



21 July 2022

Darren Mollenoyux, Chief Executive Officer  
Shire of Bruce Rock  
Via email: [ceo@brucerock.wa.gov.au](mailto:ceo@brucerock.wa.gov.au)

Dear Darren,

## **LOT 251 KELLERBERRIN-SHACKLETON ROAD, SHACKLETON PROPOSED GRAIN DEPOT**

CBH is seeking development approval from the Shire of Bruce Rock for a proposed grain depot located at Lot 251 Kellerberrin-Shackleton Road, Shackleton. The subject application is prepared in accordance with Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015 and the Shire of Bruce Rock Local Planning Scheme No. 3 (LPS 3).

CBH had a record harvest last year where its existing storage infrastructure was not enough to keep up with the record crop. This yield is still being held. These proposed bulkheads will assist CBH and local growers with accommodating this existing and future demand. Additional bulkheads provide further benefits to CBH than just storage as they also move grain to port quicker and allow grain to be moved around on site which can assist with reducing waiting times and keeping trucks off roads. Current modelling suggests that we will again have another big harvest this year meaning the construction and use of these bulkheads is integral to CBH's operations.

CBH is accelerating its investment in the network with over \$1 billion invested in 2.8 million tonnes of storage. With a clear goal of exporting 3 million tonnes per month by 2033, we need to continue to invest in the network at elevated levels. This enables us to improve our ability to receive harvest efficiently, sustain current assets and infrastructure and increase our focus on improving our outloading abilities during above average harvests.

### **Town Planning Considerations**

The proposed development is considered to be consistent with Clause 68 of Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015 and the provisions of the Shire of Bruce Rock LPS 3.

### Local Planning Scheme No. 3

The subject land is zoned 'rural' under the Shire's LPS 3. The existing land use class is 'agricultural-extensive' and this application seeks to change the land use to 'grain depot' which is defined as a premises for the receipt, storage, treatment, and despatch of grain however is not specifically listed as a land use within the Zoning Table of LPS 3. The change in use only applies to the portion of 'Rural' zoned land as shown on DRG No 514-ENG-CL-DCO-0009, and the balance of the land is to remain an 'agriculture-extensive' land use.

LPS 3 details site and development requirements for the rural zone specifically in relation to front, rear and side setbacks. Table 2 of LPS 3 does not stipulate a use class relevant of CBH activities and where requirements for a particular use are not set out in this Scheme the development shall conform to such requirements as the local government shall determine. The proposed bulkhead requests a front setback of roughly 240 metres from the Kellerberrin-Shackleton Road front lot boundary. There are no changes to staff numbers proposed as part of this application meaning no additional car parking bays are required.

### Shire of Bruce Rock Local Planning Strategy

The Shire of Bruce Rock Local Planning Strategy commits to continuing to protect its valuable agricultural resources and rural hinterland. Agriculture is the dominant industry sector in the Shire of Bruce Rock and is expected to remain the most significant contributor to local economic activity. The proposed grain depot is an agricultural associated land use meaning the proposal does not compromise the objectives and strategies of the Shire of Bruce Rock Local Planning Strategy or the objectives of the rural zone within LPS3 and warrants approval accordingly.

### Traffic Management

No additional traffic will be generated through the use of the three proposed bulkheads. Last years' record harvest meant a higher than expected amount of grain needed to be stored at sites prior to it going to Port. A large amount of carryover grain remains at many of these sites. If a CBH site is full and not able to accept any more local grain then operationally CBH had to bring in trucks sooner to take the stored grain to Port. The site could then accommodate the excess local grain. If this out loading does not occur and a site was full the trucks still use the road to drop grain off to a grain receipt site closer to Port.

The amount of bulkheads doesn't determine the amount of traffic generation, traffic generation is determined by grain yield which is outside of the development application process. Additional storage means traffic movements generated by a harvest are spread out over a greater period of time as grain does not need to be transported to port sooner to accommodate demand. This reduces the amount of trucks on the road network within the harvest period. Local demand and uncertain grain production are going to exist no matter what the storage capabilities of a site can accommodate.

### Stormwater Management

All stormwater drainage associated with the proposed development is to be contained and disposed of on-site. The construction of the emergency bulkheads will include a stormwater management strategy that caters for a 5-year ARI event with stormwater to be directed to the open drainage conveyance system and for all surface water to be detained on-site up to the 5-year ARI event in a detention basin.

### Noise & Dust Management

CBH shall ensure that noise from the specification and installation of any mechanical equipment as well as traffic noise does not exceed assigned levels prescribed in the *Environmental Protection (Noise) Regulations 1997*, when it is received at a neighbouring property. Should the local government consider it necessary, CBH would be supportive of a condition on development approval for noise and dust monitoring to be conducted at its Shackleton site. CBH undertakes frequent noise and dust monitoring across all its sites to ensure that dust and noise levels are measured and are mitigated whenever there is an exceedance.

### Complaints Procedure

Shackleton falls within the Kwinana South Area 13. The Area Manager for the CBH Kwinana South Area 13 manages all enquiries in relation to the CBH Shackleton site. All complaints in relation to the Shackleton site can also be submitted to the Government and Industry Relations team of CBH.

The proposed grain depot is aligned with the planning framework and is not considered to result in any new amenity impacts to the surrounding area. CBH respectfully requests the Application for Development Approval is considered by the Shire of Bruce Rock expeditiously given the straightforward nature of the application and its general compliance with the Shire's planning framework.

Yours Sincerely,



**Timothy Roberts**  
Specialist – Regulatory Approvals Adviser

**RECEIVED**

**By J Goldacre at 7:06 am, Aug 04, 2022**