



Proposed Extension to Existing Transport Depot, Lot 14 (No.1527) Great Northern Highway, Upper Swan

Mr Adrian Brajkovich



**Report and recommendations
of the Environmental Protection Authority**



**Environmental Protection Authority
Perth, Western Australia**

**Report 1398
May 2011**

Assessment on Proponent Information – Category B Environmental Impact Assessment Process Timelines

Date	Progress stages	Time (weeks)
13/1/11	Final referral information received	
4/2/11	EPA letter of intent and invitation to withdraw proposal	3
3/3/11	Proponent response to EPA letter of intent	4
28/3/11	Level of assessment set	4
9/5/11	Publication of EPA report	6
23/5/11	Close of appeals period	2

Timelines for an assessment may vary according to the complexity of the project and are usually agreed with the proponent soon after the level of assessment is determined.

In this case, the Environmental Protection Authority met its timeline objective in the completion of the assessment and provision of a report to the Minister.



Dr Paul Vogel
Chairman
4/5/11

ISSN 1836-0483 (Print)
ISSN 1836-0491 (Online)
Assessment No. 1875

Report 1398 - Proposed Extension to Existing Transport Depot, Lot 14 (No.1527)
Great Northern Highway, Upper Swan

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1. Introduction and background

This report provides the Environmental Protection Authority's (EPA's) advice and recommendations to the Minister for Environment on the proposal to extend the transport depot at Lot 14 Great Northern Highway, Upper Swan by Mr Adrian Bracjkovich.

Section 44 of the *Environmental Protection Act 1986* (EP Act) requires the EPA to report to the Minister for Environment on the outcome of its assessment of a proposal. The report must set out:

- The key environmental factors identified in the course of the assessment; and
- The EPA's recommendations as to whether or not the proposal may be implemented, and, if the EPA recommends that implementation be allowed, the conditions and procedures to which implementation should be subject.

The EPA may include in the report any other advice and recommendations as it sees fit.

The proponent has submitted a referral document setting out the details of the proposal, potential environmental impacts and proposed commitments to manage those impacts.

The EPA considers that the proposal, as described, cannot meet the EPA's environmental objectives for water quality in the Ellen Brook Nature Reserve.

The EPA has therefore determined under Section 40 of the EP Act that the level of assessment for the proposal is Assessment on Proponent Information (API) Category B (environmentally unacceptable), and this report provides the EPA advice and recommendations in accordance with Section 44 of the EP Act.

While the proponent currently operates a transport depot from this site, this operation has never been formally considered by the EPA and so the proposed extension has been considered on its own merits. The proponent operates a transport depot (shed and hardstand area) on the southern portion of Lot 14 (Figure 1). The shed was constructed without local government approval and the City of Swan granted retrospective approval for the existing operation in 2006, subject to conditions. This existing operation was never treated as a formal referral to the EPA under Part IV of the EP Act, as it was already constructed and in operation when brought to the attention of the Department of Environment and Conservation (DEC), and the Office of the EPA (OEPA).

Since retrospective approval was granted in 2006, the DEC (with some input from the OEPA) has endeavoured to have a drainage management plan implemented so that potential impacts of the existing operations are managed, to the extent possible under a retrospective approval. The potential impacts of main concern to the DEC and the OEPA were related to changes in hydrology and water quality of the site and adjacent Ellen Brook Nature Reserve, and the

effect that this would have on the conservation of the Western Swamp Tortoise, an endangered species.

In 2010, a Local Planning Scheme amendment was referred to the EPA for additional storage uses within the shed of the transport depot. The EPA did not assess this amendment but provided advice noting that hydrocarbons or other dangerous chemicals were not to be stored in the shed (Appendix 3).

When the EPA became aware of a proposal to extend the existing transport depot in August 2010, it requested that the City of Swan refer this proposal to the EPA under Part IV of the EP Act. After seeking additional information from the proponent and the DEC, the EPA informed the proponent that the likely level of assessment for the proposal was Assessment on Proponent Information (Category B — environmentally unacceptable) and invited the proponent to withdraw the proposal or provide additional information in support of the proposal. The proponent was not prepared to withdraw the proposal, so after consideration of all the information provided, the EPA set the level of assessment as Assessment on Proponent Information (Category B — environmentally unacceptable). This report is the outcome of the EPA's assessment.

2. The proposal

The proposal is to extend the transport depot at Lot 14 Great Northern Highway, Upper Swan. The extension involves the construction and use of a hardstand area for the parking of cars, trucks, trailers, and heavy machinery and the construction and use of a caretaker's residence. Figure 1 shows the layout of the proposed expansion and Figure 2 shows its location within the local area.

The main characteristics of the proposal are summarised in the table below.

Table 1: Summary of key proposal characteristics

Element	Description
Hardstand area	1.2 hectares — constructed of limestone and crushed rock <ul style="list-style-type: none">• staff parking (20 bays)• truck parking (20 bays)• trailer parking (20 bays)• demolition machinery parking (10 bays)
Caretaker's residence	Transportable residence with an Aerobic Treatment Unit for sewerage

The potential impacts of the proposal are discussed by the proponent in the referral documentation (Greg Rowe and Associates, 2010).

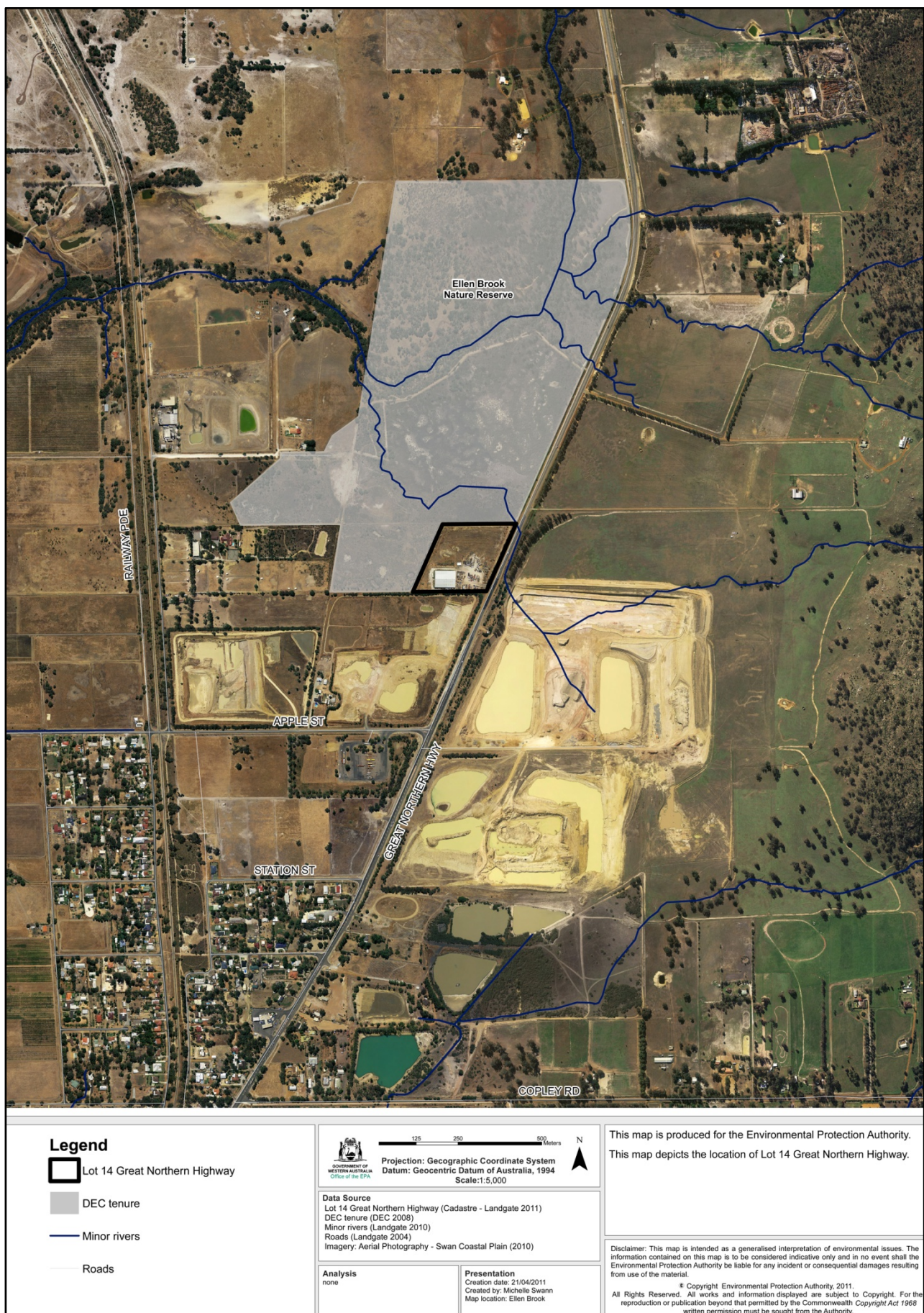


Figure 2: Regional location

3. Key environmental factors

The EPA considers that this proposal is adjacent to a particularly sensitive location and could not be reasonably modified to meet the EPA's objectives.

It is the EPA's opinion that the following key environmental factor is relevant to the proposal and requires evaluation in this report:

- (a) water quality — with regard to impacts on the Western Swamp Tortoise in the Ellen Brook Nature Reserve.

The key environmental factor is discussed in Section 3.1. The description of this factor shows why it is relevant to the proposal and how it will be affected by the proposal. The assessment of this factor is where the EPA decides whether or not a proposal meets the environmental objective set for the factor.

3.1 Water quality

Description

This proposal has the potential to affect water quality within the Ellen Brook Nature Reserve and thereby affect the conservation of the Western Swamp Tortoise (*Pseudemydura umbrina*), an endangered species.

The Western Swamp Tortoise is one of the most endangered tortoise or turtle in the world. The major threats to this species include predation from exotic predators, habitat loss and degradation (EPA, 2010). The species conservation status is recognised at international, national, and state levels through a range of high level protection listings and declarations for the species as detailed below:

- Critically Endangered (CR) in the 2007 IUCN (International Union for Conservation of Nature) *Red List of threatened species*. This indicates that the species is considered to be facing an extremely high risk of extinction in the wild.
- Listed in category 'critically endangered' in the list of threatened species — pursuant to section 178 of the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act); this indicates that the species is facing an extremely high risk of extinction in the wild in the immediate future.
- Schedule 1. Fauna that is 'rare or likely to become extinct' — pursuant to Section 14(2) (ba) of the Western Australian *Wildlife Conservation Act 1950*.
- Ranked as 'Critically Endangered' by the DEC Threatened Species Scientific Committee - endorsed by the Minister for Environment; the DEC uses the IUCN (2007) Red List Categories and Criteria to allocate 'rankings' to listed threatened taxa.

Given that the Western Swamp Tortoise inhabits shallow, ephemeral, winter- and spring-wet swamps and feeds on aquatic fauna such as insect larvae, small crustaceans and small tadpoles, any adverse change to water quality of its habitat would seriously affect this species.

Of the five sites where the Western Swamp Tortoise lives, the Ellen Brook Nature Reserve is the most important. The Ellen Brook Nature Reserve is the only self-sustaining, largely-natural Western Swamp Tortoise population. Water quality at this site is excellent and there is no evidence of pollution entering the swamps on the reserve (Burbidge et al. 2008), although some drainage lines into Ellen Brook Nature Reserve have not been monitored in the past. This reserve contains the biggest single population of Western Swamp Tortoises with an estimation of between 70 – 75 non-hatchling individuals.

The proposal would involve the storage of vehicles and heavy machinery on land that currently drains towards the Ellen Brook Nature Reserve. Such machinery would have the usual persistent low-level leakage of oils while standing on the site. In addition, from time to time accidental spills or major leaks of oils, fuel, or hydraulic fluids are to be expected from vehicles and machinery. These contaminants could then make their way into the Ellen Brook Nature Reserve via surface water flow or subsurface migration.

In its referral documentation, the proponent has put forward a drainage management plan which would create a hardstand area of limestone and crushed rock which would direct drainage into open unlined drains/swales and ultimately into the drainage system of the Great Northern Highway. Limestone and crushed rock is to be used, as asphalt is not suitable for tracked vehicles that will be stored on the site. This means that the hardstand and drains/swales would not be impermeable to the long-term movement of oils and any other contaminants spilled or leaked from vehicles.

Assessment

The EPA's environmental objective for this factor is to maintain water quality, in Ellen Brook Nature Reserve that supports the Western Swamp Tortoise.

While the drainage management plan prepared by the proponent for the transport depot extension may deal with short term rainfall events, it would not effectively manage the long term risk to the Western Swamp Tortoise. The drainage structures are designed to prevent surface water flowing directly into the Ellen Brook Nature Reserve. However, over the timescale of decades both the hardstand area itself and the drains/swales, would become contaminated with oils and hydraulic fluids as a result of leakage and accidental spills. With no impervious barrier between the site and the Ellen Brook Nature Reserve these contaminants would then migrate into the reserve.

In addition, there is also the possibility that spills or leakages could escape the drainage management system in a much shorter timeframe. This could occur if drainage structures were not properly maintained, not properly used, or simply overwhelmed by exceptionally heavy rainfall. For example, the EPA notes that the proponent has previously parked vehicles on areas not serviced by drainage management structures. If this were to occur for the proposed extension, then any spills or leakage could quickly enter the Ellen Brook Nature Reserve.

Once contamination had entered the Ellen Brook Nature Reserve it would be impracticable to remove it. Not only would contaminated soil and water need to be

removed from the reserve, but the source of the contamination (i.e. the hardstand area within the proposal area) would also need to be removed. This would destroy habitat of the Western Swamp Tortoise and close down the transport depot operations.

Therefore the EPA considers that in the long term it is almost certain that pollution from the transport depot (primarily hydrocarbons, from leakage and accidental spills) would enter the Ellen Brook Nature Reserve. Since pollution entering the reserve is very likely to have a major impact on Western Swamp Tortoises in the reserve, and the reserve is a critical core habitat of the Western Swamp Tortoise (containing the only self-sustaining, largely-natural tortoise population), pollution entering the reserve would have an unacceptable impact on the conservation of this critically endangered species.

Summary

In summary, the proposal presents an unacceptable long-term risk to Western Swamp Tortoise in the Ellen Brook Nature Reserve. Essentially, this is an incompatible land-use adjacent to a high value conservation area.

Having particular regard to the:

- long term risk to water quality in the Ellen Brook Nature Reserve; and
- importance of the Ellen Brook Nature Reserve to the conservation of the Western Swamp Tortoise,

it is the EPA's opinion that the proposal cannot meet the EPA's environmental objective for this factor.

4. Other Advice

The EPA has been advised that the existing transport depot (the hard stand, the sheds etc) on the site was built prior to the proponent obtaining the necessary planning approval and that planning approval was given retrospectively. Aerial photographs also appear to indicate that the proponent has commenced parking trucks in an area outside the area the subject of the retrospective planning approval. In view of the regulatory history of the site and the important environmental asset at risk if the current proposal were implemented, the EPA requests that relevant government agencies (State and local) monitor the site to prevent any unauthorised implementation of the proposal.

Under the *Environmental Protection Act 1986* (EP Act), it is an offence for any person to implement a proposal under assessment until that assessment is complete (section 41A(1) of the EP Act). Additionally, should the Minister for Environment decide or agree that this proposal may not be implemented (that is, adopts the EPA's recommendation) and notifies the proponent accordingly under section 45(8) of the Act, it is an offence for the proponent to do anything to implement the proposal (section 47(4) of the EP Act). Government agencies should monitor the site and report any suspected offences under the EP Act to the Chief Executive Officer under the EP Act (currently the Director General of the Department of Environment and Conservation).

5. Conclusions

The EPA has considered the proposal by Mr Adrian Bracjkovich to extend the transport depot at Lot 14 Great Northern Highway, Upper Swan.

The EPA considers that proposal presents an unacceptable long-term risk to Western Swamp Tortoise in the Ellen Brook Nature Reserve.

The EPA has therefore concluded that the proposal cannot meet the EPA's environmental objectives.

6. Recommendations

The EPA submits the following recommendations to the Minister for Environment:

1. That the Minister considers the report on the key environmental factors of water quality as set out in Section 3;
2. That the Minister notes that the EPA has concluded that the proposal cannot meet the EPA's environmental objectives for water quality;
3. That the Minister notes that the EPA has not included in this Report conditions and procedures to which the proposal should be subject, if implemented, because the EPA has concluded that the proposal should not be implemented.

Appendix 1

References

Burbidge, A.A., Kuchling, G. and Mutter, L. (2008) *Western Swamp Tortoise Recovery Plan 4th Edition 2008-2012* (in preparation). Department of Environment and Conservation, Western Australia.

EPA (2010), *Revised Draft Environmental Protection (Western Swamp Tortoise Habitat) Policy 2010*, report to the Minister for Environment, as required under section 28 of the *Environmental Protection Act 1986*. Environmental Protection Authority, Western Australia, October 2010

Greg Rowe and Associates (2010), *Proposed Extension to Existing Transport Depot Lot 14 (No 1527) Great Northern Highway, Upper Swan*, letter to the Office of the EPA. (Unpublished) 15 October 2010

Appendix 2

Identified Decision-making Authorities

Identified Decision-making Authorities

Section 45(1) of the *Environmental Protection Act 1986* (EP Act) requires the Minister for Environment to consult with decision-making authorities, and if possible, agree on whether or not the proposal may be implemented, and if so, to what conditions and procedures, if any, that implementation should be subject.

The following decision-making authorities have been identified for this consultation:

Decision-making Authority	Approval
1. City of Swan	Development Approval pursuant to Local Planning Scheme No. 17

Appendix 3

EPA advice on City of Swan LPS 17 Amendment 10



Environmental Protection Authority

The Atrium,
Level 8, 168 St Georges Terrace,
Perth, Western Australia 6000.
Telephone: (08) 6467 5000.
Facsimile: (08) 6467 5557.

Postal Address: Locked Bag 33,
Cloisters Square, Perth, Western Australia 6850.
Website: www.epa.wa.gov.au

Chief Executive Officer
City of Swan
PO Box 196
MIDLAND WA 6936

Your Ref LPS17-10
Our Ref A308073
Enquiries Karen Fearby 6467 5245

Attn: Shannon O'Loughlin

Dear Sir/Madam

DECISION UNDER SECTION 48A(1)(a) *Environmental Protection Act 1986*

SCHEME AMENDMENT TITLE:	City of Swan LPS 17 Amendment 10 Additional Use of Storage within an existing shed
SCHEME AMENDMENT LOCATION:	Lot 14 (No. 1527) Great Northern Highway
LOCALITY:	Upper Swan
RESPONSIBLE AUTHORITY:	City of Swan
DECISION:	Scheme Amendment Not Assessed - Advice Given (no appeals)

Thank you for your letter of 31 May 2010 referring the above proposed scheme amendment.

After consideration of the information provided by you, the Environmental Protection Authority (EPA) considers that the proposed scheme amendment should not be assessed under Part IV Division 3 of the *Environmental Protection Act 1986* (EP Act) but nevertheless provides the following advice and recommendations.

ADVICE AND RECOMMENDATIONS

1. Environmental Issues

- Contamination

2. Advice and recommendations regarding Environmental Issues

The EPA notes that this Amendment only relates to additional storage uses within the existing shed on Lot 14 Great Northern Highway, Upper Swan.

The EPA has an Environmental Protection Policy (EPP) - *Western Swamp Tortoise Habitat, 2002*, the purpose of which is to protect the habitat suitable for the long term survival of wild populations of the Western Swamp tortoise.

The EPA has previously provided advice to the City of Swan dated 21 June 2010, (enclosed) in regards to drainage on the site to ensure that no pollutants or spillage is carried into the Ellen Brook Nature Reserve (EBNR) and considers that the containing of potentially polluting substances within the shed, to which the above Amendment relates, may pose a risk to the habitat at the adjacent Reserve.

Accordingly, the previous advice still stands and the EPA expects that no hydrocarbons or other dangerous chemicals will be stored within the shed.

3. General Advice

- For the purposes of Part IV of the EP Act, the scheme amendment is defined as an assessed scheme amendment. In relation to the implementation of the scheme amendment, please note the requirements of Part IV Division 4 of the EP Act.
- There is no appeal right in respect of the EPA's decision on the level of assessment of scheme amendments.
- A copy of this advice will be sent to relevant authorities and made available to the public on request.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Colin Murray', written in a cursive style.

Colin Murray
Director
Assessment and Compliance Services

30 August 2010

Chief Executive Officer
City of Swan
PO Box 196
MIDLAND WA 6936

Your Ref LPS17-10
Our Ref CRN A308073
Enquiries Karen Fearby (6467 5245)
Email karen.fearby@epa.wa.gov.au

ATTENTION: Shannon O'Loughlin

Dear Sir/Madam

NOTICE REQUIRING FURTHER INFORMATION
Section 48C(1) of the *Environmental Protection Act 1986*

**SCHEME AMENDMENT: LPS 17 AMENDMENT 10 – LOT 14 GREAT
NORTHERN HIGHWAY, UPPER SWAN
RESPONSIBLE AUTHORITY: CITY OF SWAN**

Thank you for referring the above scheme amendment to the Environmental Protection Authority (EPA) under section 48A of the *Environmental Protection Act 1986* (EP Act).

The information provided in your documentation is insufficient for the EPA to make a decision on whether or not to assess the scheme amendment. Please note that, under section 81 of the *Planning and Development Act 2005*/section 33E of the *Metropolitan Region Town Planning Scheme Act*, the local government is required to provide to the EPA 'such written information about the town planning scheme or amendment as is sufficient to enable the EPA to comply with section 48A of the *Environmental Protection Act 1986*' (EP Act).

The Scheme amendment is located on land which is adjacent to the Ellen Brooke Nature Reserve which is the habitat of the critically endangered Western Swamp Tortoise and to which an EPA Environmental Protection Policy (EPP) - *Environmental Protection (Western Swamp Tortoise Habitat) Policy 2002* applies, this can be found on the EPA website or http://www.epa.wa.gov.au/docs/1092_EPP_WSTH02.pdf.

The Department of Environment and Conservation (DEC) has previously provided advice to the City of Swan on the 22 August 2006 in regards to the above property and, in relation to the current amendment, this advice still stands. A copy of this advice is attached for your information. The advice related to drainage management on the site to ensure that no pollutants or spillage is carried into the Reserve, the containing of potentially polluting activities on the site to within the shed, the storing of hydrocarbons on-site prohibited and the requirement for an onsite effluent management system. It is understood by the Office of the EPA (OEPA) that a Drainage Management Plan prepared to the satisfaction of the DEC and the City of Swan was a Condition on the Planning Approval for the Transport Depot in 2006.

In order for the EPA to review this scheme amendment and make a decision on whether or not the scheme amendment is to be assessed, the following information is requested:

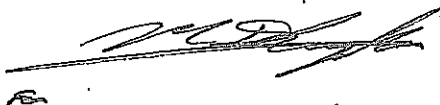
1. Required GIS Spatial Data (Note, the data specifically needs to show the spatial boundary of the Transport Depot in regards to the Planning Approval DA075/2006)

Spatial data of project area; spatial data should be provided in the following two ways:

- (a) Electronic spatial data- GIS or CAD on CD, depicting the project extent, geo-referenced and conforming to the following parameters:
 - datum: GDA94
 - projection: Geographic (latitude/longitude) or Map Grid of Australia (MGA)
 - format: Arcview shapefile, arcinfo coverages, Microstation or AutoCAD.
 - (b) Hard copy map or diagram of the project area, including geo-references.
2. In relation to Planning for this site, what conditions (or other measures) are in place to ensure that there is no further unauthorised expansion of facilities at this site or an escalation of potentially polluting activities? That is, how have the limits of development on this site been deferred and how will they be enforced?
 3. The current status of the Drainage Management Plan to be implemented at the site. If a Drainage Management Plan has been approved, please also provide a copy

Would you please forward the above information to the Chairman of the EPA, Locked Bag 33, CLOISTERS SQUARE, WA 6850, marked to the attention of Karen Fearby. When the EPA has received sufficient information, you will be notified in accordance with section 48A(1) of the EP Act.

Yours faithfully



Colin Murray
Director
Assessment and Compliance Services

21 June 2010



Department of
Environment

Your ref:

Our ref: DA-75/2006

Enquiries: File No.556/06

Direct tel:

Chief Executive Officer
City of Swan
PO Box 196
MIDLAND WA 6936

ATTENTION: Kate Parr

PROPOSED TRANSPORT DEPOT – LOT 14, NO. 1527 GREAT NORTHERN HIGHWAY, UPPER SWAN

Thank you for your correspondence dated 20 March 2006 seeking comment on the proposed Transport Depot at the above location. The Department of Environment and Conservation (DEC) has considered the development and provides the following advice. In providing comment on this application, the DEC notes that there is an existing shed and land use at the site and that development activity has continued at the site without existing approval.

The comments provided below should therefore be considered in the City's deliberations as to whether the existing development and use should be allowed to continue at this location.

As you are aware, the subject land is adjacent to the Ellen Brook Nature Reserve, habitat of the critically endangered Western Swamp Tortoise. Therefore, any development in the area will need to carefully consider both on and off site impacts and ensure the protection of this Reserve. Key issues are considered to be:

- Design and implementation of drainage measures to ensure that there are interceptor mechanisms (hydrocarbon interceptors) so that any pollution can be identified and cleaned up. In relation to storm events ensuring that flows are carried away from the Reserve so that any pollutants from traffic areas and spillage are not carried to the Reserve.
- Containing potentially polluting activities to inside the shed. This includes ensuring that the design of the facilities and outside hard-stand areas does not provide for unplanned maintenance activities to occur or provide for the storage of polluting materials and equipment.

Westralia Square
Level 8 141 St Georges Terrace
Perth Western Australia 6000
PO Box K822 Perth Western Australia 6842
Telephone (08) 9222 7000 Facsimile (08) 9322 1598
E-mail info@environment.wa.gov.au
www.environment.wa.gov.au



Hyatt Centre
Level 2 3 Plain Street
East Perth Western Australia 6004
PO Box 6740 Hay Street East Perth Western Australia 6892
Telephone (08) 9278 0300 Facsimile (08) 9278 0301
National Relay Service (Australian
Communication Exchange) 132 544
E-mail info@environment.wa.gov.au
www.environment.wa.gov.au

- Appropriate conditions to ensure that there is no further unauthorised expansion of facilities at this site or an escalation of potentially polluting activities.
- Monitoring to ensure that the management measures implemented are effective.

Officers from DEC met with the landowner's engineer (MJB Payne Consultants) on site to discuss the issue of drainage. Subsequently a revised drainage plan has been submitted.

Drainage

The revised design relating to the drainage component which takes the storm events to under the Gt Northern Highway is noted and the approach is supported. However, there are design aspects of the plan that will need to be considered in further detail prior to any construction. This includes the capacity of proposed ponds and their location. Accordingly, if the application is to proceed, it is recommended that a condition be applied to the proposal to prepare a drainage management plan to the satisfaction of the City of Swan on advice of the DEC. Additionally, the inclusion of a bund around the whole perimeter of the property may potentially introduce the requirement for additional fill material to be imported to site. Building rubble material that has been used in the past to construct roadways is not considered acceptable. It is therefore recommended that the bund be constructed as shown on the southern and western boundary but be connected to the wall of the western stormwater pond at this time. This bund is viewed as being necessary to contain any stormwater with sediments arising from the hardstand and traffic areas and as a last resort containment measure primarily to contain any pollution that escapes the drainage around the shed and hardstand areas. The implementation of this bund including, if required; a controlled point of release to the larger property can be considered as part of the overall requirement for a management plan. The drainage management plan should also include monitoring of surface water and pond sediments to ensure that the ponds are not being contaminated.

Hard-Stand and Storage Areas.

All activities relating to this property should be contained within the shed and to the eastern side of the property given the proximity of the reserve to the western boundary. The landowner has advised that for insurance purposes an access road is required around the shed. This road has been widened at the rear of the shed to include a hard-stand storage area. There should be no provision for storage at the rear of the shed. This includes inert materials. The reason for this is that if any storage is allowed, it is likely that other potentially contaminated items such as disused machinery may eventually be stored there. These items can leak or be worked on and contaminate the land. Minimum access requirements around the shed should be determined, the excess road base removed, bollards placed to define the boundary of the access way and signposting placed to inform that no storage of any kind is to occur in this area.

This approach does however introduce the requirements that all storage is to occur in front of the shed. The DEC has no comment to make on the visual consequences of taking this approach and that, if considered significant, this is a matter for the City to address through requirements for screening, fencing etc.

Hydrocarbon Storage

There is to be no bulk storage of hydrocarbons on this site.

Caretaker Facilities

An appropriate onsite effluent management system should be selected for this site giving consideration to the poor drainage characteristics and nutrient management.

Conditions

The key outcome sought in relation to any conditions is that further uncontrolled expansion in either the area or the activities should be controlled and existing lay down areas at the rear of the shed should be reduced to only provide for minimum vehicle access. It is recommended that a conditional approval, if issued, should clearly define limits of development. As indicated, a drainage management plan should also be a requirement. This plan should be to the satisfaction of the City of Swan on advice of DEC and include a final drainage design, design and implementation of the bund, development of a soil and water quality monitoring program and requirements that the plan is implemented with appropriate survey control.

Should you have any queries, please contact Mark Jefferies on 6467 5403.

Yours faithfully

Mark Jefferies

W Tacey

A/DIRECTOR

ENVIRONMENTAL IMPACT ASSESSMENT DIVISION

22 August 2006

Cc K Brajkovich

DEC – Attn: J Maguire, Lyndon Mutter Locked Bag 104, Bentley Delivery Centre
6983

Belton Taylforth – PO Box 429 Midland 6936

MJB Payne Consultants – 17 Leithdale Road Darlington 6070