

Our Ref: 22428

14 December 2023

MODAP

To Whom it May Concern,

RE: PROPOSED RETROSPECTIVE AND PROSPECTIVE PLANNING APPROVAL FOR INDUSTRY - CONCRETE PRODUCT MANUFACTURING FACILITY, LOT 60 ROBERTSON ROAD, CARDUP WA

Further to the recent decision by the MODAP to defer consideration of the application in order for the applicant to provide updated information, herewith we now include:

1. Updated Development site plan details and supporting commentary;
2. Updated Dust Management Plan;
3. Updated Noise and Vibration Report;
4. Updated Stormwater Management plan;
5. Detail regarding Landscaping and Vegetation Management;
6. Updated Bushfire Management Plan; and
7. Statement from Permacast qualifying situation in relation to fumes and odour.

1. Development Site Plan Updates:

The attached updated development site plan includes the following amendments from the original application detail:

- Carparking areas have been expanded to reflect four separate locations for parking, now totaling up to 250 car bays. We can confirm that there will not be an increase in staff numbers or production volumes from that originally stated, rather, the additional parking is shown in response to a request from the Department of Water Environment Regulation (DWER) that all overflow parking locations be identified and sealed. Note that overflow parking is only required during special projects to accommodate extra visitors and contractors when there are special project milestones or meetings held at the facility. The other reason for additional or overflow parking relates to the fact that there are a number of onsite vehicles used for onsite internal transport. Finally, for OH&S purposes, where staff work beyond the normal hours, they are required to leave their vehicles on site and the company arranges for other transport to get the workers home;
- Each stressing bed has been 'enveloped' with a nominated stressing bed preparation area;
- A production, handling and washdown area has been shown on the north side of Stressing Bed No 4;
- The "Temporary MEL Storage Area" located east of the approved concrete batching facility has been redesigned to accommodate additional parking and updated drainage design;
- More details have been provided in relation to cranes, boilers and gas tanks on the site plan;
- The location of the new acoustic barrier wall has been depicted in accordance with the Noise and Vibration Report. The westernmost acoustic walls is shown to be painted a 'pale eucalypt' on its western side (a standard colorbond colour) to blend in with natural tones of the surrounding vegetation and sky.
- Sealing and hardstand areas have been refined and shown as required by DWER;
- The boundary between Permapole and Permacast has been depicted; and
- An additional drainage basin has been shown just south of the entry driveway, together with a refined drainage layout as required by DWER.

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2. Dust Management:

In consultation with the DWER, a review of potentially dust generating activities on the site has occurred. This review has identified the main source of visible dust from the premises arise previously arose from the unsealed main driveway and unsealed laydown areas. Visible dust from production of concrete products is considered to be negligible as there is no mixing of cement or concrete. Concrete is deposited into moulds wet and no dry blasting/cleaning of products occurs.

The following measures are contemplated or in the process of being implemented, in consultation with DWER, to address concerns raised related to dust emanating from driveways and laydown areas on the site:

- All hardstand and driveway areas are to be sealed, paved or overlaid with concrete, asphalt or recycled asphalt material;
- Trafficable or laydown areas that are not able to be sealed, paved or overlaid for operational reasons are to be regularly treated for dust suppression with permanent onsite water carts or sprinklers;
- Until such time as the main driveway is sealed, all articulated trucks are to exit the site onto Norman Road via Lot 21 only; and
- The area adjacent to Robertson Road (excluding caretakers dwelling, main driveway and area of drainage basin required for drainage) to be landscaped.

It has been noted during DWER site inspections and through review of security video footage that the locality is susceptible to significant regional dust arising from the large areas of un-irrigated paddocks, particularly during summer months during strong easterly winds. The mitigation of regional dust is outside of the control of Permacast.

An updated Dust Management Plan has been prepared and included as part of this information package.

3. Noise and Vibration Report and Mitigation Updates:

An updated acoustic and vibration assessment is provided in the most recent report from Lloyd George Acoustics (attached).

Testing to verify earlier modelling results, endorsed and supervised by DWER occurred during November 2023.

The results of the testing are included and discussed in the updated Noise and Vibration Report. This demonstrates that the facility is able to comply with the Noise Regulations, subject to the recommendations within the assessment being implemented.

The practices and measures to address noise mitigation include the following:

- No use of the Robertson Rd entry by general Permacast staff prior to 7am;
- No staff or visitor parking to the western end of the site in proximity of Robertson Road (i.e., near the existing caretakers dwelling);
- Change out of all reversing beepers on current equipment, converting to buzzers which are mounted closer to the ground;
- Installation of a sea container wall as illustrated on the updated Development site plan to the west of SB4.;
- Modification of the manufacturing process to reduce the range and the frequency of noise and vibrations being emitted from the Stressing Bed processes. This includes reduction in vibration sections, time and frequency, the use of alternative concrete mix and the installation of noise curtains as close as possible to moulds during a pour;
- Operation of the vibrating component of a stressing bed no more than one stressing bed at a time;

- better spacing of concrete delivery truck movements so that the concrete truck staging area occurs behind noise wall rather than in exposed area;
- Hours of stressing bed vibration operations to limited to 7am to 6pm, with no activity on Sundays; and
- Concrete boom pump and concrete trucks to be positioned as far east from SB4 as practical.

4. Stormwater Management:

An updated Stormwater Management Plan has been prepared by McDowall Affleck engineers (attached).

In terms of stormwater management, in consultation with DWER, the following measures have been proposed and incorporated into an updated Stormwater Management Plan:

- Clarification of existing processes, including:
 - Confirming there is no cement and concrete production occurring as part of the Permacast activities;
 - Moulds are loaded with a prior manufactured concrete. Excess concrete is deposited to a second mould that will dry out and produce a concrete block which is then either used or recycled off site once cured. Accordingly, there is no slurry runoff;
 - The designated fixed washdown area is sealed and with capacity to accommodate 1:100 year storm events. Where mobile tool/equipment washdown is required, this occurs in a sealed mobile tank. The slurry from the mobile tank is disposed of to an approved offsite facility;
 - All stormwater in a 1:20 year event from external hardstand and production areas will be accommodated on site (which is the upper standard of the WALGA standards), with overflow to Robertson Road reserve drainage system in 1:100 year event; and
 - The drainage basins on site are not slurry pits. All drainage basins are receiving clean stormwater.
- Additional measures contemplated within the updated Stormwater Management Plan in order to address DWER requirements include:
 - All hardstand and driveway areas are to be sealed, paved or overlaid with concrete, asphalt or recycled asphalt material. Vee-drains to main driveway to be increased in capacity with regular 'check dams' to slow water speed and provide sediment mitigation;
 - All stormwater from production and laydown areas to pass through sediment traps prior to disposal into main drainage basin;
 - Main driveway stormwater to be directed to new small basin on southern side of main entry;
 - Re-routing of stormwater east of main shed from current overland disposal to the south, to be instead re-directed to the main drainage basin in the west via a new vee-drain with 'check-dams' at regular intervals along southern boundary of production area; and
 - New overflow to main drainage basin in accordance with DWER requirements.

5. Landscaping and Vegetation Management:

Additional landscaping is proposed at the western edge of the Permacast development area of the site, on the bund edges of the drainage basin and on the existing bund located immediately west of the western most acoustic barrier on the site plan. This landscaping will include screening by way of a mix of trees and shrubs, with final details contemplated to be determined by way of standard landscape plan condition on approval (similar to adjoining Lot 21 approval condition).

The Bushforever area of the Site has been clearly defined on the updated Development Site Plan and it is noted that the area immediately to the south of stressing bed 1 and 3 (but not encroaching into the Bushforever area) also includes vegetation, however, no clearing will be required to accommodate the development on the drain that is further described below.

The proposed drainage position for the east-west drain immediately north of the Bushforever site is not materially different to what has already been approved as part of the WA Premix DA. The difference is that more detail has been provided by McDowell Afleck, including to introduce "check dams" at regular intervals to slow the speed of water heading down the hill and provide assistance in sediment mitigation. Both note the upgrade would be beneficial over the existing drainage situation.

As with the eastern portion of the Permacast site, WA Premix are also currently draining into the historic drainage line which runs out in a south westerly direction into the bush forever area. This drainage line has been in place since around 1984.

The approved WA Premix Stormwater Management Plan contemplates that the existing constructed drainage line into the bush forever area will be removed, and a new drainage line will be constructed to direct water west and join up with the western drainage basin.

Page 9 of the SWMP for WA Premix notes specifically: "The swale may vary in alignment to avoid existing vegetation provided that the final alignment does not deviate more than 2-3 m from its general centreline path". This is what is also provided for in the McDowell Afleck report.

6. Bushfire Management Plan:

Bushfire management was addressed in the original Responsible Authority Report, where it was indicated that the Shire of Serpentine Jarrahdale was sufficiently satisfied that the comments providing by DFES and by the bushfire consultant in relation to the submitted bushfire management plan could be adequately responded to by way of an updated bushfire management plan. The bushfire management plan has now been updated in response to the specific items that were identified and is attached to this updated information package.

7. Statement from Permacast – Fumes and Odour:

In terms of potential odour and fumes, no unusual or concerning odour and fumes are being emitted from the site and accordingly no specialist technical report has been provided in relation to this. Further, DWER have not indicated any concerns with respect to potential emissions of odour or fumes. Permacast have provided a letter wherein they provide a clear statement confirming that there are no unusual or concerning odour and fume emissions from the Permacast activities and the letter is attached to the information package.

Conclusion:

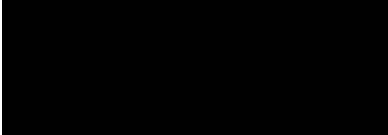
The above supplementary information and modifications to the Development Application are considered to address the issues that were identified by the Shire of Serpentine Jarrahdale in their Responsible Authority Report, and further respond to and comply with the expectations of and requests made by the DWER.

DWER have been closely involved with all aspects of the supplementary information and modifications described above.

We trust that the above supplementary information and specialist inputs and amendments to the site plans will assist the local authority and the MODAP in having the confidence to support this application.

Should any further information be required to assist in the assessment thereof, please do not hesitate to contact the undersigned.

Yours faithfully



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