

DOCUMENT TITLE

Statement of Environmental Effects

CLIENT

Manildra Group

PROJECT

Alterations and Additions to the Manildra Group Grain Handling Facility
Lot 3 DP 1220512, Tysons Road
TABBITA NSW 2652

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PROJECT REPORT DETAILS

Document Title	Statement of Environmental Effects – Alterations and Additions to the Manildra Group Grain Handling Facility on Lot 3 DP 1220512, Tysons Road, Tabbita
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Client	Manildra Group
Project Reference	APC240218

DOCUMENT STATUS

Revision	C
Status	Final
Date	30/05/2024
Authorised for issue	

DISTRIBUTION RECORD

Recipient	Date
Manildra Group	30/05/2024
NSW Planning Portal	30/05/2024



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1. Introduction

1.1. Project Scope

This Statement of Environmental Effects (SEE) has been prepared by Currajong Pty Ltd (Currajong) on behalf of the Manildra Group, the owner / operator of an existing Grain Handling Facility at Lot 3 DP 1220512, Tysons Road, Tabbita.

The existing Grain Handling Facility on Lot 3 DP 1220512 comprises five (5) bunker storages, 10 megalitre (ML) retention pond, weighbridge, sample stand, toilet amenities, onsite wastewater management system and an existing entry / exit towards the eastern end of the site on Tysons Road.

The proposed alterations and additions to the Manildra Group Tabbita Grain Handling Facility are as follows:

Stage 1 Work:

- Slight reconfiguration of Bunkers B1 to B5 approximately 15m to north to make way for an expansion of the existing detention pond.
- Enlargement of the existing 10ML detention pond to provide 19ML stormwater retention capacity.
- Construction of new internal roads to minimise traffic impacts on Tysons Road.
- Erection of a new workshop (container / awning structure) and staff amenities building (crib room) as well as the installation of new water storage tanks, car park and septic system.
- Upgrading of the existing driveway access onto Tysons Road located towards the eastern end of the site to function as the entry into the grain handling facility.
- Construction of a new driveway access onto Tysons Road towards the western end of the site to function as the exit from the grain handling facility. Roadside vegetation clearing of approximately 200m² of native vegetation would be required to accommodate the proposed new exit.
- Upgrading of culverts adjacent to the site entrance and exit under Tysons Road.
- Closure of the existing pipe draining stormwater from Lot 2 DP 1220512 into the Manildra Group site (Lot 2 DP 1220512) to allow implementation of the above.
- Maintenance of the existing weighbridge, sample stand, toilets and septic system.

Stage 2 Work:

- Installation of two new grain bunkers B6 and B7 towards the eastern portion of the site.
- Construction of new internal roads to integrate bunkers B6 and B7 with other facilities on the site.

Engineering Drawings and a Stormwater Management Plan have been prepared by Tahlee Consulting Services Pty Ltd (TCS). Building design drawings have also been prepared for the new office / amenities building and workshop. Copies of these drawings and reports have been submitted with the Development Application (DA).

1.2. Approvals Required

The proposal requires development consent under Part 4 of the Environmental Planning and Assessment Act (EP&A Act) 1979 and a DA is to be lodged with Carrathool Shire Council via the NSW Planning Portal, along with a SEE (this report) and various plans in support of the proposal.

The proposal is local development, as it does not trigger any of the provisions listed below:

- The proposal is not 'designated development' pursuant to Part 1 of Schedule 3 of the EP&A Regulation 2021 and an Environmental Impact Statement is not required.
- The proposal does not trigger 'State significant development' or 'regionally significant development' because it is not designated development and is general development less than \$30 million, pursuant to State Environmental Planning Policy (Planning Systems) 2021.
- The proposal does not trigger 'integrated development' because it does not require any other approval listed under Section 4.46 of the EP&A Act 1979.

- The proposal does not trigger the Biodiversity Offset Scheme (BOS) as proposed native vegetation clearing is below the BOS Threshold.

1.3. Format of the Report

The information presented in this SEE covers all aspects of the proposal as specified under the EP&A Regulation 2021. The SEE has been prepared as a single document of several sections as follows:

Section 1	Introduces the proposal and the main project drivers
Section 2	Describes the main features of the site and surrounds
Section 3	Provides a description of the existing development
Section 4	Provides a description of the proposal, including a description of proposed new buildings and civil works and changes to operations
Section 5	Reviews the proposal against the relevant legislative requirements
Section 6	Assesses the potential impacts of the proposal and documents the proposed mitigation and management strategies proposed to minimise environmental impacts
Section 7	Reviews the proposal against the environmental, economic and social considerations
Section 8	Provides the conclusion for the SEE

The SEE is supported by the following documents, which are separately attached to this SEE:

- Lot 3 DP 1220512 Land Title and Section 88B Instrument.
- TSC DA Plans, dated 27 May 2024.
- TCS Engineering Drawings, dated 28 May 2024.
- TCS Stormwater Management Report, dated 29 May 2024.
- SJL Consulting Engineers Workshop Structural Drawings, dated 12 April 2024.
- Redipodhouse Crib Room Drawings, dated March 2024.
- Currajong Workshop Site Plan and Elevation Drawings, dated April 2024.
- Currajong Site Plan of Manildra Group Administration Precinct, dated March 2024.
- Currajong Traffic Impact Assessment, dated 12 March 2024.



2. DEVELOPMENT SITE DESCRIPTION

2.1. Site Description

The subject land is described as Lot 3 DP 1220512, Tysons Road, Tabbita. The site is located in the Carrathool Shire, approximately 650m east of the settlement of Tabbita.

The site has access to Tysons Road which is a local road managed by Carrathool Shire Council. Tyson Road links to the Kidman Way (approximately 550m west of the site), which is a State Road managed by TfNSW. The Temora Roto Railway is also located to the west of the site, with a level crossing of Tysons Road located approximately 400m west of the Manildra Group Grain Handling Facility and a further 150m north-east of the Kidman Way.

Key features of the site and its existing environs are as follows:

- The total area of the site is approximately 14.85ha.
- The site is generally cleared of native vegetation.
- The land is fenced along all boundaries with standard post and wire fencing.
- There are existing grain storage bunkers, weighbridge, sample stand, workshop, amenities and stormwater management facilities on the site.
- The land has frontage to Tysons Road, which is a two-way bitumen sealed local road with a railway level crossing approximately 150m east of Kidman Way and formed table drains and native vegetation within the road reserve.
- The land is not shown as flood affected or bushfire prone on available mapping.

Figure 1 shows the location of the Manildra Group Grain Handling Facility in relation to roads and railways and Tabbita.

Figure 1 – Lot 3 DP 1220512, Tysons Road, Tabbita



Source: Six Maps



2.2. Surrounding Land-use

Lot 3 DP 1220512 is owned by the Manildra Group and used for grain storage and handling purposes.

Adjoining land to the west is used for similar grain storage and handling operations. Land to the north, east and south is used for broadacre farming purposes. The settlement of Tabbita is located further west.

There are no watercourses within proximity of the site. The Barren Box Swamp is located approximately 2km to the south. The nearest residence to the site is located approximately 300m to the south-west, in between Kidman Way and the Temora Roto Railway line.

2.3. Land Zoning

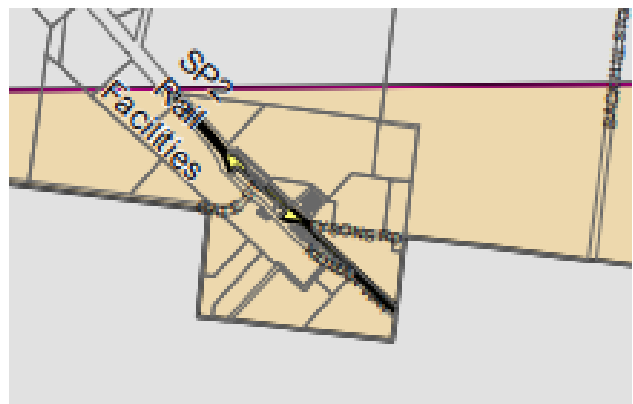
The site is zoned RU1 Primary Production under the Carrathool Local Environmental Plan (LEP) 2012.

Figure 2 shows the zoning framework applying to the subject land and surrounding sites under Carrathool LEP 2012.

Figure 2 – Zoning Map

Zone

E1	National Parks and Nature Reserves
IN1	General Industrial
R5	Large Lot Residential
RU1	Primary Production
RU3	Forestry
RU5	Village
SP2	Infrastructure



3. EXISTING DEVELOPMENT DESCRIPTION

3.1. Description of Existing / Approved Facilities

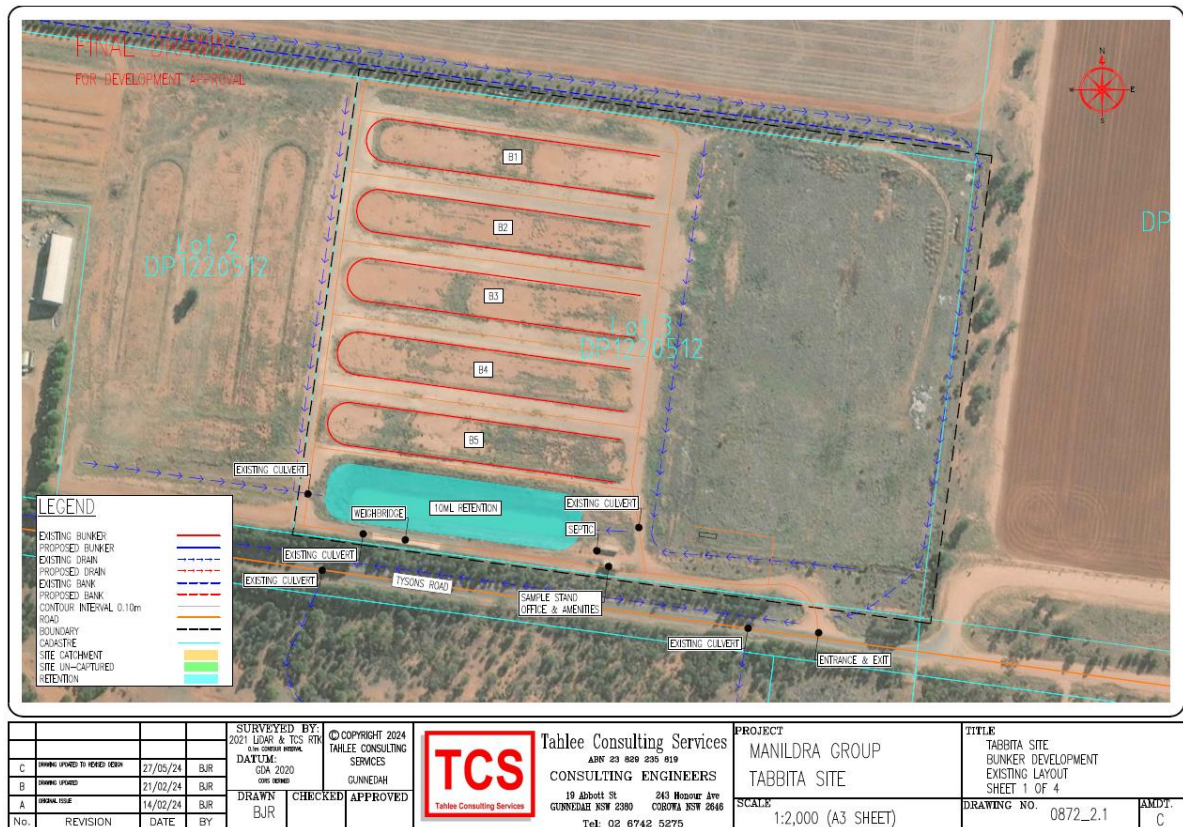
The Manildra Group Grain Handling Facility at Tabbita was first established by Riverina Grain. In the past, the facility has stored on average around 72,000 tonnes of grain per annum within five (5) bunkers.

A breakdown of works already established on the site is as follows:

- Ground level bunker storages x 5, with a total storage capacity of approximately 94,000 tonnes.
- Miscellaneous buildings, including a sample stand, toilet, septic system, generator and slab.
- Onsite wastewater management system installed next to existing sampling stand.
- Weighbridge capable of handling a 36.5m road train.
- Associated earthworks, roadworks and drainage.
- Access to Tysons Road and internal roads.

The TCS plans show the existing facilities on the site, with Drawing No. 0872_2.1 Existing Layout Sheet shown in Figure 4 below: is provided in Figure 3 below:

Figure 3 – Existing Site Layout Plan



The Manildra Group purchased the site from Riverina Grain in 2023 and have subsequently operated the facility (as existing) during the 23/24 season, where a total of 94,000 tonnes was handled at the site.



4. DESCRIPTION OF THE PROPOSAL

4.1. Objectives of the Project

The primary objective for the project is to obtain consent for alterations and additions to the existing grain handling facility established on Lot 3 DP 1220512.

4.2. Need for the Project

According to the Federal Government Department of Agriculture, Water and the Environment, total winter crop production in NSW was forecast to reach 10.3 million tonnes in 2023–24, with a high percentage of crop production in NSW is coming out of the southern half of the state, including the Western Riverina. Summer crop production in NSW is also estimated to increase in 2024, well above the 10-year average.

Tabbita is located in the Western Riverina, approximately 30km north-west of Griffith. The region is highly conducive to producing large crops given the land is relatively flat and temperatures are warm. Irrigation is also established in the region which provides some extra flexibilities and securities in the growing of crops. The region is capable of producing large volume crops of wheat, barley and canola. Other common crops include corn, oats, triticale and pulse crops.

The Manildra Group have identified a need to improve operational efficiencies at their Tabbita Grain Handling Facility to allow the company to handle expected increased crop production in the sub-region and to meet growing demand for grain at their Manildra, Narrandera and Nowra Flour Mills. The proposal would enable the Manildra Group to store up to 150,000 tonnes of grain at the facility, with improved onsite truck manoeuvring and unloading facilities and drainage at the site.

Once the proposed access, bunkers and drainage facilities are installed, the Manildra Group Tabbita Grain Handling Facility will continue to operate as existing, and up to a capacity of 150,000 tonnes of grain storage per year.

4.3. The Proposal

4.3.1. Use

The proposal seeks to obtain consent for alterations and additions to the Manildra Group Grain Handling Facility at Tabbita to allow for additional bunker storages at the site as well as improved access, drainage, workshop and staff amenities at the facility. Once alterations and additions are completed, the Manildra Group Grain Handling Facility is proposed to operate at a storage capacity of 150,000 tonnes per annum.

4.3.2. Buildings / Civil Construction Works

A description of the proposed building works associated with the development is as follows:

Stage 1 Work:

- Slight reconfiguration of Bunkers B1 to B5 approximately 15m to north to make way for an expansion of the existing detention pond.
- Enlargement of the existing 10ML detention pond to provide 19ML stormwater retention capacity.
- Construction of new internal roads to minimise traffic impacts on Tysons Road.
- Erection of a new workshop (container / awning structure) and staff amenities building (crib room) as well as the installation of new water storage tanks, car park and septic system.
- Upgrading of the existing driveway access onto Tysons Road located towards the eastern end of the site to function as the entry into the grain handling facility.
- Construction of a new driveway access onto Tysons Road towards the western end of the site to function as the exit from the grain handling facility. Roadside vegetation clearing of approximately 200m² of native vegetation would be required to accommodate the proposed new exit.
- Upgrading of culverts adjacent to the site entrance and exit under Tysons Road.
- Maintenance of the existing weighbridge, sample stand, toilets and septic system.

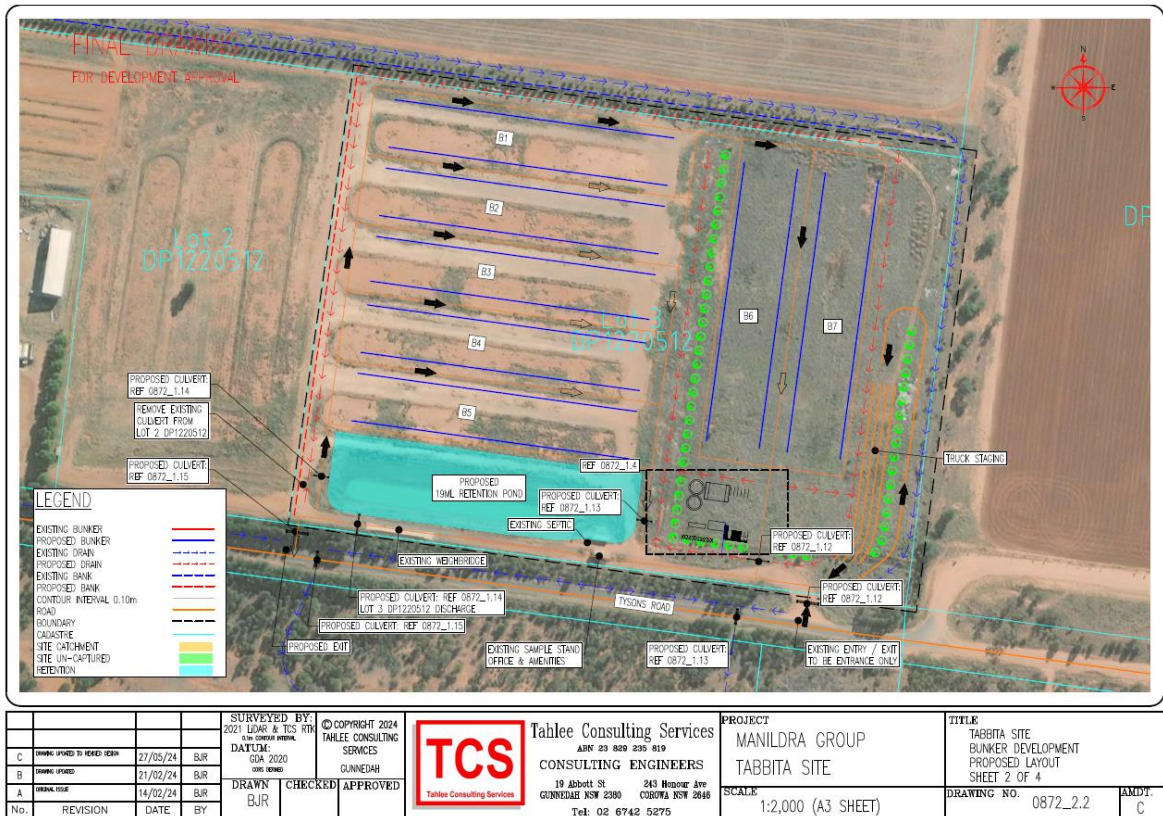
- Closure of the existing pipe draining stormwater from Lot 2 DP 1220512 into the Manildra Group site (Lot 2 DP 1220512) to allow implementation of the above.

Stage 2 Work:

- Installation of two new grain bunkers B6 and B7 towards the eastern portion of the site.
- Construction of new internal roads to integrate bunkers B6 and B7 with other facilities on the site.

The TCS plans show the proposed new works, with Drawing No. 0872_2.2: Proposed Layout Sheet shown in Figure 4 below:

Figure 4 – Proposed Site Layout Plan



4.3.3. Staging

The proposed development involves two stages as follows:

Stage 1 Work:

- Slight reconfiguration of Bunkers B1 to B5 approximately 15m to north to make way for an expansion of the existing detention pond.
- Enlargement of the existing 10ML detention pond to provide 19ML stormwater retention capacity.
- Construction of new internal roads to minimise traffic impacts on Tysons Road.
- Erection of a new workshop (container / awning structure) and staff amenities building (crib room) as well as the installation of new water storage tanks, car park and septic system.
- Upgrading of the existing driveway access onto Tysons Road located towards the eastern end of the site to function as the entry into the grain handling facility.
- Construction of a new driveway access onto Tysons Road towards the western end of the site to function as the exit from the grain handling facility. Roadside vegetation clearing of approximately 200m² of native vegetation would be required to accommodate the proposed new exit.



- Upgrading of culverts adjacent to the site entrance and exit under Tysons Road.
- Maintenance of the existing weighbridge, sample stand, toilets and septic system.
- Closure of the existing pipe draining stormwater from Lot 2 DP 1220512 into the Manildra Group site (Lot 2 DP 1220512) to allow implementation of the above.

Stage 2 Work:

- Installation of two new grain bunkers B6 and B7 towards the eastern portion of the site.
- Construction of new internal roads to integrate bunkers B6 and B7 with other facilities on the site.

4.3.4. Subdivision Works

There are no subdivision works proposed.



5. PLANNING AND LEGISLATIVE CONTEXT

The following section of the report describes the applicable local planning policies, State and Federal legislation and guidelines. The applicable documents are summarised in this section, followed by a statement outlining how the development will address and / or comply with the legislation or policy.

5.1. Commonwealth Legislation

Under the Federal Environment Protection and Biodiversity Conservation Act (EPBC Act) 1999, referral is required to the Australian Government for proposed actions that have the potential to significantly impact on Matters of National Environmental Significance (MNES) or the environment of Commonwealth land. The EPBC Act 1999 identifies the following as matters of national environmental significance for which Ministerial approval is required:

- World heritage properties.
- Wetlands of international significance.
- Listed threatened species and communities.
- Listed migratory species protected under international agreements.
- National Heritage Places.
- Protection of the environment from nuclear actions.
- Commonwealth Marine environments.

Assessment of the proposal's impact on MNES confirms there is unlikely to be a significant impact on relevant MNES or on Commonwealth land. Accordingly, the proposal does not warrant referral under the EPBC Act 1999.

5.2. New South Wales Legislation

5.2.1. Environmental Planning and Assessment Act 1979

The EP&A Act 1979 forms the legal and policy platform for development assessment and approvals process in NSW. The objects of the Act are:

- a) To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources.
- b) To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment.
- c) To promote the orderly and economic use and development of land.
- d) To promote the delivery and maintenance of affordable housing.
- e) To protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats.
- f) To promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),
- g) To promote good design and amenity of the built environment.
- h) To promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants.
- i) To promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State.
- j) To provide increased opportunity for community participation in environmental planning and assessment.

Under the EP&A Act 1979, environmental planning instruments are made to specify planning controls for specific parcels of land and / or land-use. Applicable environmental planning instruments are discussed in later parts of this SEE. In general, development consent is required for the proposed alterations and additions to an agricultural produce industry, pursuant to the Carrathool Local Environmental Plan 2012.

5.2.2. Local Government Act 1993

Section 68 of the Local Government Act 1993 (LG Act) specifies that approval is required for a number of activities carried out on operational land, including:

- Structures or places of public entertainment.
- Water supply, sewerage and stormwater drainage work.
- Management of trade waste in the sewerage system.
- Swinging or hoist goods over a public road.

An approval for plumbing and drainage and the installation and operation of a new onsite wastewater management system will need to be obtained from Carrathool Shire Council. It is intended that the required LG approvals will be obtained prior to the issue of a Construction Certificate for the proposed new crib room and workshop building.

5.2.3. Heritage Act 1977

The Heritage Act 1977 provides for the conservation of environmental heritage defined as places, buildings, works, relics, moveable objects, and precincts, of State or local heritage significance which are at least 50 years old. The Act applies to non-Aboriginal relics only, as Aboriginal relics are protected under the National Parks and Wildlife Act 1974. The subject site is not listed on the State Heritage Register and an approval from Heritage NSW is not required under the Heritage Act 1977. The site is also not listed as a Heritage Item under the Carrathool LEP 2012. Heritage issues are assessed under Section 6 of this report. In general, no heritage issues / impacts have been assessed to apply, and an approval under the Heritage Act 1977 is not required to be obtained for the proposal.

5.2.4. National Parks and Wildlife Act 1974

The National Parks and Wildlife Act (NPW Act) 1974 is administered by the Office of Environment and Heritage and provides the basis for the legal protection of flora and fauna in NSW.

Unless a licence is obtained under the NPW Act 1974 (or the Threatened Species Conservation Act 1995), it is an offence to harm any animal that is protected or is a threatened species, population or ecological community. It is also an offence to pick any plant that is protected or is a threatened species, population or ecological community. In addition, a person must not, by act or omission, damage any critical habitat.

The NPW Act 1974 also provides the basis for the legal protection and management of Aboriginal sites within NSW. Sections 86, 90 and 91 of the NPW Act provide statutory protection for any physical / material evidence of Aboriginal occupation of NSW and places of cultural significance to the Aboriginal community.

The site largely comprises 'disturbed land' as defined under The NPW Regulation 2019. Aboriginal cultural heritage issues are assessed under Section 6 of this SEE. The grain receival uses has resulted in changes of landform throughout the site, including bunkers, drainage swales and water storages, roads and fencing. The adjoining roadside vegetation comprises a mix of native vegetation and regrowth vegetation (post 1990). Inspection of the site and roadside vegetation at existing / proposed site entrances does not reveal any evidence of Aboriginal cultural sites or habitat for threatened species.

In general, no threatened species or Aboriginal cultural heritage issues / impacts have been assessed to apply, and an approval under the Heritage Act 1977 or NPW Act 1974 is not required to be obtained for the proposed alterations and additions to the agricultural produce industry.

5.2.5. Biodiversity Conservation Act 2016

The Biodiversity Conservation Act (BC Act) 2016 provides the framework for the management of flora and fauna on lands within NSW. Under the BC Act 2016 the principles of ecologically sustainable development are used to achieve the conservation and protection of biodiversity values. Clause 7.2 of the BC Act 2016 identifies the following circumstances where a development is likely to significantly affect threatened species:

- a) It is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or
- b) The development exceeds the biodiversity offsets scheme threshold if the biodiversity offset scheme applies to the impacts of the development on biodiversity values, or
- c) It is carried out in a declared area of outstanding biodiversity value.

The site of the Manildra Group Grain Handling Facility at Tabbita is generally cleared of native vegetation. A section of native vegetation within the Tysons Road reserve is proposed to be removed to make way for a new exit from the Manildra Group Grain Handling Facility. The estimated total area of vegetation clearing is approximately 200m² which would be undertaken under controlled conditions, as detailed in a Section 138 Permit to be lodged with Carrathool Shire Council.

Tests of significance completed for the site (including proposed new access clearing works) conclude the proposal is unlikely to cause significant impacts to any threatened species and does not trigger entry into the BOS. There is consequently no requirement for the proponent to offset biodiversity impacts associated with this proposal or to prepare a Biodiversity Development Assessment Report (BDAR).

5.2.6. Roads Act 2016

Under Section 138 of the Roads Act 1993 a person must not erect a structure or carry out a work in, on or over a public road, or dig up or disturb the surface of a public road, otherwise than with the consent of the appropriate road authority. A new exit is proposed towards the western end of the site, which will require an approval under the Roads Act 1993. It is intended that the required Roads Act 1993 approvals will be obtained prior to the issue of a Construction Certificate for the proposed new crib room and workshop building.

5.2.7. Protection of the Environment Operations Act 1997

The Protection of the Environment Operations Act (POEO Act) 1997 regulates air, noise, land and water pollution. The existing grain handling facility does not operate under an Environment Protection Licence (EPL) and Carrathool Shire Council is the Appropriate Regulatory Authority (ARA) for general pollution control matters in the Carrathool Shire. No licence approvals are required.

5.2.8. Work Health and Safety Act 2011

The management and handling of hazardous substances and dangerous goods in NSW is controlled under the Work Health and Safety Act 2011 and the Work Health and Safety Regulation 2011. There are also Hazardous and Offensive Development Application Guidelines published by the Department of Planning, Industry and Environment that apply in NSW. No hazardous or offensive goods are currently stored or handled at the site in large quantities. Any handling of fuel, oils and chemicals is temporary in nature and carefully limited / managed by Manildra Group staff or approved contractors. A specific approval under this legislation and policy framework is not required to be obtained for the proposal.

5.2.9. Water Management Act 2000

The objective of the Water Management Act (WM Act) 2000 is the sustainable and integrated management of the State's water sources for the benefit of both present and future generations by applying the principles of ecologically sustainable development to protect, enhance and restore water sources and their associated ecosystems, ecological processes and biological diversity and their water quality.

The objectives of the WM Act 2000 were considered throughout the planning and design phases of this development and as detailed in this SEE. The development is not expected to intercept groundwater and is well setback from natural watercourses. Construction of the stormwater management pond will be within the maximum harvestable rights for the site. Water impacts are addressed in Section 6 of this SEE. In general, no specific approvals are required under the WM Act 2000

5.2.10. Rural Fires Act 1997

The Rural Fires Act (RF Act) 1997 requires approval of development on bushfire prone land as identified by a bushfire prone land map prepared under Section 10.3 of the EP&A Act 1979. Review of the Rural Fire Service website indicates the grain handling facility site is not located on land comprising bushfire prone land. Bushfire risk is addressed in Section 6 of this report. In general, no specific impact mitigation or approvals are required under the RF Act 1997 to manage bushfire risk. The Manildra Group have adopted emergency management plans, including emergency response to dealing with fires.

5.2.11. Noxious Weeds Act 1993

The Noxious Weeds Act (NW Act) 1993 provides for the declaration of noxious weeds by the Minister for Primary Industries. Noxious weeds may be considered noxious on a National, State, Regional or Local scale. All private landowners, occupiers, public authorities and Councils are required to control noxious weeds on their land under Part 3 Division 1 of the NW Act. Weed management is addressed in Section 6 of this SEE. In general, no specific impact mitigation or approvals are required under the NW Act 1993 to manage noxious weeds.

5.2.12. Contaminated Land Management Act 1997

Carrathool Shire Council is required to notify the EPA if contamination is discovered that presents a significant risk of harm. Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997 are available on the EPA website. EPA notification is not required to be obtained for the proposed activities at the subject site.

5.3. State Environmental Planning Policies (SEPP)

A high-level assessment of the applicability of each SEPP to the proposed development is included in Table 1, with further assessment work completed in Section 5.3.1 as necessary.

Table 1 – SEPP Overview

Name of SEPP	Applicability
SEPP (Exempt & Complying Development Codes) 2008	Yes. See Section 5.3.1
SEPP (Planning Systems) 2021	Yes. See Section 5.3.1
SEPP (Biodiversity and Conservation) 2021	Yes. See Section 5.3.1
SEPP (BASIX) 2004	N/A
SEPP (Housing) 2021	N/A
SEPP (Industry and Employment) 2021	N/A
SEPP 65 (Design Quality of Residential Apart. Development)	N/A
SEPP (Primary Production) 2021	Yes. See Section 5.3.1
SEPP (Precincts - Central River City) 2021	N/A
SEPP (Precincts - Eastern Harbour City) 2021	N/A
SEPP (Precincts - Western Parkland City) 2021	N/A
SEPP (Precincts - Regional) 2021	N/A
SEPP (Resilience and Hazards) 2021	Yes. See Section 5.3.1
SEPP (Resources and Energy) 2021	N/A
SEPP (Transport and Infrastructure) 2021	Yes. See Section 5.3.1

5.3.1. SEPP Assessment

SEPP – Exempt and Complying Development Codes 2008

The Exempt and Complying Development Codes SEPP 2008 permits certain activities without consent or by issue of a Complying Development Certificate. The proposal is neither exempt or complying development, and development consent is sought for the proposal.

SEPP – Planning Systems 2021

The Planning Systems SEPP 2021 identifies significant development and infrastructure and confer functions on Planning Panels to determine development applications. The proposal is not classified as ‘State significant development’ or ‘regionally significant development’ and will be assessed and determined by Carrathool Shire Council as local development.

SEPP – Biodiversity and Conservation 2021

The Biodiversity and Conservation SEPP 2021 aims to protect the biodiversity values of trees and other vegetation in non-rural areas of the State and preserve the amenity of non-rural areas of the State through the preservation of trees and other vegetation. Provisions protecting bushland, trees, heritage items, waterways, wetlands and koalas are included in the SEPP. An assessment of relevant issues is provided in Section 6 of this report. In general, no specific impact mitigation or approvals are required under the Biodiversity and Conservation SEPP 2021.



SEPP - Primary Production 2021

The Primary Production SEPP 2021 aims to facilitate the orderly development of lands for primary production. The site is not State significant agricultural land and does not involve the creation of artificial waterbodies on environmentally sensitive land.

SEPP – Resilience and Hazards 2021

The Resilience and Hazards SEPP 2021 requires that a consent authority must consider the contamination potential of the land, and if the land is contaminated, it is satisfied that the land is suitable for the development in its contaminated state, or that appropriate arrangements have been made to remediate the site prior to the development being carried out. There are no known site history issues that are likely to give rise to concerns relating to potential site contamination. EPA notification is not required to be undertaken by Council and the site is suitable for its intended agricultural produce industry use.

SEPP (Transport and Infrastructure) 2021

There are provisions contained within the Transport and Infrastructure SEPP 2021 which are triggers for the referral of the DA to certain authorities prior to Council being able to grant consent. With particular regard to the nature of the development proposed by this DA, the potential triggers for referral are summarised as follows:

Development Likely to affect an electricity transmission or distribution network

Clause 2.48 of the Transport and Infrastructure SEPP requires Council to give written notice to the electricity supply authority (and consider any response received within 21 days) when a DA involves development that comprises of involves:

- The penetration of ground within 2m of an underground electricity power line or an electricity distribution pole or within 10m of any part of an electricity tower,
- Development carried out within or immediately adjacent to an easement for electricity purposes or substation, or within 5 metres of an exposed overhead electricity power line.
- Development involving the installation of a swimming pool within 30m of a structure supporting an overhead transmission line, or within 5m of an overhead electricity power line.
- Development involving or requiring the placement of power lines underground.

Based on a review of the plans and documents submitted with the DA, the proposal does not trigger referral to the electrical supply authority.

Development in or adjacent to road corridors and road reservations

Clause 2.122 of the Transport and Infrastructure SEPP 2021 requires Council to give written notice to Transport for NSW (and consider any response received within 21 days) when a DA involves traffic generating development of a kind specified in Column 1 of Schedule 3 of the SEPP. The nature and scale of the proposed development does not trigger referral of the application under the SEPP.

5.4. Local Environmental Plans

5.4.1. Carrathool Local Environmental Plan

The Carrathool LEP 2012 applies to the land. The site of the proposed development is zoned RU1 Primary Production.

The Manildra Group Grain Handling Facility is defined as ‘agricultural produce industry’ under the Carrathool LEP 2012, as follows:

‘Agricultural produce industry means a building or place used for the handling, treating, processing or packing, for commercial purposes, of produce from agriculture (including dairy products, fruit, vegetables or other plant material), and includes wineries, flour mills, cotton oil plants, cotton gins, feed mills, cheese and butter factories, and juicing or canning plants, but does not include a livestock processing industry.’

Agricultural produce industries are permitted within the RU1 Primary Production zone with development consent.

An assessment has been completed to determine the potential applicability of key clauses in the Carrathool LEP 2012 to the proposed development. This work is presented in Table 5. Where it is identified that a clause of Carrathool LEP 2012 applies to the proposed development, this assessment work is presented in Section 5.4.1.

Table 2 – Preliminary LEP Assessment

LEP Clause	Clause Name	Applicability
1.9A	Suspension of covenants, agreements & instruments	N/A
2.3	Zone objectives	Yes. See Section 5.4.2
2.5	Additional permitted uses for particular land	N/A
2.6	Subdivision - consent requirements	N/A
2.7	Demolition requires development consent	Yes. See Section 5.4.2
2.8	Temporary use of land	N/A
4.1	Minimum subdivision lot size	N/A
4.1AA	Minimum subdivision lot size for community title schemes	N/A
4.1B	Minimum subdivision lot size for certain split zones	N/A
4.2	Rural subdivision	N/A
4.2A	Erection of dwelling-houses on certain rural and residential zones	N/A
4.2B	Erection of rural workers dwellings in zone RU1	N/A
4.6	Exceptions to development standards	N/A
5.1	Relevant acquisition authority	N/A
5.2	Classification and reclassification of public land	N/A
5.3	Development near zone boundaries	N/A
5.4	Controls relating to miscellaneous uses	N/A
5.5	Controls relating to secondary dwellings on land in a rural zone	N/A
5.8	Conversion of fire alarms	N/A
5.10	Heritage Conservation	N/A
5.11	Bushfire Hazard Reduction	N/A
5.12	Infrastructure development and use of existing buildings of the Crown	N/A
5.13	Eco-tourist facilities	N/A
5.16	Subdivision of, or dwellings on, land in certain zones	N/A
5.18	Intensive livestock agriculture	N/A
5.19	Pond-based, tank based and oyster aquaculture	N/A
5.20	Standards that cannot be used to refuse consent - playing music	N/A
5.21	Flood planning	N/A
6.1	Earthworks	Yes. See Section 5.4.2
6.3	Terrestrial Biodiversity	N/A
6.4	Groundwater Vulnerability	N/A
6.5	Riparian Lands and Watercourses	N/A
6.6	Wetlands	N/A
6.7	Essential Services	Yes. See Section 5.4.2



5.4.2. Assessment of LEP Provisions

Zone objectives

The objectives of the zone RU1 Primary Production are:

- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.
- To encourage diversity in primary industry enterprises and systems appropriate for the area.
- To minimise the fragmentation and alienation of resource lands.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To facilitate farm adjustments.
- To enable agricultural support facilities to be carried out on land within the zone in a manner which does not significantly reduce the agricultural and horticultural production potential of land in the locality.
- To encourage eco-tourist facilities and tourist and visitor accommodation that minimise any adverse effect on primary industry production and scenic amenity of the area.

The proposed development is for alterations and additions to an existing agricultural produce industry (grain handling facility). The proposal is permissible with consent on land zoned RU1 Primary Production. The proposal will improve the viability of the Manildra Group Grain Handling Facility at Tabbita and contribute / support general employment in the area on farms and at the grain handling facility. The proposal has been carefully designed to respond to existing site conditions, adjoining land-use and the natural resources of the area. The proposal is not considered to conflict with the adjoining land-uses, roads, railways or other resource assets based on the assessments undertaken as part of this SEE. The nearest residence to the site is located approximately 300m to the south-west. The proposed development is considered to be consistent with the objectives of the RU1 Primary Production zone.

Clause 2.7 Demolition Requires Consent

Slight reconfiguration of Bunkers B1 to B5 is proposed to make way for the expansion of the retention pond. These works would require relocation of bunker walls which could technically be construed as demolition requiring consent. Full details of proposed works are shown on the TCS plans to enable Carrathool Shire Council to determine the full scope of the proposal.

Clause 6.1 Earthworks

The objective of Clause 6.1 is to ensure that earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land. The proposed development involves earthworks to build new bunkers, enlarge the detention pond, building a new exit onto Tysons Road, build internal roads and upgrade drainage facilities on the site and at Tysons Road. Before granting development consent for earthworks, the following issues must be considered:

- The likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development.
- The effect of the development on the likely future use or redevelopment of the land.
- The quality of the fill or the soil to be excavated, or both.
- The effect of the development on the existing and likely amenity of adjoining properties.
- The source of any fill material and the destination of any excavated material.
- The likelihood of disturbing relics.
- The proximity to, and potential for adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area.
- Any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.

A key aspect of proposed alterations and additions at the Manildra Group Grain Handling Facility at Tabbita is the intended closure of an existing pipe draining stormwater from the adjoining Lot 2 DP 1220512 to the west. Review of the Land Title details relating to Lots 2 and 3 DP 1220512 does not reveal any legal requirement for the Manildra Group to accept

stormwater from Lot 2 DP 1220512. The proposed closure of the existing stormwater pipe between Lots 2 and 3 DP 1220512 has been raised with Carrathool Shire Council planning staff via email on 22 January 2024 and a follow-up telephone meeting on 23 February 2024, with advice to lodge the DA accordingly.

Given that proposed earthworks have the potential to impact on surrounding land (if not properly managed), the Manildra Group has engaged TCS to prepare engineering plans of proposed earthworks as well as to provide a stormwater management plan and report dated 21 February 2024 (version B). Key features of the TCS engineering drawings are as follows:

- The earthworks and stormwater control measures proposed by TCS are considered to be appropriate in the circumstances and based on robust civil engineering and stormwater management calculations.
- Road drainage improvements are proposed with the provision of additional culverts on Tysons Road, subject to approval of such works by Carrathool Shire Council under a Section 138 Permit.
- All imported road base and other fill materials brought onto the site will be sourced from a local supplier and certified as clean material (VENM).
- No impacts on natural watercourses, drinking water catchments or environmentally sensitive areas are assessed to apply.
- Appropriate searches of the AHIMS database have not identified any recorded items within a 50m buffer of the subject land.

By implementing the TCS engineering drawings it is assessed drainage impacts would be reduced to acceptable levels in and around the Manildra Group Grain Handling Facility.

Clause 6.7 - Essential Services

Clause 6.7 of Carrathool LEP 2012 requires that development consent must not be granted to development unless the consent authority is satisfied that any of the following services that are essential for the development, or available or that adequate arrangements have been made to make them available when required:

- The supply of water.
- The supply of electricity.
- The disposal and management of sewage.
- Stormwater drainage or on-site conservation.
- Suitable vehicle access.

The proposed development complies with the requirements for Clause 6.7 as follows:

- Existing electrical supply infrastructure is available to the site / new structures. New connections are subject to further enquiry and application with the relevant service authority.
- A new onsite wastewater management system is proposed to manage waste generated from the office / amenities.
- Stormwater is proposed to be managed via swales to discharge to the onsite detention pond.
- Practical and legal access to the grain handling facility is to be provided directly from Tysons Road, which is an existing public road that is owned and maintained by Carrathool Shire Council. Upgrades to the existing access and a new access driveway are proposed.

The proposed development is capable of being connected to essential services in accordance with the requirements of Clause 6.7.

6. ASSESSMENT OF ENVIRONMENTAL ISSUES

The main environmental issues that have been raised and investigated as part of the design process for the proposed development have been documented in this section. Each issue is investigated by way of introducing the key issue(s), documenting existing conditions, assessing impacts and proposing management and mitigation measures.

6.1. Visual Impacts and Amenity

6.1.1. Assessment of Existing Conditions

The site sits within a context of rural land-uses east of Tabbita and the Kidman Way. The site has an area of approximately 14.85ha and comprises existing grain receival and storage facilities as well as associated roads and drainage infrastructure. The site is zoned RU1 Primary Production and is surrounded by broadacre farming properties to the north, east and south and grain handling facilities to the west. While the site is screened by roadside vegetation, views of the site are possible from nearby farms, public roads and railways. The site contains existing grain bunkers that are typical of grain handling facilities in the region.

6.1.2. Assessment of Potential Impact

The proposal will lead to minor changes in the rural landscape to a certain extent, with the collocation of new bunkers, enlargement of existing detention pond and erection of new buildings and a new access onto Tysons Road.

The proposed development will result in two (2) additional bunkers, enlargement of a detention pond, erection of new buildings and an access onto Tysons Road. The grouping of proposed new grain handling facilities and their proposed location and the distances from surrounding roads, railways and farms will help to minimise any visual impacts as viewed off-site. Required road access and drainage works will involve limited clearing of approximately 200m² of native vegetation and earthworks in the Tysons Road reserve. The nature and scale of proposed works are generally consistent with the existing land-use in the locality, and it is assessed that visual impacts will be acceptable in the circumstances.

6.1.3. Management and Mitigation

No additional mitigation measures are proposed, other than maintenance of existing vegetation around the perimeter of the site, wherever possible.

6.2. Building Code Compliance

6.2.1. Assessment of Existing Condition

The proposal sits within a context of the Manildra Group Tabbita Grain Handling Facility. The total area of the site is approximately 14.85ha. The existing Grain Handling Facility is located on Lot 3 DP 1220512. It comprises five (5) bunker storages, 10 megalitre (ML) retention pond, weighbridge, sample stand, toilet amenities, onsite wastewater management system and an existing entry / exit towards the eastern end of the site on Tysons Road. In general, existing buildings and structures comprise earthen, concrete and metal structures.

6.2.2. Assessment of Potential Impact

The proposal involves construction of a new buildings and structures in and around existing buildings, structures and hardstand areas within the Manildra Group Tabbita Grain Handling Facility. Building design drawings have been progressed to a point where it is possible to present the preliminary findings of the assessment of the proposal against the Building Code of Australia (BCA) in the SEE.

The proposed new building work comprises single storey construction, with materials generally of concrete, steel and sheet metal. General assessment of all buildings and structures indicates that all proposed buildings will be sufficiently setback and designed to comply with the BCA (as per their building classification). A more detailed breakdown of individual building design requirements is provided below:

- **Workshop building** - involves the installation of two (2) shipping containers on concrete footings and the construction of a metal awning between container structures. The workshop building has been designed by SJL Consulting Engineers (see structural engineering drawings dated 12 April 2024). The dimensions of the workshop building will be approximately 18m wide x 12m long x 4.5m high). In total the new shed will have a floor area of approximately 216m². The proposed new building work comprises single storey construction with materials generally of steel and sheet metal and concrete pier footings. The floor surface underneath the awning structure will be finished to a compacted gravel surface. As a Class 8B building that has a proposed total floor



area of less than 500m², the building must meet the building setback and structural adequacy requirements of the BCA. The specific design detail of the proposed building is intended to be assessed at Construction Certificate stage. In general, it is assessed the proposed new workshop building can comply with the BCA and has no fire separation implications for adjoining buildings.

- **Crib Room** - is proposed to be purchased from a manufacturer of transportable buildings (Redipodhouse) and located on the site. As a Class 5 office / amenities building, the building must meet the building setback, fire safety, access and structural adequacy requirements of the BCA. The crib room is to be serviced by an adjoining car parking and septic system. A ramped access will join the office to a concrete surface disabled car parking space. The specific design detail of the proposed crib room is intended to be assessed at Construction Certificate stage. In general, it is assessed the proposed new crib room can comply with the BCA and has no fire separation implications for adjoining buildings.

6.2.4. Management and Mitigation

A Construction Certificate is proposed to be obtained prior to any new building work, which provides further opportunity to ensure all aspects of the design meets the requirements of the BCA. Roof water from new buildings will be connected in downpipes and directed to water storage tanks for firefighting purposes and use in plumbing. Any overflow from tanks would be diverted a minimum 3m from buildings and structures and in a manner that does not cause soil erosion or nuisance to ongoing grain handling facility operations.

6.3. Onsite Wastewater Management System

6.3.1. Assessment of Existing Conditions

The proposal sits within a context of the existing Manildra Group Grain Handling Facility at Tabbita. The total area of the site is approximately 14.85ha. There is adequate land area available to install and operate a septic system on the site.

6.3.2. Assessment of Potential Impact

A new septic system is proposed to be installed to service the crib room building. The specific design detail of the septic system is intended to be assessed once development consent is granted for the proposed alterations and additions. In general, it is assessed the proposed new onsite sewage management system can comply with the NSW Guidelines for Onsite Sewage Management for Single Households.

6.2.4. Management and Mitigation

An application under Section 68 of the LG Act 1993 is intended to be lodged at the same time as the lodgement of a Construction Certificate for the proposed crib room building.

6.4. Access and Traffic

6.4.1. Assessment of Existing Conditions

Riverina Grain operated a grain handling facility at the site for a number of years. Tysons Road has provided the main haulage route for grain deliveries and dispatch. No traffic accidents are recorded on Tysons Road on the TfNSW crash history map, with the nearest recorded accident being a serious injury accident at the corner of Kidman Way and Tabbita Lane, approximately 1km west of the site.

Since purchasing the grain handling facility from Riverina Grain, the Manildra Group has operated the facility (as existing) during the 2023-24 harvest season. The Manildra Group kept a record of all truck deliveries over the 2023-24 harvest with a total of 2,039 trucks being received over the peak harvest period, including Road Trains, AB-triples, B-doubles and semitrailers.

Analysis of truck receipts data recorded by the Manildra Group shows the average grain delivery by truck was approximately 46 tonnes of grain per truck, with a total of 94,000 tonnes of grain being received at the Tabbita facility.

6.4.2. Assessment of Potential Impact

The proposal involves alterations and additions to an existing grain handling facility on a rural allotment east of Tabbita.

Similar to other grain handling facilities in the region, the Manildra Group Grain Handling Facility at Tabbita is operated on a seasonal basis, whereby the majority of activity is conducted for several weeks during harvest primarily involving truck receipt and unloading operations, followed by limited activity for several months other than product storage, loading onto trucks for transport and general maintenance of the site. Road access to the site continues via internal access roads connecting to Tysons Road, which is a bitumen sealed local road, east of the Kidman Way.



Receivals by road occur primarily during the grain harvest season, which generally spans a 10-week period between October and January each year. Through this period, grain receivals can occur over a period of up to 16 hours per day. Most trucks accessing the facility have large carrying capacities, such as semi-trailers, B-doubles and Road Trains.

Dispatch of grain continues via B-doubles, which is the most efficient method of haulage to flour mills owned and operated by the Manildra Group.

The Manildra Group propose to operate their upgraded facility within the storage limit of 150,000 tonnes per annum.

A Traffic Impact Assessment (TIA) has been prepared by Currajong that analyses existing road and rail conditions as well as provides an assessment of the implications of the proposal, based on actual / forecasted truck trip generation from the Manildra Group Grain Handling Facility.

Based on the existing and proposed new bunker storages, the TIA forecasts a total of 150,000 tonnes of grain storage per year. The TIA assumes a range of trucks entering and leaving the Tabbita Grain Handling Facility via Tysons Road, including Road Trains, AB-triples, B-doubles and semitrailers. Manildra Group delivery of grain is based on B-doubles. The traffic estimates are as follows:

- **Construction Phase** - Construction activities associated with the installation of proposed new bunkers and enlargement of the onsite detention pond have also been calculated in the TIA over an estimated 20-week duration, that would be programmed to occur outside of peak harvest periods. Traffic generation from the proposed construction phase will include the following:
 - Trucks carting gravel supplies for hardstand and roadworks, estimated @ 525 trips (in and out) over 20 weeks.
 - Concrete trucks, estimated @ 30 trips (in and out) over 20 weeks.
 - Semi-trailers carrying transportable buildings and building materials, estimated at 30 trips (in and out) over 20 weeks.
 - Light vehicle movements, estimated @ 500 trips (in and out) over 20 weeks.

It is likely that there will be less traffic generated from the construction phase, with some vehicles remaining on the site during the entire construction period.

- **Operations Phase** - Traffic generation from the operation of the Tabbita Grain Handling Facility during the peak harvest period would generate approximately 6,976 (in and out) trips, based on average truck load of 43+ tonnes to fill the facility to its maximum capacity of 150,000 tonnes.
- **Dispatch Operations** - Dispatch would generate approximately 6,976 (in and out) trips, based on average truck load of 43+ tonnes to exhaust the grain stored at the facility, based on its maximum capacity of 150,000 tonnes. Dispatch operations would generally be undertaken throughout the year, generally outside peak harvest.

The Currajong TIA provides an assessment of traffic impacts, including an assessment of the existing intersection of The Kidman Way and Tysons Road as well as an assessment of the existing Temora Roto Railway level crossing. Overall, traffic and transport impacts are assessed to be manageable, based on existing local road conditions and traffic generation along Tysons Road and Kidman Way. Upgrades to drainage infrastructure along Tysons Road and a new entry / exit arrangement are proposed to reduce impacts on the local road network. No significant impacts are assessed at the level crossing of the Temora Roto Railway, based on existing rail conditions.

6.4.3. Management and Mitigation

No additional mitigation measures are proposed, other than upgrades to drainage infrastructure along Tysons Road and a new entry / exit arrangement to reduce impacts on the local road, and adherence to Australian Road Rules and load limits.

6.5. Biodiversity

6.5.1. Assessment of Existing Conditions

The existing grain handling facility sits within a context of a rural land-use east of Tabbita. The site of the grain handling facility is devoid of native vegetation, other than roadside vegetation. Table 3 provides wider environmental context.

Table 3 – Tabbita Environmental Context Evaluation

Attributes	Description
LGA	Carrathool
Zoning	RU1 Primary Production Zone
Catchment	Murrumbidgee
IBRA Bioregion	NSW South Western Slopes
IBRA Subregion	Murrumbidgee
Mitchell Landscape	Swamp floor with lignum (<i>Muehlenbeckia cunninghamii</i>) and cane grass (<i>Eragrostis australasica</i>), margins with black box (<i>Eucalyptus largiflorens</i>) and river cooba (<i>Acacia stenophylla</i>), channels lined with river red gum (<i>Eucalyptus camaldulensis</i>). Lunettes with black box and white cypress pine (<i>Callitris glaucophylla</i>)
Nearest Waterway	Barren Box Swamp / Mirrool Creek (2.5km south-west of the site)
Nearest NPWS Park	Cocoparra National Park (33km east of the site)
Connectivity	Minimal connectivity along the Tysons Road Reserve
Soils	Heavy self-mulching and cracking grey or brown clay, loamy sand lunette with red-brown gradational profile
Biodiversity Values Map	State Forest, stands of native vegetation on farms mapped as environmental sensitive lands

6.5.2. Assessment of Potential Impact

The proposed development involves limited clearing of native vegetation (approximately 200m²) within the Tysons Road reservation to create a new exit from the facility. Any loss of flora species is restricted to a small area directly at the access location. The remnant woodland along Tysons Road is fragmented by accesses and road infrastructure. A site assessment was carried out by desktop searches and review of ecological databases and site inspection to identify threatened species, populations or ecological communities listed in the BC Act 2016, Fisheries Management Act 1994 and EPBC Act 1999 that have the potential to occur in the study area.

Tests of Significance were completed for threatened species and ecological communities, as per the criteria under the EPBC Act 1999. The results of the significant impact criteria assessments for threatened species and ecological communities identified no significant impacts. A significance assessment under Section 1.7 of the EP&A Act 1979 which takes into consideration Part 7 of the BC Act 2016 was also undertaken to determine whether the proposal is likely to significantly affect threatened species and / triggers the Biodiversity Offsets Scheme (BOS) is provided in Table 4 – BC Significance Assessment:

Table 4 – BC Significance Assessment

Test	Assessment
(a) it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or	The site is located towards the eastern area the Carrathool Shire in the Murrumbidgee River catchment. The area immediately in and around the site is generally devoid of native vegetation, except for pockets of box eucalypts adjoining the site along road corridors assessed to meet the definition of native vegetation, as it provides a native overstorey, mid-storey, and shrub-storey and a grassy ground-layer. Clearing of a 20m section of native vegetation within the road reserve, with a total area of 200m ² . No threatened species were observed during site inspection.
(b) the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets	The proposal involves no clearing of native vegetation on the site. Native vegetation is found along Tysons Road, and it would be necessary to clear vegetation to create a new exit from the facility. The extent of native vegetation



Test	Assessment
scheme applies to the impacts of the development on biodiversity values, or	clearing within the road reserve would total approximately 200m ² , below the NSW Biodiversity Offset Threshold. No significant impacts on threatened species or ecological communities are assessed to apply. Contribution to the Biodiversity Offset Scheme (BOS) is not required.
(c) it is carried out in a declared area of outstanding biodiversity value	The site is not a declared area of outstanding biodiversity value.

The potential impacts on the condition, ecological value and significance of the fauna and flora on the land are considered to be low and will not change as a result of the proposed additions to the existing grain handling facility.

6.5.3. Management and Mitigation

Table 5 details specific mitigation measures to reduce impacts on roadside vegetation and biodiversity.

Table 5 – Proposed Flora and Fauna Mitigation Measures

Impact	Mitigation Measure
General	<p>Ensure construction workers are provided with an environmental induction prior to the commencement of works to outline key biodiversity features of the site and the management measures in place to protect biodiversity during construction.</p> <p>Vehicles and machinery required for works are not to extend beyond the work area.</p> <p>Site is to be kept tidy and free from rubbish at all times, to prevent wastes being blown into adjacent areas of native vegetation or waterways.</p> <p>Any required revegetation activities will be undertaken using native species sourced from local seed wherever possible. Vegetation cover should be returned to the site within a reasonably practicable timeframe post-clearing to reduce soil exposure and loss.</p>
Natural flow regime	Appropriate measures to ensure natural water flow is maintained should be in place for the duration of the bridge repair works.
Native vegetation loss	Clearly delineate vegetation to be removed / retained (native vegetation and hollow bearing / mature trees to be retained) and induct all site personnel as to the approved extent of excavation / clearing permitted by Council.
Loss of fauna habitat and habitat resources	Ensure all work crew understand the importance of habitat features onsite including hollow bearing trees, fallen timber and logs. Avoid impact to all habitat within the subject site wherever possible.
Fauna injury and mortality	Ensure an appropriately qualified ecologist is contacted to remove and relocate wildlife as necessary, and to attend to any wildlife that are injured as a result of works.
Invasion and spread of weeds and pests	<p>Develop and implement an active weed and pest management plan prior to construction commencing, to reduce the risk of weed spread and safety issues arising from pest and weed presence (e.g. WoNS and NSW Priority Weeds).</p> <p>Declared weeds within the subject site must be managed according to requirements under the Biosecurity Act 2015. It is recommended that all Weeds of National Significance and NSW Priority Weeds should be controlled, and where possible, eradicated to reduce the risk of further spread.</p> <p>Strict hygiene protocols must be followed. If weeds are accidentally transported to site, or identified during construction activities, all weed material should be immediately contained and removed from site.</p>



Impact	Mitigation Measure
Sedimentation, erosion and contamination	All soils and excavated material to be stockpiled at designated stockpile locations away from waterways, drainage lines and native vegetation in a cleared area, within pre-approved zones. Ensure these are appropriately stabilized in accordance with the 'Blue Book' (Landcom 2004).

6.6. Soils and Water Quality

6.6.1. Assessment of Existing Conditions

The site is not affected by the "Flood Planning" layer identified by Council or under the NSW Planning Portal. The likelihood of a flood inundating the site is low. The site is located on land identified as groundwater vulnerable identified by Council. Overland stormwater flow is controlled via a stormwater detention pond with overflow directed to the south onto Tysons Road.

6.6.2. Assessment of Potential Impact

The proposal involves the construction of additional bunkers and enlargement of the existing onsite detention pond. Surface water runoff from the development site will be well-contained and managed with soil erosion and sediment controls. The entire grain handling facility is managed via a detention pond and drainage swales. It is not proposed to excavate to groundwater level, which is estimated at depth. On this basis, a surface water and ground water impact assessment has been prepared for the proposal.

The site is not affected by the "Flood Planning" layer identified by Council or under the NSW Planning Portal and the likelihood of flood waters inundating the development site is low. The site is located on land identified as groundwater vulnerable. The land is not identified as containing any watercourses or wetlands under the CLEP 2012 mapping. No groundwater extraction is proposed.

TCS has prepared engineering plans of proposed alterations and additions to the existing Manildra Group Grain Handling Facility at Tabitta. A stormwater management plan and report has also been prepared, dated 29 May 2024. Key features of the TCS engineering drawings and stormwater management plan are as follows:

- The earthworks and stormwater control measures proposed by TCS are considered to be appropriate in the circumstances and based on robust civil engineering and stormwater management calculations.
- Road drainage improvements are proposed with the provision of additional culverts on Tysons Road, subject to approval of such works by Carrathool Shire Council under a Section 138 Permit.
- All imported road base and other fill materials brought onto the site will be sourced from a local supplier and certified as clean material (VENM).
- No impacts on natural watercourses, drinking water catchments or environmentally sensitive areas are assessed to apply.
- Appropriate searches of the AHIMS database have not identified any recorded items within a 50m buffer of the subject land.

By implementing the TCS engineering drawings it is assessed drainage impacts would be reduced to acceptable levels in and around the Manildra Group Grain Handling Facility.

It is noted the proposal would involve the closure of an existing pipe draining stormwater from the adjoining Lot 2 DP 1220512 into the Manildra Group storage pond. Review of the Land Title details relating to Lots 2 and 3 DP 1220512 does not reveal any legal requirement for the Manildra Group to accept stormwater from Lot 2 DP 1220512. It is suggested, stormwater from Lot 2 would need to be directed to the nearest legal point of discharge, being Tysons Road. The matter has been raised with Carrathool Shire Council planning staff via email on 22 January 2024 and a follow-up telephone meeting on 23 February 2024, with advice to lodge the DA accordingly.

6.6.3. Management and Mitigation

The proposed management measures to reduce impacts on water resources are as follows:

- Enlargement of the existing 10ML detention pond to provide 19ML stormwater retention capacity.
- Upgrading of culverts adjacent to the site entrance and exit under Tysons Road.



- Stormwater from the proposed development will be directed to the new detention pond via internal drainage channels constructed with silt traps. Such silt traps shall be cleared at regular intervals.
- No groundwater will be taken.
- All reasonable and practicable measures will be implemented to control flow velocities in such a manner than prevents soil erosion along drainage paths and at the entrance and exit.

6.7. Air Quality

6.7.1. Assessment of Existing Conditions

The existing grain handling facility is well separated from nearby sensitive receivers and is unlikely to result in air quality impacts over and above that otherwise associated with the exiting rural activities in the locality. The nearest residence to the site is located approximately 300m to the south-west, in between Kidman Way and the Temora Roto Railway line. On this basis, an air quality impact assessment has been prepared for the proposal.

6.7.2. Assessment of Potential Impact

The POEO Act 1997 sets the statutory framework for managing air quality in NSW, including establishing the licensing scheme for major industrial premises and a range of air pollution offences and penalties. The POEO (Clean Air) Regulation 2022 sets standards of concentration for emissions to air from both scheduled and non-scheduled activities. For the proposal activities, the POEO (Clean Air) Regulation provides general standards of concentration for scheduled premises which are Solid particles (total) – Any activity or plan (except listed below) – 100mg m³.

Further to the requirements above, Part 4 Clause 20 of the POEO (Clean Air) Regulation 2022 requires that motor vehicles do not emit excessive air impurities which may be visible for a period of more than 10-seconds when determined in accordance with the relevant standard.

The assessment of air quality impacts identifies potential for emissions to air from the following sources:

- Construction of bunkers, detention pond, internal roads and new pads for buildings.
- Truck haulage, loading and unloading operations.
- Emissions from vehicle and generator exhaust.

The specific pollutants of interest associated with those activities are:

- Total suspended particulate (TSP).
- Particulate matter with an aerodynamic diameter of 10 microns (PM10).
- Particulate matter with an aerodynamic diameter of 2.5 microns (PM2.5).

Emissions of particulate matter associated with construction phase and operational phase activities are unlikely to have a significant impact on air quality due to the separation from nearby sensitive receivers, the limited scale of construction works and implementation of management measures.

Emissions of noxious carbon monoxide (CO) and sulphur dioxide (SO₂) related to diesel combustion would be also unlikely to have a significant impact on air quality (in addition to particulates considered above) given the distances between the proposal and nearest sensitive receptors and the quantity of equipment operating on site.

6.7.3. Management and Mitigation

Procedures would be developed for the proposed development linking visible dust generation from all activities with wind conditions experienced at the site. A range of actions would be listed which would be adopted to reduce visible dust generation, until such time as the adopted trigger levels have reduced. The proposed emissions controls to be employed at the site are as follows:

- Application of water on internal haulage roads or the use of dust suppression additives for dust control (if required).
- Covering loads with a tarpaulin.
- Limit dispatch load sizes to ensure material is not above the level of truck sidewalls.
- Minimising travel speeds and distances.



6.8. Noise and Vibration

6.8.1. Assessment of Existing Conditions

The site sits within a context of rural land-use. There are no dwellings or other sensitive land-uses in close proximity to the existing grain handling facility. The proposal involves alterations and additions to enlarge the existing detention pond, install new bunkers, new internal roads and access. The proposal will continue to receive and dispatch grain by truck to and from the site. It is assumed all noise sources will be contained within the existing site footprint area excepting noise from haulage vehicles accessing the site via the public road network.

6.8.2. Assessment of Potential Impact

The proposal involves the construction of new silos, and the temporary storage of grain for unloading into rail trucks at an existing grain handling facility. The proposed grain silos are to be well separated from the nearest sensitive receivers and are unlikely to result in noise or vibration impacts. The nearest residence to the site is located approximately 300m to the south-west, in between Kidman Way and the Temora Roto Railway line. On this basis, a noise impact assessment has been prepared for the proposal.

The POEO Act 1997 sets the statutory framework for managing noise and vibration in NSW. The primary tools used to determine compliance with the POEO Act 1997 in relation to noise and vibration are as follows:

Noise Policy for Industry

The EPA released the Noise Policy for Industry (NPI) in October 2017 which provides a process for establishing noise criteria for consents and licenses enabling the EPA to regulate noise emissions from scheduled premises under the POEO Act 1997. The objectives of the NPI are to:

- Provide noise criteria that is used to assess the change in both short term and long-term noise levels.
- Provide a clear and consistent framework for assessing environmental noise impacts from industrial premises and industrial development proposals.
- Promote the use of best-practice noise mitigation measures that are feasible and reasonable where potential impacts have been identified.
- Support a process to guide the determination of achievable noise limits for planning approvals and/or licences, considering the matters that must be considered under the relevant legislation (such as the economic and social benefits and impacts of industrial development).

The policy sets out a process for industrial noise management involving the following key steps:

- Determine the Project Noise Trigger Levels (PNTLs) (i.e. criteria) for a development. These are the levels (criteria), above which noise management measures are required to be considered. They are derived by considering two factors: shorter-term intrusiveness due to changes in the noise environment; and maintaining the noise amenity of an area.
- Predict or measure the noise levels produced by the development with regard to the presence of annoying noise characteristics and meteorological effects such as temperature inversions and wind.
- Compare the predicted or measured noise level with the PNTL, assessing impacts and the need for noise mitigation and management measures.
- Consider residual noise impacts - that is, where noise levels exceed the PNTLs after the application of feasible and reasonable noise mitigation measures. This may involve balancing economic, social and environmental costs and benefits from the proposed development against the noise impacts, including consultation with the affected community where impacts are expected to be significant.
- Set statutory compliance levels that reflect the best achievable and agreed noise limits for the development.
- Monitor and report environmental noise levels from the development.

The policy sets out the procedure to determine the PNTLs relevant to an extractive industry development. The PNTL is the lower (i.e. the more stringent) of the Project Intrusiveness Noise Level (PINL) and Project Amenity Noise Level (PANL) determined in accordance with Section 2.3 and Section 2.4 of the NPI.

The PINL (LAeq(15min)) is the RBL + 5dB and seeks to limit the degree of change a new noise source introduces to an existing environment. Hence, when assessing intrusiveness, background noise levels need to be measured / predicted. For



low noise environments, minimum assumed RBLs can be adopted in lieu of completing background noise measurements. This is considered the most conservative method for establishing noise criteria for a project. These result in minimum intrusiveness noise levels as follows:

- Minimum Day RBL = 35dBA.
- Minimum Evening RBL = 30dBA.
- Minimum Night RBL = 30dBA.

Due to the rural nature of the locality, the PINLs for the site are assumed to be based on the minimum RBL+5dBA. The noise management levels to be adopted at the Tabitta Grain Handling Facility by the Manildra Group are:

- 45dB LAeq(15min) (RBL +10dB) for construction activities for all residential receivers.
- 40dB LAeq(15min) for day period operations.
- 35dB LAeq(15min) for the morning shoulder and evening period.

The Manildra Group grain handling facility is unlikely to ever exceed noise criteria, due to the separation from nearby sensitive receptors.

Road Noise Policy

Road traffic noise assessment criteria is provided in the Department of Environment, Climate Change and Water NSW (DECCW), Road Noise Policy (RNP), 2011. The policy sets out noise criteria that provide for a degree of amenity appropriate for the land use and road category. Noise emissions associated with haulage of material on local roads are unlikely to have a significant noise impact due to the separation from nearby sensitive receptors and roads.

ANZECC Blasting Guidelines

Noise and vibration levels from blasting are established in the Australian and New Zealand Environment Conservation Council (ANZECC) – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration. The blasting limits are generally consistent with the guideline levels contained within AS2187:2006 Part 2 – Explosives - Storage and Usage – Part 2. Where compliance is achieved, the risk of human annoyance is minimised. The proposal does not propose any blasting and therefore no impacts on adjoining land-uses are assessed as per the ANZECC blasting guidelines.

6.8.3. Management and Mitigation

- Application of a 45dB LAeq(15min) (RBL +10dB) for construction activities, as measured at nearby residential receivers.
- Application of a 40dB LAeq(15min) for daylight hours.
- Enclose fixed engines, pumps and compressors where practicable for onsite machinery.
- Maintain silos and equipment in accordance with the original equipment manufacturer's specifications.
- Shut down equipment when not in use.
- Control vehicle speed on internal access roads.
- Avoid unnecessary operation of plant or revving of mobile or stationary motors and engines.
- Mobile plant and equipment operated at the site should be selected and maintained to minimise noise emissions.
- All internal roads for road haulage and off-road trucks shall be constructed and maintained to avoid excessive noise associated with uneven surfaces and potholes.



6.9. Heritage

6.9.1. Assessment of Existing Conditions

There are no Aboriginal heritage sites recorded in close proximity to the Manildra Group Tabitta Grain Handling Facility. The site is not listed as a local heritage item listed under the CLEP 2012 or State Heritage Register. The proposal involves alterations and additions to the existing grain handling facility on land that has been used for rural and agricultural produce activities for many years. A search of the Aboriginal Heritage Information System (AHIMS) has been completed for the subject land. The site is not listed as heritage items under the Carrathool LEP 2012 or State Heritage Register. Assessment of the potential impacts associated with cultural and built heritage have been considered in this section.

6.9.2. Assessment of Potential Impact

Whilst a search of the AHIMS has not identified the presence of any recorded sites or places, there is a need to consider whether the proposal will impact on potential items of Aboriginal cultural heritage significance. Based on the framework in the Due Diligence Code of Practice (DDCP) for the Protection of Aboriginal Objects in NSW, the following assessment statements are true:

- The proposal does not represent an activity that is a declared project under Part 3A of the EP&A Act 1979.
- The proposal is not an activity that is an exempt activity listed in the NPW Act 1974 or other legislation.
- The proposal will not involve harm to an Aboriginal object that is trivial or negligible under Section 86 of the NPW Act 1974.
- The proposal is not on land that is known to be in an Aboriginal Place declared by the Minister under s.84 of the NPW Act 1974.
- The proposal is not a low impact activity for which there is a defence in the NPW Regulation 2019.

Having regard to the above, the correct procedure is to follow the generic due diligence process as per Section 8 of the DDCP. An assessment of the due diligence process is included in Table 6.

Table 6 – The Generic Due Diligence Process

Step	Question	Response
1	Will the activity disturb the ground surface or any culturally modified trees?	Yes. Proceed to Step 2.
2	Are there any: a) relevant confirmed site records or other associated landscape feature information on AHIMS? and/or b) any other sources of information of which a person is already aware? and/or c) landscape features that are likely to indicate presence of Aboriginal objects?	No. According to the DDCP, an AHIP application not necessary and it is possible to proceed with caution. If any Aboriginal objects are found, stop work and notify DECCW. If human remains are found, stop work, secure the site and notify the NSW Police and DECCW. Consideration of Steps 3, 4 and 5 (below) not necessary.
3	Can harm to Aboriginal objects listed on AHIMS or identified by other sources of information and/or can the carrying out of the activity at the relevant landscape features be avoided?	N/A
4	Does a desktop assessment and visual inspection confirm that there are Aboriginal objects or that they are likely?	N/A



5.	Further investigation and impact assessment	N/A
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6.9.3. Management and Mitigation

No specific mitigation strategies are proposed, other than general awareness of the legislative protection of Aboriginal objects under the NPW Act 1974 in the unlikely event that artefacts are discovered.

6.10. Public Safety and Hazards

6.10.1. Assessment of Existing Conditions

The site is confined within existing stock proof fencing that prevents unauthorised access to certain facilities at the existing Manildra Group site. The proposal will utilise standard operational measures that are typical to the industry and the following site-specific hazards identified at the site, as follows:

- The handling, storage and disposal of waste materials.
- Potential for fire and stormwater flooding.
- Potential for unauthorised access to the site.

6.10.2. Assessment of Potential Impact

The land is not identified as flood prone or bushfire hazard. Surrounding land is used for rural and infrastructure purposes, with no sensitive receivers within close proximity of the site.

In relation to public safety risks associated with unauthorised access to the site, the site is fenced, gates would be locked when not in use and appropriate signage alerting the public to the site office would be placed at the site entrance. The site is not in close proximity to nearby housing residential areas or towns. As a result, public safety risks associated with unauthorised access to the site are considered negligible.

Waste generated by the proposal is likely to be low and can be managed appropriately and assuming adherence to industry standard waste management measures. Based on the adoption of these mitigation measures the site can minimise waste management impacts to an acceptable level.

In relation to risks associated with hydrocarbons, based on the proposed management and mitigation measures, the risk of hydrocarbon contamination of land is considered to be negligible.

6.10.3. Management and Mitigation

The proposal will implement the following risk management measures to minimise the potential for worker and public safety, waste and hazard related impacts:

Fire Hazard

Manildra Group has emergency management and evacuation procedures in place that deal with fires. The proposal would:

- Ensure that the site remains fenced, and the entrance is locked when the site is not occupied.
- Store any hydrocarbons and hazardous materials undercover in accordance with the relevant Australian Standard, including AS1940 – The Storage and Handling of Flammable and Combustible Liquids.
- Ensure that all plant is fitted with appropriate fire suppression equipment.
- In the event that the site is threatened by a bushfire, personnel would be evacuated to the nearest safe place.

Unauthorised Access

The Manildra Group Grain Handling Facility includes fences, gates and signage preventing unauthorised access where required.

Waste

The proposal would ensure the following:

- Appropriate waste receptacles must be provided for the segregation and storage for waste.



- All wastes will be segregated onsite and disposed of with specific licensed waste services providers.
- Bins and storage areas to be maintained so they are free of vermin (mice, rats, cockroaches, flies).
- Littering not permitted. All worksites must be free of litter, including cigarette butts.
- No waste is to be burnt on site.
- Hydrocarbons and hazardous materials to be handled in accordance with the relevant Australian Standard, including AS1940 – The Storage and Handling of Flammable and Combustible Liquids.
- All waste streams are to be removed off site by a licensed waste contractor to a lawful point of disposal.

6.11. Social and Economic Impacts

6.11.1. Assessment of Existing Conditions

The site and surrounding land are zoned RU1 Primary Production. The proposed grain silos are to be located on an existing rural allotment that has been used for the storage of grain and agricultural produce for many years. The land surrounding the proposed development will continue to be used for rural and infrastructure purposes.

6.11.2. Assessment of Potential Impact

An assessment of potential impacts of the proposed development has been undertaken with regards to scoping methodology outlined in the Social Impact Assessment Guideline 2017 (SIA Guideline), published by the Department of Planning and Environment. The proposed development will make a neutral social impact. The proposal would be unlikely have any unacceptable impacts on residents or the environment within or surrounding the site. As a result, adverse socio-economic impacts are assessed to be negligible.

6.11.3. Management and Mitigation

Management and mitigation measures for each of the elements comprising a potential social impact (e.g. noise, traffic, visual amenity and air quality) have been addressed in their relevant sections of this report. The proposal would implement the following management and mitigation measures to ensure that the proposal-related benefits for the community surrounding the site are maximised and adverse impacts are minimised:

- Maintain a complaints telephone line and ensure that the existence of the number is advertised at the site entrance.
- Give preference to local building and produce suppliers within the locality where practical.



7. EVALUATION AND JUSTIFICATION FOR THE PROPOSAL

7.1. Introduction

This section presents the evaluation and justification of the proposal in light of the objects of the EP&A Act 1979. It also assesses the proposal against the principles of Ecologically Sustainable Development (ESD) and other key policy guidelines in order to provide further guidance as to the acceptability of the proposal, as presented in the SEE. An assessment of the consequences of not proceeding with the proposal and site suitability is also undertaken in this section.

7.2. Objectives of the EP&A Act 1979

Development Consent is being sought under Section 4.16 of the EP&A Act 1979 and must therefore satisfy the objectives of the Act. The objectives of the Act are listed below:

- a. To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources.
- b. To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment.
- c. To promote the orderly and economic use and development of land.
- d. To promote the delivery and maintenance of affordable housing.
- e. To protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats.
- f. To promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),
- g. To promote good design and amenity of the built environment.
- h. To promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants.
- i. To promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State.
- j. To provide increased opportunity for community participation in environmental planning and assessment.

The proposal is considered to be consistent with the above objectives. An objective of the EP&A Act 1979 is for the encouragement of ecologically sustainable development (ESD), which is assessed in the next section.

7.3. Ecological Sustainable Development

ESD is a long-standing and internationally recognised concept. The concept has been affirmed by the 2002 World Summit for Sustainable Development and has been included in multiple pieces of Federal and State legislation. Australia's National Strategy for Ecologically Sustainable Development (1992) defines ecologically sustainable development as:

Development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends.

The proposal has endeavoured to address long established ESD principles, as follows:

- **The precautionary principle** - No serious environmental threats have been identified. No delays to the final design investigations or assessment process are recommended to allow for additional information / studies / surveys to take place under different climatic or seasonal conditions.
- **Inter-generational (social) equity** - Social equity provides a notion of preservation of environmental aspects that cannot be replaced for the enjoyment of future generations. Generally, such aspects relate to biodiversity, cultural heritage, land-use and the transformation of the locality as a result of the development. The proposal has considered such aspects and the SEE assessment concludes that environmental impacts will be minimal.
- **Conservation of biological and ecological integrity** - Given the highly disturbed / modified nature of the site, no significant flora or fauna issues have been identified. The limited clearing of native vegetation for a new site exit would be undertaken under controlled conditions in accordance with LG Act 1993 and below the threshold triggers for a BDAR as per the BC Act 2016.

- **Improved valuation, pricing and incentive mechanisms** - The small volumes of waste generated from the proposal will be appropriately managed to minimise impacts on common public areas, the appropriate pricing mechanism are used to reflect the user pays approach to environmental management.

An environmentally sustainable design framework has been incorporated into the Manildra Group Tabbita Grain Handling Facility to:

- Identify waste materials collection, processing and re-use in civil construction materials.
- Reduce the ongoing costs associated with operations.
- Siting silos with existing silos and rail loading facilities.
- Provide a healthy / safe working environment throughout the site.

7.4. Safety, Security and Crime Prevention

The design of the development is acceptable having regard to the location of the land and the characteristics of the existing natural and built features of the surrounding environment. The development, as designed, is generally consistent with the principles of Crime Prevention Through Environmental Design. The design of the premises has focused on the safety and well-being of all users, including staff and contractors. The design maintains good safety standards. Adequate site security will be maintained and clear sightlines around entry / exits to ensure safety of all systems and operations dealing with grain storage and loading operations.

7.5. Cumulative Impacts

The potential environmental impacts of the proposal have been detailed in the relevant sections of the SEE. Overall, the proposal makes a neutral / positive contribution to the environment. The proposal is considered compatible with the site and its surrounds and does not contribute to having a significant cumulative impact. The potential environmental impacts of the proposal have been detailed in the relevant sections of the SEE. The proposal will not result in a net impact to biodiversity, water quality, air pollution, noise, safety, loss of views, traffic or parking. Overall, the proposal makes a neutral contribution to the environment. The proposal is considered compatible with the site and its surrounds and does not contribute to having a significant cumulative impact.

7.6. Suitability of the Site for the Development

The suitability of the site for the proposed development has been examined in detail. The site layout and building design is appropriate having regard to identified constraints posed by the built and natural environments. The suitability of the site has been proven with appropriate design, development and operation of a grain handling facility at the site for many years. The site has the capacity to support the proposed development without creating adverse impacts on the site or adjoining land. The proposed alterations and additions are considered suitable on the site.

7.7. Public Interest

Due to the nature and scale of the proposed development, no significant public interest matters have been identified. The proposed bunkers, detention pond expansion, new buildings and new roads and accesses will be of a nature and scale that fits the existing operations and surrounding rural context. The proposed alterations and additions to an existing grain handling facility are permitted on land zoned RU1 Primary Production. There are no specific policy statements from either Federal or State Government that are relevant to the proposal, nor any planning studies or strategies that need to be taken into account. There are no covenants, easements or agreements that affect the proposal in the long term. The proposal is assessed to pose no significant detrimental impacts on the public interest.

8. CONCLUSION

This Statement of Environmental Effects has been prepared by Currajong on behalf of the Manildra Group to support a Development Application for alterations and additions to an existing agricultural produce industry at Tabbita. The proposed works comprise the following:

Stage 1 Work:

- Slight reconfiguration of Bunkers B1 to B5 approximately 15m to north to make way for an expansion of the existing detention pond.
- Enlargement of the existing 10ML detention pond to provide 19ML stormwater retention capacity.
- Construction of new internal roads to minimise traffic impacts on Tysons Road.
- Erection of a new workshop (container / awning structure) and staff amenities building (crib room) as well as the installation of new water storage tanks, car park and septic system.
- Upgrading of the existing driveway access onto Tysons Road located towards the eastern end of the site to function as the entry into the grain handling facility.
- Construction of a new driveway access onto Tysons Road towards the western end of the site to function as the exit from the grain handling facility. Roadside vegetation clearing of approximately 200m² of native vegetation would be required to accommodate the proposed new exit.
- Upgrading of culverts adjacent to the site entrance and exit under Tysons Road.
- Maintenance of the existing weighbridge, sample stand, toilets and septic system.
- Closure of the existing pipe draining stormwater from Lot 2 DP 1220512 into the Manildra Group site (Lot 2 DP 1220512) to allow implementation of the above.

Stage 2 Work:

- Installation of two new grain bunkers B6 and B7 towards the eastern portion of the site.
- Construction of new internal roads to integrate bunkers B6 and B7 with other facilities on the site.

The assessment of the proposed development has been documented in this Statement of Environmental Effects to visualise all aspects of the relevant matters for consideration under the Environmental Planning and Assessment Act 1979 and Environmental Planning and Assessment Regulation 2021. The assessment concludes the proposal is permissible in the RU1 Primary Production zone and consistent with relevant provisions of the Carrathool Local Environmental Plan 2012.

It is recommended that sufficient information has been submitted with the Development Application to allow the Carrathool Shire Council to make an informed decision on the proposal. It is the findings of this Statement of Environmental Effects that the proposed development should be supported.



CURRAJONG