



18 November 2021

The Chief Executive Officer, Shire of Serpentine-Jarrahdale
6 Paterson Street,
Mundijong WA 6123

Dear Sir,

COVER LETTER FOR APPLICATION FOR DEVELOPMENT APPROVAL PA17/950 PLASTIC PRODUCTION WORKSHOP AND WAREHOUSE – CONDITIONS AMENDMENTS

This cover letter accompanies our attached request for the variation of Conditions 7, 8, 9, 10, 12, 14, 16, 17 and 22 of the above original DA of 8 May 2018. We consider these conditions to now be onerous and restrictive and hence our request to vary or remove them.

Supporting documents include EAQ's Emissions and Odour Testing Report, Environmental Test Solutions Dust Impact Testing and Report, our Dust Management Plan, Lloyd George's Environmental Noise Report and Talis Consultants Groundwater Testing Report.

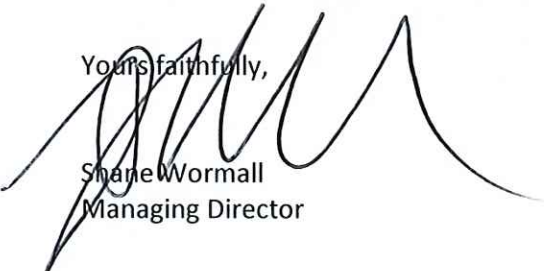
The conditions refer to the following:

- Ambient Air Quality
- Dust Impacts
- Environmental Noise
- Odour Impacts
- Production Limits
- Operating Hours
- Stockpiling of Plastic Products
- Wastewater
- Commercial Vehicle Access
- Groundwater Testing

All relevant test reports will be posted on Wormall Civil's web page and social media platforms for public viewing.

We hereby request your earliest consideration of our DA Amendment requests taking into consideration the test reports and supporting information submitted herewith.

Yours faithfully,


Shane Wormall
Managing Director



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SF-C038

Ordinary Council Meeting 21 August 2023

Application for Development Approval

PROPERTY DETAILS OF PROPOSED DEVELOPMENT		
Lot No: 41	House/Street No:17	Location No:
Diagram or Plan No: 51419	Certificate of Title Vol. No: 1455	Folio: 96
Title encumbrances (e.g easements, restrictive covenants): N/A		
Street Name: Cardup Siding Road		Suburb: Cardup
Nearest Street Intersection: South Western Highway		

PROPOSED DEVELOPMENT
Nature of Development: N/A
<input type="checkbox"/> Works <input type="checkbox"/> Use <input type="checkbox"/> Works and Use
Is an exemption from development claimed for part of the development? N / A <input type="checkbox"/> YES <input type="checkbox"/> NO
If yes, is the exemption for: <input type="checkbox"/> Works <input type="checkbox"/> Use
Application: Description of proposed works and/or land use: Proposed amendments to Development Approval No. PA 17/950 for Plastics Warehouse
DA Condition 7 – Ambient Air Quality - Variation and Clarification:
<p>Please refer to attached Emissions Testing Report from EAQ Consulting and summary:</p> <p><i>'The results for chemistry were equal to or lower than all measured values so far, including Kewdale back in 2018/2019. This is relevant for Formaldehyde. Other chemistry is of no consequence. These are measured at the stack. In terms of dispersion of distance toward the nearest receptor, these would be markedly lower than measured. They pose no risk. Odour continues to be no risk of affecting the amenity of the locality.'</i></p> <p>Please also refer to attached Dust Impact Testing and Report from Environmental Test Solutions and our Dust Management Plan.</p> <p>The Shire accepts that repeated testing has provided firm evidence that possible exceedances of trigger values causing concern, are highly unlikely to occur, therefore testing requirements to be varied as follows –</p> <p>Further testing to be undertaken only if justified by the provision of DWER recognised and accepted scientific evidence, clearly indicating non-conformance/s by our company, can be provided by the Shire or other parties at their cost.</p> <p>The intention of this variation to condition 7 is to prevent spurious claims against our company, not backed up by scientific evidence.</p> <p>Wormall Civil will post relevant environmental reports on its web page and social media platforms for public viewing.</p>

DA Condition 8 – Environmental Noise Report - Variation and Clarification:

Please refer to attached testing and report from Lloyd George Consulting.

The Shire accepts that repeated testing has provided firm evidence that possible exceedances of trigger values causing concern, are highly unlikely to occur, therefore testing requirements to be varied as follows –

Further testing to be undertaken only if justified by the provision of DWER recognised and accepted scientific evidence, clearly indicating non-conformance/s by our company, can be provided by the Shire or other parties at their cost.

The intention of this variation to condition 8 is to prevent spurious claims against our company, not backed up by scientific evidence.

Wormall Civil will post relevant environmental reports on its web page and social media platforms for public viewing.

DA Condition 9 – Odour Impact – Variation and Clarification:

As per condition 7, please refer to attached Emissions Testing Report from EAQ Consulting and summary:

'The results for chemistry were equal to or lower than all measured values so far, including Kewdale back in 2018/2019. This is relevant for Formaldehyde. Other chemistry is of no consequence.

These are measured at the stack.

In terms of dispersion of distance toward the nearest receptor, these would be markedly lower than measured.

They pose no risk.

Odour continues to be no risk of affecting the amenity of the locality.'

The Shire accepts that repeated testing has provided firm evidence that possible exceedances of trigger values causing concern, are highly unlikely to occur, therefore testing requirements to be varied as follows –

Further testing to be undertaken only if justified by the provision of DWER recognised and accepted scientific evidence, clearly indicating non-conformance/s by our company, can be provided by the Shire or other parties at their cost.

The intention of this variation to condition 9 is to prevent spurious claims against our company, not backed up by scientific evidence.

Wormall Civil will post relevant environmental reports on its web page and social media platforms for public viewing.

DA Condition 10 – Production Limits - Variation and Clarification:

Provided the company complies with all other conditions, as confirmed by the environmental testing and reports attached, there is no upper limit on the amount of products able to be produced by Smartstream Technology inside the Plastics Warehouse.

The aim is to ensure the company can operate as productively and efficiently as possible to ensure the continuous supply of its products to its local, national and international customers, whilst further contributing to the economic benefits and employment opportunities within the local community.

The previous limit of 1500 plastic products per annum is overly restrictive and onerous and is also considered a restraint on our trade and ability to expand our production capacity with resultant potential for increased employment opportunities and economic benefits for the local community.

Traffic Impacts: Smartstream Technology will not be increasing its local deliveries but will be increasing deliveries via shipping containers to the East Coast and overseas.

Currently 3 to 4 containers per month are dispatched and it is envisaged that this will increase to 6 or 8 containers per month and these will all be dispatched during the hours of 7am – 7pm.

DA Condition 12 – Operating Hours - Variation and Clarification:

24 hours machine operations inside the warehouse. There are no restrictions on operating hours provided there are no exceedances of the regulated DWER limits as specified in the respective noise, air quality, emissions and odour, dust impact study and groundwater reports attached.

Additional mitigation measures include keeping all doors closed and minimising traffic movements within the hours of 7.00pm till 6.00am Monday to Friday and from 7.00pm Friday till 7.00am Saturday. For any other operating times outside these hours, i.e. from 1.00pm Saturday till 6.00am Monday, or Public Holidays, Shire approval to be sought first.

DA Condition 14 – Stockpiling of Plastic Products:

Stockpiles of goods shall not exceed 1.8m in height within 20 metres along the eastern boundary.

Stockpiles of goods in all other areas of the site, excluding car parks and access roads are to be limited to a height of 5.4m, being the approx. height of two shipping containers when stacked on top of one another.

This is particularly the case along the southern boundary where our site borders the unoccupied Bristle/Brickworks land holding which is used for that company's Bore House and underground pipeline.

With increased planting along the eastern boundary occurring soon, this will be an effective mitigation factor by providing increased visual buffering.

DA Condition 16 – Wastewater Capture - Variation and clarification:

Wastewater produced in the cooling stage of the roto moulding process is as a result of the fine mist spray of potable water over the heated moulds and is captured and stored within a metal tray on the factory's concrete floor beneath the moulds.

This water generated from the mist is of a very limited volume (approx. 20 litres/day) and is wholly contained within the metal tray with some evaporation, therefore no wastewater is normally disposed of during the roto moulding process. The water has also been tested from inside the tray and is potable, so if the volume exceeds the tray capacity it can be safely disposed of by infiltration on site.

Please refer to attached Chem Centre Test Report and associated documents pertaining to the tests undertaken and comparisons with potable drinking water.

DA Condition 17 – Commercial Vehicle Access - Variation and clarification:

We request that the limit of 2 commercial vehicles per day be removed as it is a restraint on our ability to trade effectively. It is also onerous and overly restrictive.

As per Condition 10 we do not envisage any large increase in vehicle movements into and out of the site.

DA Condition 22 – Groundwater Testing – Variation and Clarification:

Please refer to attached report from Talis Consultants.

The Shire accepts that repeated testing has provided firm evidence that possible exceedances of trigger values causing concern, are highly unlikely to occur, therefore testing requirements to be varied as follows –

Further testing to be undertaken only if justified by the provision of DWER recognised and accepted scientific evidence, clearly indicating non-conformance/s by our company, can be provided by the Shire or other parties at their cost.

The intention of this variation to condition 22 is to prevent spurious claims against our company, not backed up by scientific evidence.

Description of exemption claimed (if relevant): N/A

Nature of any existing buildings and/or land use: N/A

Approximate cost of proposed development (Excluding GST): Nil

Estimated time of completion: N/A

Office Use Only

Fees Paid:	Date Received:
Receipt No:	Payment Method:
Application Number:	Acceptance Officers Initials:

Contact Us

Enquiries

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Email: info@sjshire.wa.gov.au

In Person

Shire of Serpentine Jarrahdale

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Open Monday to Friday 8.30am-5pm (closed public holidays)



www.sjshire.wa.gov.au