the satisfaction of the Shire, with a register kept for any complaints received from adjoining neighbours.</p> <p>The DMP states the following:</p> <p><i>Aggregate and sand will not be stored on the ground at any time.</i></p> <p>The DMP states the following:</p> <p><i>No material within the bins will exceed the height of the bins as outlined in procedures.</i></p>	<p>have the following concerns with the DMP:</p> <ol style="list-style-type: none"> <li>1. It does not consider site specific meteorological conditions, being the east to west katabatic winds that move from the scarp.</li> <li>2. Therefore, Officers cannot be satisfied that the DMP suitably accounts for the existing and additional future sensitive receptors in the 1,000m buffer, nor that the existing Permacast shed would act as a suitable screen for dust particles. <p><b><u>Drainage</u></b></p> <p>An amended drainage proposal has been</p> </li></ol>

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	<p>the site (Robertson Road).</p> <p>The capacity (volume) of this drainage basin is not detailed nor is the details of the stormwater detention basin design. It appears the drainage basin may impact the operational capacity of historical Robertson road culvert, which appears to be sedimented and only part operational (Civil Technology Stormwater Management Plan 2014).</p> <p>Additionally, the detention basin appears to be un-lined and contaminants of potential concern for typical concrete batching plants include alkalinity (lime, calcium hydroxide), hydrocarbons and heavy metals (such as nickel and zinc) (as per the DER Assessment and Management of Contaminated Sites, 2014). There is a potential for these Contaminants of Potential Concern (COPC) to be released into the surrounding rural environment via local stormwater drains during 'daily mitigation dust measures' and impacts sensitive receptors including remnant vegetation and Bush Forever areas.</p> <p>Whilst groundwater is reported to be approximately 10 m below ground level, seasonal perched water tables have the potential to mobilise contaminants below the soil surface. Gravelly laterites present at the foothills of the Darling Scarp and assumed base of the retention basin will have higher permeability and therefore infiltration of contaminated run-off and stormwater drainage will infiltrate into the local environment. It is assumed that standing water within the retention basin is currently due to sedimentation from the erosion of the existing on site drainage swales.</p> <p>The impact on the surface water network during peak periods and rainfall events has not been considered appropriately during the proposal.</p> <p>The impact of spills, containment of spills and daily operations with the potential to mobilise contaminants through dust suppression/ water usage has not been adequately mitigated.</p> <p><b><u>Water Supply/ Operational Supply</u></b></p> <p>The proponent refers to the use of dust suppression for the mitigation of dust/</p>	<p>Finally, due to the location of the development in proximity to sensitive land uses and located behind the existing PERMAcast facility, compliance with the DMP proposed will ensure dust is appropriately managed onsite to ensure no offsite impacts.</p> <p><b><u>Drainage</u></b></p> <p>Further consultation with the Shire of SJ has been undertaken regarding the detailed capacity of the stormwater retention basin and associated stormwater swale. It is anticipated that as a condition of approval, an updated stormwater management plan inclusive of detailed engineering drawings and capacity calculations will be provided to the Shire for approval prior to construction.</p> <p><b><u>Water Supply/ Operational Supply</u></b></p> <p>The operational supply of water from existing water licences onsite is considered appropriate to meet the projected demand of the proposal.</p>	<p>submitted to relocate the stormwater management associated with the proposal outside of the Bush Forever Site. Details surrounding discharge rates and basin capacity are to be required as of a condition in an amended SMP. Officers are satisfied to support this amended proposal in principle as it ensures management occurs outside of the Bush Forever Site. In conjunction with the Bush Forever Amendment, Officers will ensure that appropriate management is put in place through the condition.</p> <p><b><u>Water Supply/ Operational Supply</u></b></p> <p>Noted – the applicant</p>

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	<p>airborne particles. However, it appears the water supply requirements for the Proposal have not been documented or identified in the documentation. The Proposal is located within a bushfire prone area and the storage of sufficient firefighting water supply has not been included in the Proposal.</p> <p>It is noted the Proposal area (Lot 60) has two groundwater abstraction licenses (GWL 205303 and 60205).</p> <ul style="list-style-type: none"> <li>• GWL 205303 is licensed for 39,000 kL (expiry 2030) and screened within the Superficial Aquifer.</li> <li>• GWL 205303 is licensed for 10,750 kL (expiry 2024) and screened with the deeper Cattamarra Coal Measures</li> </ul> <p>The availability of water able to be abstracted within the Superficial Aquifer is likely to be seasonally variable and possibly limited.</p> <p>The supply of water suitable for the concrete batching production and associated appropriate management of a concrete batching facility should be reviewed to ensure provisions of water for suitable firefighting procedures, management and production can be sourced.</p> <p>Closing statement: The landowners and all parties occupying 348 Soldiers Road, Cardup oppose and object to the proposed mobile concrete batching plant. The Proposal is not in keeping with local land use and is not listed as a permitted activity or land use within the current LPS No. 2 or future draft LPS No. 3. The mobile batching plant would only be permitted at the discretion of the Shire of Serpentine Jarrahdale and we would sincerely hope that the Shire considers this land use unsuitable at the rural fringes between Cardup and Whitby/ Mundijong.</p>		<p>has confirmed that the existing water licences would provide sufficient water for the proposal.</p>
A400085	<p>The dust causes Silicosis (lung disease). It is proven that living close to concrete plants effect your health. This is a windy area and easterlies will blow it to housing</p>	<p>Thank you for your considered submission.</p> <p>The applicant seeks to respond to the</p>	<p>Officers note concerns raised regarding the east to west winds that would</p>

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	<p>Standard dust control measures will not stop the spread.</p> <p>I live at Karbro drive Cardup (near intersection of Pollard Cross) and a concrete batching plant would have a major negative impact on myself and the area as a whole.</p> <p>Please see attached submission and comments below.</p> <p>A concrete batching plant will be disastrous to the area. Just go for a drive to your nearest concrete batching plant and you will see its effects and feel it in your lungs. I know because I drive past the BGC plant in Kwinana, even the vegetation is grey there. Also increased noise and truck traffic through Karbro Drive which already has excessive truck traffic as it is a short cut rather than using Bishop road as they are supposed to Silicosis which is prevalent in people exposed to or living near concrete batching plants. It is caused by airborne particles and I live downstream of the very strong easterly wind blowing through the proposed batching plant location. <b>Living near</b> these facilities, you are exposed to higher levels of harmful pollution</p> <p>Even inside a community, the pollution from a <b>concrete batch plant</b> can be comparable with the pollution along a congested freeway. Surely the health of the community is important to our local council - so please don't give approval to harm the local residents in that area including me.</p>	<p>matters raised by reinforcing statements made within the DA report outlining the nature of the batching plant operations. In particular, the plant proposed is a wet-batching plant which combines all raw materials including cement within a completely sealed portion of the plant, with no ability for dust discharge during batching operations. Discharge into the agitator truck is a wet concrete mix.</p> <p>Dust generated onsite is to be managed in accordance with the DMP to ensure no offsite impacts.</p> <p>The proposed batching plant as proposed to be fully compliant with the <i>Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998</i> at all times.</p>	<p>impact the site. Full details of Officers considerations regarding dust are details within the Amenity Section of the Council Report.</p>
A297905	<p>What measures are going to be taken for visual pollution, dust pollution, added noise pollution and increased traffic flow&gt;</p> <p>Is the facility going to be used for 'in house' production only or will the product be used outside of the facility?</p>	N/A	<p>Full details of Officers considerations regarding dust are details within the Amenity Section of the Council Report.</p>
A297902	<p>My concern is noise.</p> <p>There have been times where, for extended periods, there is a noise like a fleet</p>	<p>Thank you for your considered submission.</p>	<p>Officers consider noise impacts have been adequately</p>

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	<p>of helicopters approaching my property.</p> <p>I have investigated while the noise has been occurring and found that the noise disappeared around the area of the bus stop near Karbro road / Soldiers road intersection.</p> <p>On driving around to Robertson road via Norman road, the noise was not evident until reaching the entrance of the Permacast plant.</p> <p>I noticed a large embankment has been built up on the southern and western sides ending before the entrance driveway.</p> <p>When i drove up there was a lot of activity centred on formwork spread over a fair area. The noise was very loud.</p> <p>I asked to speak to the manager or site supervisor. I was directed to the office block. I was in there (unaccompanied) for some time and nobody appeared. I could not attract the attention of any other staff so had no choice but to go home.</p> <p>I am concerned that this plant will increase the amount of noise.</p> <p>I request that noise mitigation be a condition of approval and</p> <p>Hopefully this will include the earth embankment being extended up the northern side.</p>	<p>The proposed Concrete Batching Plant is considered to be fully compliant with the Environmental Protection (Noise) Regulations 1997 (Noise Regulations) at all times as assessed by DWER.</p>	<p>addressed as part of the noise assessment.</p>
A185408	<p>I have several concerns relating to the proposed concrete batching plant operation in Cardup and generally about the Development Application (DA).</p> <p><b>Water Usage, Storm Water and Effluent</b></p> <p>If the water required to make concrete (in excess of 10ML pa?) is sourced from local bores will residents' access to bore water be affected?</p> <p>Would the storm water treatment described in the DA be capable of handling contamination of water by oil, fuel, or grease related the vehicles used on site?</p> <p>The DA proposes that effluent is disposed of in the existing ablution facilities at</p>	<p>Thank you for your considered submission.</p> <p><b>Water Usage, Storm Water and Effluent</b></p> <p>Water required for dust suppression and operational purposes is to be sourced from existing groundwater licences provided to the existing PERMAcast</p>	<p><b>Water Usage, Storm Water and Effluent</b></p> <p>The applicant has confirmed that the existing water licences are sufficient.</p> <p>An updated SMP is recommended to</p>

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	<p>Permacast. How is this treated? Is it to the same standard required of nearby residents?</p> <p>Residents in the area do not have access to scheme water and are dependent on rainwater for domestic water supply and bores for gardens, pastures, livestock, and maintenance of static fire-fighting supplies. They are required to have on-site high quality sewage treatment to protect soils and water from nutrient load.</p> <p>They need some assurance that the quality and access to bore water is not affected.</p> <p><b>Dust</b></p> <p>The DA discussion on dust limits itself to visible dust. Why is this? I think invisible dust might be as significant a problem. My guess is that the smaller the dust particle size the farther it might travel on the frequent and strong Easterly winds and the greater potential for related respiratory health hazards.</p> <p>As nearby residents depend on rainwater supply collected from roofs the possibility of cement dust contaminating their drinking water (whether visible in the air or not) is a concern. Whilst the DA describes the process proposed to eliminate (minimise, reduce) cement dust during delivery from truck to silo the controls for the transfer from silo to hopper are not as clear. Further explanation and/or assurance is required.</p> <p>A buffer zone of 1.5km is recommended for this type of facility. There are residents closer than one tenth of that. Is the Dust Management Plan (DMP) robust enough to mitigate the proximity? It seems to be more passive and reactive and not as proactive as the circumstances would dictate.</p> <p>Employee observations of the skies for dust is important but when things get busy or when emergency situations arise, they may well go by the wayside. This should be supplemented by monitoring equipment that alarms when dust is detected, and levels recorded. Proactive reporting of duration and magnitude of dust levels should also be part of the DMP and not only required</p>	<p>facility. This development therefore will not require an increase in groundwater abstraction in excess to the approved groundwater licences onsite.</p> <p>Onsite Effluent disposal is appropriately managed onsite for the existing PERMAcast facility to the satisfaction of the Shire's health department.</p> <p>The applicant does not perceive the proposed development to cause any impact on the quality and access to residential bore water.</p> <p><b>Dust</b></p> <p>As previously stated, dust is to be appropriately managed in accordance with the Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998 as outlined within the DMP at all times.</p> <p><b>Noise</b></p> <p>The proposed Concrete Batching Plant is considered to be fully compliant with the Environmental Protection (Noise) Regulations 1997 (Noise Regulations) at all times as assessed by DWER.</p> <p><b>Production Levels and Hours of Operation</b></p>	<p>address any required stormwater treatment.</p> <p>All effluent disposal systems on site are subject to the requirements of the <i>Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974</i>.</p> <p>Concerns over water quality are addressed in the stormwater management section of the Council Report.</p> <p><b>Dust</b></p> <p>Officers note concerns raised regarding the east to west winds that would impact the site. Full details of Officers considerations regarding dust are details within the Amenity Section of the Council Report.</p>



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	<p>in relation to complaints.</p> <p><b>Noise</b></p> <p>What noise might be generated by the proposed plant that is exempt from regulation but still of impact to residents? For example, will reversing alarms be fitted to vehicles on the site? Has this classification of noise emission been considered in the DA?</p> <p>Section 5.4 of the DA states that the proposed concrete batching plant "... does not represent any adverse impact on the nearest sensitive landuse receptors ...". <b>This is not correct.</b> The data in the DA show that noise levels will increase, hours of operation will increase, and significant noise will be received earlier in the morning. So, duration and level of exposure will be higher and timing less acceptable. Surely that is an adverse impact!</p> <p>Compliance with the minimum standard in regulations does not mean there is no adverse impact.</p> <p>The aim should be noise levels as low as reasonably practicable. Have the proponents asked the noise consultants to identify significant points of noise generation and considered modifications to design, operations, screening, other mitigation strategies that might reduce the impact on residents. The focus of the DA seems to be on assessing compliance with regulations as if that were all there is to Noise Management. Examples: Could the transfer of concrete from Batch Plant to Permacast be by pump rather than truck (would it be less noisy). Are there differences in noise levels of FE Loaders and will the less noisy option be chosen? Are electric versions available? Could sound deadening approaches lower the noise of aggregates into the hopper?</p> <p><b>Production Levels and Hours of Operation</b></p> <p>The DA is based on a production capacity of 146Kt pa but it acknowledges the plant is capable of sustained production of nearly double that. Customer demand profile is what limits the production level. If this proposal is approved the proponent should be given no comfort that increases beyond the stated</p>	<p>To provide assurance on the proposed operating hours of the proposed Mobile Concrete Batching Plant, production capacity is determined at 146 tonnes per year. As outlined previously on advice received by DWER, a category 77 prescribed premises licence is required to enable production onsite. Operations are to be in accordance with the prescribed premise licence.</p> <p>Hours of operation as outlined within the DA report are not proposed to be restricted to prevent the proposed development meeting market demand for night pours on an as required basis. Compliance with the Environmental Protection (Noise) Regulations 1997 (Noise Regulations) may be achieved as assessed by DWER. Restricted operating hours are therefore not considered appropriate given the anticipated regional demand for material and the demonstrated compliance with the noise regulations, particularly after hours.</p>	<p><b>Noise</b></p> <p>It is considered that noise has been adequately managed – refer to noise section of report</p> <p><b>Production Levels and Hours of Operation</b></p> <p>Officers are to recommend a condition of determination to limit the production to no more than 150,000 tonnes of product per year.</p>

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	<p>capacity will be approved. The DA has several references to hours of operation with some inconsistency between them. P12 6:00am, elsewhere 5:00am <b>or earlier</b>. Clarification needs to be sought on this. Whilst early morning starts are not something the residents would be happy with, before 5am is worse than 5am, which is worse than 6am. Which is it? The DA also refers to the possibility of night-time operation to meet customer demand for large night-time pours. As a resident I am concerned that this could be the thin edge of the wedge. Conditions and controls should be in place that prohibit extended hours operation unless separately approved by the Shire with prior advice to residents and limits applied to the approvals in any week /month/ year.</p>		
A144401	<p>Here is my feedback and comment for the Development application for Lot 60 Robertson Road Cardup. Ref:PA21/163.</p> <p>My concerns are:</p> <ul style="list-style-type: none"> <li>• Noise - These businesses open very early and operate very loud machinery. I regularly hear very loud bangs and frequent alarms currently so would be concerned about an increase in this, particularly at an early time.</li> <li>• Increase in large trucks using quiet residential roads which are not purpose built for regular industrial truck usage.</li> <li>• This application being just the 'first step' in increasing heavy industrial works in this area. Why is this kind of development not being placed in the Mundijong industrial zone area?</li> <li>• Dust pollution - We experience very strong easterly winds in this area and I am concerned about the amount of dust that will affect us</li> </ul>	<p>Thank you for your considered submission and your concerns raised. The applicant considers the responses provided above to address all matters raised regarding, Noise, traffic, industrial development and dust management measures.</p>	<p>These matters have been appropriately addressed in the noise, traffic and land use sections of the report and through the relevant management plans provided. Officers note concerns raised regarding the east to west winds that would impact the site and full details of Officers considerations regarding this are within the Amenity Section of the Council Report.</p>

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Submitter	Submitter Comments	Applicant Response	Officer Response
A185100	<p>Our client's site is identified for urban residential development under the South Metropolitan Peel Sub-regional Planning Framework (2018), and the Shire's draft Local Planning Strategy (2019) and Mundijong District Structure Plan (2018). Residential is classified a sensitive land use and buffers are required to industrial uses.</p> <p>The proposed batching plant has a maximum capacity of 280,000 tonnes per year, though production is expected to be approximately 146,640 tonnes per year. (This will be associated with an existing concrete manufacturing facility operated by Permacast). The Environmental Protection Authority (EPA) Guidance for the Assessment of Environmental Factors: Separation distances between Industrial and Sensitive Land Uses (2005) specifies a 1-1.5km buffer for a use of this type. PA21 proposes a separation distance of ~230m boundary to boundary (to our client's site) and ~130m to the nearest existing residence.</p> <p>In our experience, the Department of Water and Environmental Regulation is extremely rigid in applying EPA Guidance separation distances, which are seen as the primary reference in buffer determinations. To that end, the Cardup Business Park Local Structure Plan (2019) provides explicit guidance that EPA Guidance separation distances should be adhered to, and that buffers "are to be managed within the boundaries of Cardup Business Park" and "it will be the responsibility of future landowners/developers to ensure that development is located appropriately within the Cardup Business Park to meet [buffer] requirements."</p> <p>PA21 provides no substantive justification to support the proposed significant reduction to the 1.5km buffer set out in the EPA Guidance. A Dust Management Plan (Accendo, 2021) has been provided, and reference is made to a 'wet-mix' process in the application. However, no technical analysis has been undertaken. No information is presented to measure the impacts of the proposed development or the efficacy of the management measures proposed, including assumptions that an existing shed will effectively contain dust</p>	N/A – submission was received late by Officers and not referred to the applicant	As discussed in the Council Report, Officers consider that according to the EPA Separation Distance Guide document that due to the volume of concrete product proposed to be created that an appropriate starting buffer distance for sensitive receptors would be 1,000m. Officers note concerns raised regarding the east to west winds that would impact the site and full details of Officers considerations regarding this are within the Amenity Section of the Council Report.

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	<p>emissions from blowing westward. Nor has the effect of a 'wet-mix' process been quantified to justify statements that it "produces substantially lower dust emissions" to the extent the proposal would justify a buffer reduction that's more in line with a facility with an output capacity 56 times lower than what's proposed under EPA Guidance. No reference has been made to the significant urban development planned for our client's site and surrounding areas as part of the Mundijong townsite, nor has the status of the rural residential area (shown as a 'planning investigation area' in the Sub-regional Frameworks) west of the proposal been considered.</p> <p>Given the above, we object to the proposal on the basis it is incompatible with planned urban development in the vicinity, and that is inconsistent with the planning framework (to the extent that buffers are required to be contained with the Cardup Business Park, and failing that, that insufficient justification is provided to justify a reduced buffer).</p> <p><b>CONCLUSION</b></p> <p>Concrete product manufacturing and batching can have a significant impact on the amenity of residential uses, particularly through dust emission.</p> <p>PA21 proposes a significant reduction to prescribed buffers, the justification for which is manifestly inadequate. The proposal is inconsistent with the approved planning framework for the area, which specifically requires buffers to be contained within Cardup Business Park, and seemingly no consideration has been given to the planned urban development of our client's land.</p> <p>We thank Officers for giving us the opportunity to make a late submission on PA21, and trust our objection to the proposal will be considered in the assessment and recommendation to Council.</p>		
Online submission No.1	Fully support this proposal as this will mean more jobs for local people	N/A	Noted.

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<b>Submitter</b>	<b>Submitter Comments</b>	<b>Applicant Response</b>	<b>Officer Response</b>
Online submission No.2	I see this as an exciting opportunity for the growth of the Serpentine Jarrahdale community. This mobile batch plant will be excellent for the industry, with the rapid growth of the population of our shire this will create more local jobs and help supply the housing developments and infrastructure requirements which with this proposal can be supplied locally, Which in turn will help keep revenue in our community for future developments and attract more people to our area. I have no objections to this proposal and it has my full support.	N/A	Noted.