City of Greater Geraldton – Local Planning Scheme No. 1
Amendment No. 18 – Schedule of Submissions

Number	Submitter	Nature of Submission	Comment	Recommendation
1	Western Power	Unfortunately requests for general comments, feedback and approval for proposals can't be provided for without a formal application. We suggest reviewing your query against the processes referred to in our Strategic Planning web page: Using our provided mapping tools and Before You Dig Australia to locate any assets that may be affected by any proposed change or development, Consider the proposal against our Products and Services, If there are transmission assets in proximity to your work, applying via our move or remove transmission and communication assets form; and Ensuring any developers involved are aware that they will need to make an application to deal with any assets that are in the development area as well as for the power requirements for the development.	This is considered to be general development advice and the applicant will be advised accordingly.	No change be made to the amendment

City of Greater Geraldton – Local Planning Scheme No. 1
Amendment No. 18 – Schedule of Submissions

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City of Greater Geraldton – Local Planning Scheme No. 1
Amendment No. 18 – Schedule of Submissions

Number	Submitter	Nature of Submission

City of

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
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9	Department of Primary Industries and Regional Development	No objection The amendment report has adequately considered State Planning Policy 2.5 Rural Planning and assessed the potential impact on high quality agricultural land. Proposed licence and works approvals for the facility will minimise adverse impacts to neighbouring farming properties.	DPIRD comments relating to the consideration of SPP 2.5 and impact on high quality agricultural land is noted.	No change be made to the amendment in response to this submission.

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
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10	Department of Fire & Emergency Services	The referral for the above scheme amendment from the City did not include a Bushfire Management Plan. Comments provided within the planning report noting that SPP 3.7 can be assessed at future stages should be prepared as early as possible in the planning process. DFES have provided a response to the SDAU which includes comments following assessment of the bushfire management plan. It is requested that both the BMP and these comments are include this as part of the assessment of the Scheme Amendment, to ensure that bushfire is considered at this stage.	As per the comments received by DFES, *State Planning Policy 3.7 Planning in Bushfire Prone Areas* requires strategic planning proposals to consider and address high order bushfire hazard. It is noted that a completed BMP was submitted by the applicant as part of the development application to the SDAU. Table 3.5 within the scheme amendment report should be updated with an outline of the recommendations of the BMP relevant to the strategic planning phase (including any changes required as per DFES comments). This update should also address how any relevant recommendations have been met by the scheme amendment.	The amendment be modified to update Table 3.5 with any relevant Bushfire Management Plan recommendations and detail how these have been addressed.

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
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		A processing vanadium facility should not be located in close proximity to farming areas which grow food and stock sheep. Agricultural production is just as important as mining and minerals processing.	Impact Assessment and made statements that investigations have confirmed that no impacts	

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
Number	**Submitter**	**Nature of Submission**	**Comment**	**Recommendation**
		sustainable level of extraction. Given this plant will be operational for the next 25-100 years it will have a massive impact on this groundwater source and they are saying they will basically just see how the water extraction goes and make adjustments as needed which we all know will not occur once production has commenced, as it will stall mining production and report to the EPA by AVL)	(DWER). Water allocation approvals is not material planning consideration as part of the scheme amendment process.	response to this submission.
		Road network deterioration and safety. Geraldton Mt Magnet Road is already struggling to be maintained in a safe condition under the pressure of the mining trucks already using it from the mines east of Mullewa. Increased heavy and light vehicles would make this road far more unsafe than it already is. We use this road to haul our grains to port for export and an increase in movements on this road would negatively impact our efficiencies to carry out this important activity in our business.	Geraldton Mt Magnet Road is a 300km state route connecting rural producers and mining operations over an extensive area to Geraldton. Operations along 180.5 reW*nnurte	

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		impact. If a load is assessed with contaminants, then farmers will stand to lose thousands of dollars per truck load. There are already tight regulations on what chemicals we can use on the grain we produce that is all exported. These new contaminants from this facility could negatively affect the		

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
Number	**Submitter**	**Nature of Submission**	**Comment**	**Recommendation**
			It is considered that the assessment of the impact area, has not been appropriately demonstrated by the provision and evidence of technical assessments and modelling as detailed by SPP 4.1 and SPP 2.5. It must be demonstrated and confirmed that there is no loss of agricultural productivity to the surrounding land given the area is specifically used for food production. This should determine a suitable separation distance from the plant to any sensitive land use (including land for food production) and whether any statutory buffers are required to be included as part of the rezoning.	Planning and State Planning Policy 4.1 Industrial Interface.
		Rezoning this land would set a precedence for other major i1254.5		

City of Greater Geraldton – Local Planning Scheme No. 1
Amendment No. 18 – Schedule of Submissions

Number	Submitter	Nature of Submission	Comment	Recommendation

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
Number	**Submitter**	**Nature of Submission**	**Comment**	**Recommendation**

City of Greater Geraldton – Local Planning Scheme No. 1
Amendment No. 18 – Schedule of Submissions

Number	Submitter	Nature of Submission	Comment	Recommendation

Number	Submitter	Nature of Submission	Comment	Recommendation

(a) sign an annual self-declaration that it meets and complies with sustainable and responsible farm practice principles;

(b) undergo randomly selected annual on-farm audit by an ISCC certification body;

(c) demonstrate compliance by providing evidence and documentation that crops are grown using environmentally responsible practices;

(d) prove no land conversion (ie clearing of land);

(e) provide farm records for responsible chemical and fertilizer applications, contractual supply chain agreements, crop records and history;

(f) undertake responsible waste disposal;

(g) provide safe and environmentally responsible storage of chemicals in accordance with ISCC requirements;

(h) provide safe work conditions through work, health and safety compliance and staff training; and

(i) demonstrate soil conservation, erosion prevention, preservation of soil structure, protection of natural water courses and protection of groundwater

If the property cannot meet all of the required ISCC principles each year, it cannot participate in the ISCC program or export any canola from any part of the broader faming land to the premium EU market without significant price penalties.

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
Number	**Submitter**	**Nature of Submission**	**Comment**	**Recommendation**

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

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
Number	**Submitter**	**Nature of Submission**	**Comment**	**Recommendation**
		industry as a whole. Although it is evident that zonings by local and state governments are reflective of the land use, zonings are also reflective of the capacity47 (		

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
Number	**Submitter**	**Nature of Submission**	**Comment**	**Recommendation**

City of Greater Geraldton – Local Planning Scheme No. 1
Amendment No. 18 – Schedule of Submissions

Number	Submitter	Nature of Submission	Comment	Recommendation

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
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		The Proposed Plant is a mining operation being conducted in an agricultural region without the usual legislative protections that would apply to a mining operation (including appropriate approvals and compensation provisions).	The proposed plant falls within the definition of	

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
Number	**Submitter**	**Nature of Submission**	**Comment**	**Recommendation**

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Page 18 of the Rockwater Pty Ltd report (that is referred to in Appendix F - EIA) states that

> *fault, and a lack of groundwater extraction and observation data. It would be difficult to develop or calibrate a meaningful numerical groundwater model to assess the proposed extraction at Tenindewa. It is therefore recommended that an adaptive management approach is applied to the proposed borefield, whereby suitable trigger levels are assigned in consultation with the DWER and borefield operations respond to observed*

The proponent has stated that it would be difficult to develop or calibrate a meaningful numerical groundwater model to assess the proposed extraction of the Proposed Plant, and unable to properly being able to confirm what would be a sustainable and environmentally safe limit of water extraction.

Every aspect and potential future use of water should be carefully considered and confidently calculated as part of the planning process.

will cause adverse impacts on the quality and volume of groundwater supplies and that any such impacts will be irreversible.

For example, extraction of water from further afield and leaching from evaporation ponds from the Proposed Plant will further recharge the local water table and will add to and exacerbate local salinity.

In addition, if the Proposed Plant proceeds, other such industries may be attracted to the area, which would place additional pressure on

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
Number	**Submitter**	**Nature of Submission**	**Comment**	**Recommendation**
		scarce water resources.		
		The location of the plant at the lowest point may cause water erosion will traverse into adjacent land. Photos provided with submission that demonstrate water run off and soil erosion within property that has already occurred as a consequence of the project.	The management of on-site stormwater retention is applicable to the development stage of a proposal.	No change be made to the amendment in response to this submission..
		The Indarra Spring Nature Reserve abuts the eastern boundary of the Proposed Site. The proponent does not address the effects that the Proposed Plant will have on the flora, fauna and water in the Indarra Spring Nature Reserve.	The applicant has addressed the Indarra Spring Nature Reserve as part of the EIA. The Department of Biodiversity, Conservation and Attractions have not raised any concerns.	

City of Greater Geraldton – Local Planning Scheme No. 1
Amendment No. 18 – Schedule of Submissions

Number	Submitter	Nature of Submission	Comment	Recommendation

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
Number	**Submitter**	**Nature of Submission**	**Comment**	**Recommendation**
				submission.
		It would appear that ther		

City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 18 – Schedule of Submissions				
Number	**Submitter**	**Nature of Submission**	**Comment**	**Recommendation**
			planning consideration as part of the scheme amendment process.	
		There are other rural locations that could be explored, including near Pindar.		

City of Greater Geraldton – Local Planning Scheme No. 1
Amendment No. 18 – Schedule of Submissions

Number