

SCHEDULE OF SUBMISSIONS – P219421
Animal Husbandry (Feedlot) – Amended Application
355 (Lot 100) Treeton Road, Cowaramup

SUB-MISSION NO.	SUBMITTER (Name & Address)	SUMMARY OF COMMENTS	OFFICER COMMENT	RECOMMENDATION
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Private Submissions – Support				
1.	PA380146	No comments	Noted	Nil
2.	PA380152	No comments	Noted	Nil
3.	PA380149	No comments	Noted	Nil
4.	PA380154	No comments	Noted	Nil
5.	PA380147	No comments	Noted	Nil
6.	PA380161	No comments	Noted	Nil
7.	PA378315	No comments	Noted	Nil
8.	PA378316	No comments	Noted	Nil
9.	PA378313	Fully supports proposal.	Noted	Nil
10.	PA380151	Improvement on current operation.	Noted	Nil
11.	PA380156	Improvement moving away from roadside	Noted	Nil
12.	PA380165	<ul style="list-style-type: none"> • Supports feedlot being brought up to current environmental standards • Supports farming and produce to stay in the southwest. 	Noted	Nil
13.	PA380155	<ul style="list-style-type: none"> • Been moved to a better location and away from public road. • Allow for the continuation of a farming activity that's been happening for generations. 	Noted	Nil
14.	PA380170	<ul style="list-style-type: none"> • Support produce being reared locally; • Feedlot has been moved to a better location which is an improved outcome for the farmers, neighbours and environment. 	Noted	Nil
15.	PA380169	<ul style="list-style-type: none"> • Support new location. • Important to keep long term agricultural operations in the Shire and allow for expansion of operations to facilitate this. 	Noted	Nil
16.	PA379749	<ul style="list-style-type: none"> • Support produce being reared locally; 	Noted	Nil
17.	PA379751	<ul style="list-style-type: none"> • Improved visual amenity; 	Noted	Nil

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		<ul style="list-style-type: none"> • Improved setback from watercourse; • Economic benefits to community and associated suppliers; • Support feedlot being brought up to current environmental standards. 		
18.	PA379427	<ul style="list-style-type: none"> • Support local families in agricultural pursuits such as this. 	Noted	Nil
19.	PA379428	<ul style="list-style-type: none"> • Long term farmers in district who show great care and respect for livestock; • Expect that the feedlot will be managed responsibly and with industry best practice. 	Noted	Nil
20.	PA379750	<ul style="list-style-type: none"> • Proposed location an improvement on current location due to the increased setback to watercourse; • Proposed location will improve visual amenity for other businesses; • Support the feedlot continuing to operate seasonally; • Provides support for local business and adds diversity to local economy; • Many local farms produce cattle suitable for entry to feedlots, accordingly the proposal will help the local economy. 	Noted	Nil
21.	PA378735	<ul style="list-style-type: none"> • Seen feedlot in full operation and was surprised how dry and clean it was and in the winter months its seeded and left. 	Noted	Nil
22.	PA378732	Feedlot has been moved to a better location which is an improved outcome for the environment.	Noted	Nil
23.	PA378730	<ul style="list-style-type: none"> • Support produce being reared locally; • Supports operations being brought up to modern farming standards. 	Noted	Nil

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24.	PA378731	<ul style="list-style-type: none"> • Feedlot has been moved to a better location which is an improved outcome for the environment; • This will also improve the effluent management for the operation. 	Noted	Nil
25.	PA378314	<ul style="list-style-type: none"> • Use is located on agricultural land and allows for value adding to produce; • Provides extra employment to community; • Cattle feedlots are an agricultural pursuit and are no different to dairy or poultry. 	Noted	Nil
26.	PA379430	<ul style="list-style-type: none"> • Feedlot is important to the S/W cattle market as cattle are sourced locally adding competition and more value for producers. • Note cattle industry being the first major agricultural industry in the Shire. 	Noted	Nil
27.	PA380159	<ul style="list-style-type: none"> • Feedlot has been moved to a better location which is an improved outcome for the environment. • Supports operations being brought up to modern farming standards. 	Noted	Nil
28.	PA380171	<ul style="list-style-type: none"> • Strongly suggest planting tree shelter belts to further wineries/café next door <ol style="list-style-type: none"> a) Buffer potential dust/odour to neighbours. b) Shelter to animals/staff from weather c) Block view of feedlot from Treeton Road 	Noted. It is agreed that a landscape buffer would be beneficial to the final form of the development if approved.	Introduce the requirement for a landscaped buffer by way of condition, should the application be approved.
29.	PA380153	<ul style="list-style-type: none"> • Use is consistent with the rural area it 	Noted	Nil

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		<p>is located within and should have the ability to expand.</p> <ul style="list-style-type: none"> • Feedlot has been moved to a better location which is an improved outcome for the environment; • Upgrade will provide more fresh local produce and more jobs. 		
30.	PA380148	<ul style="list-style-type: none"> • Applicant is good farmer and does the right thing for the environment • Need to keep farmers in business can't rely on tourism alone, need other industries. 	Noted	Nil
31.	PA380150	<ul style="list-style-type: none"> • Farm can't sustain a wage without being a viable feedlot • Katchana Beef spend a lot of money locally within the Shire. • Need agricultural now more than ever 	Noted	Nil
32.	PA379748	<ul style="list-style-type: none"> • Recent Covid-19 times has highlighted the importance of Australia's food supply • 4th generation farmers and surrounding neighbours who came later should be mindful the feedlot was already operating. 	Noted	Nil
33.	PA380168	<p>Have decided to move the feedlot despite there being no evidence of issues with the current operation.</p> <p>Have been subject to false accusation and allowing tourism uses into rural zoned areas is possibly not a good idea, but have tried to work alongside other businesses.</p>	<p>Noted</p> <p>Noted</p>	<p>Nil</p> <p>Nil</p>

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		<p>Moving the feedlot and bringing it up to modern standards will hopefully alleviate all issues with current operations by moving it out of sight, improved effluent management, growing trees, keeping animals together will give better environmental outcomes.</p> <p>Land is zoned Priority Agriculture and is most suited to productive uses.</p> <p>Venture is costing a large amount of money and it is important to keep production local in times of uncertainty.</p> <p>Thought of having to move off the land is saddening.</p> <p>Being accused of increasing traffic is hypocritical when considered in the context of other tourism uses and their traffic generation.</p> <p>Tourism and farming need to be able to work together.</p> <p>Only farm seasonally and this is important to the Australian market.</p>	<p>The new proposal will be assessed against modern requirements.</p> <p>Noted, LPS1 seeks to ensure primacy of agricultural use in the zone.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>Nil</p> <p>Noted</p> <p>Nil</p> <p>Nil</p> <p>Nil</p> <p>Nil</p> <p>Nil</p>
34.	PA380162	While providing qualified support for the application the submitter considers that the process of feeding grain to cattle in paddocks surrounding the feedlot pens is	The practice of grazing surrounding paddocks at higher than typically sustainable densities is considered to constitute part of the feedlot	If approved, include conditions to regulate the density of stock on the land outside of the

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		not justified. When the feedlot is dormant cattle are grazed in paddocks and moved to other paddocks as grass is depleted. During operation of the feedlot stock is held on the balance of the property and hand fed grain in much greater than sustainable densities. Enforceable controls need to restrict this practice.	operations and should be regulated if the proposal is approved.	feedlot pens.
35.	PA380157	A number of clarifications in relation to the current application are set out that are reflected in the report to Council.	Noted	Nil
Private Submission - Indifferent				
36.	PA380158	Suggest that visual impact of the feedlot could be reduced by contour bank planted with trees.	See response to submitter 28.	Noted
Private Submissions – Object				
37.	PA380500	<ul style="list-style-type: none"> • Concern regarding odours, particularly in south westerly winds. 	The issue of the potential impact of odours is discussed in the Council report and dealt with primarily through separation distances required in accordance with the s-factor calculation methodology detailed in the report.	Noted separation distance requirements and operating controls (removal of manure, seasonal operation and expectations of amenity).
38.	PA378733	<ul style="list-style-type: none"> • Concern proposal will devalue property; • Concern regarding odours, 	<p>The potential impact on property values isn't a relevant planning consideration. The key issue in relation to enjoyment of land from a planning perspective is what is a reasonable impact on amenity.</p> <p>See response to submitter 37 regarding odour.</p> <p>Conditions have been proposed on</p>	<p>Note.</p> <p>Note compliance</p>

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		<ul style="list-style-type: none"> Concern regarding ongoing compliance/management to ensure correct numbers of cattle, vehicle trips and waste removal. 	<p>the approval to limit the number of cattle, vehicle trips and waste management arrangements associated with the use. Failure to comply with these measures can result in infringements being issued and prosecution for repeated noncompliance. The critical test is that conditions are specific, measurable and reasonable.</p>	<p>processes available.</p>
39.	PA380167	<ul style="list-style-type: none"> Refute the claim regarding the seasonal use of the property. Agree with comments made by submitter 46 relating to property devaluation. Agree with comments made by submitter 46 relating to loss of amenity, damage to water systems and hydrology separations and effluent waste. 	<p>Conditions have been imposed on the approval to limit the number of cattle which is varied depending on the time of year. Failure to comply with these measures can result in infringements being issued and prosecution for repeated noncompliance.</p> <p>Refer to response to submitter 38 regarding property value.</p> <p>See responses to submission 46 in response to Visual Amenity/Landscape Impacts, Water/Hydrology Impacts, and Effluent Management.</p>	<p>Note compliance processes and specific conditions in this regard.</p> <p>See response to submission 38.</p> <p>See response to submission 46.</p>
40.	PA378734	<ul style="list-style-type: none"> Concern regarding odour. Concern regarding increased fly 	<p>See response to submitter 37 regarding odour.</p> <p>See response to submitter 46 regarding effluent management.</p>	<p>Note previous response.</p> <p>Note response to submission 46.</p>

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		<p>numbers due to effluent which can cause issues for nearby agricultural uses.</p> <ul style="list-style-type: none"> • Concern regarding impacts on water availability; • Concern regarding stock breakouts owing to the large number of stock kept on the property. <p>Concern the use will impacts the other agricultural enterprises, tourist and lifestyle land uses.</p>	<p>The legislation for water take is entirely structured around allocation under the Rights in Water and Irrigation Act, administered by DWER, advice provided from that body as the independent experts on sustainable allocation guides the Shires decision making on this.</p> <p>Response to stock breakouts. The risk associated with stock break out is a farm management matter and not a planning concern. The management of stock on the site is speculative and if necessary, local laws can be utilised to take action against the landowner if stock containment is not adequate.</p> <p>This issue relates predominantly to the potential for land use conflict. The report discusses this issue in detail, specifically that appropriate measures are required to protect an essentially agricultural level of amenity.</p>	<p>Note.</p> <p>Note.</p> <p>Note the discussion of amenity and expectations of use in the Shire report.</p>
41.	PA380163	Concern regarding lack of written confirmation from Department of Primary Industries and Regional Development (DPRID) on submission and discrepancies	Noted, the proposal has been referred to DPIRD who do not object to the proposal.	Note the submission received from DPIRD.

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		<p>in the information provided.</p> <p>Concern regarding stocking rate calculations, based on 200kg cattle weight when they have typically bought in at 300kg, and sold at 550kg, calculations do not account for this.</p> <p>Concern about compliance with the Beef Cattle Feedlot Environmental Code of Practice to avoid feedlots on high ridgeline and exposed sites which is considered to be the case here.</p> <p>Proposal does not meet objective of the Priority Agricultural zone in preserving the rural activity, character and amenity.</p> <p>Propose does not meet objective of the Priority Agricultural zone in enhancing the environmental qualities of the landscape and promote sustainable environmental management practices.</p> <p>Concern regarding cumulative impact on ground water between Western Meat Processors and subject use, which are less than 1.5km apart.</p>	<p>Refer to DPIRD comments below.</p> <p>See response to submitter 39 regarding Visual Amenity/Landscape Impacts.</p> <p>See response to submitter 39 regarding Visual Amenity/Landscape Impacts.</p> <p>See response to submitter 39 regarding Water/Hydrology Impacts and Effluent Management.</p> <p>See response to submitter 39 regarding Water/Hydrology Impacts and Effluent Management.</p>	<p>Stocking rates are specifically discussed in the covering report.</p> <p>The issue of amenity and landscape impact is discussed in the covering report.</p> <p>See discussion of consistency with zoning in covering report.</p> <p>Note assessment against environmental management standards in the Code of Practice.</p> <p>Note controls to mitigate impacts on groundwater.</p>
42.	PA380160	Concern that the proposal will not meet the Environmental Protection Act requirements pertaining to Odour. Request that an Operational Odour Analysis be undertaken.	See response to submitter 37 regarding odour.	Note.

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		<p>Concerns regarding noise impacts associated with projected noise from cattle.</p> <p>Concern that wastewater produced by the cattle (urine) has not been factored into the overall wastewater calculations.</p> <p>Content that the way in which the separation distances have been calculated is incorrect.</p> <p>The proposed use is in proximity to an Environmentally Sensitive Area in accordance with the RWIW Act</p> <p>The proposal does not take into account the topography of the site.</p>	<p>Noise is one of the issues to be considered by DWER in the works approval and licensing process. There is no objective issue with noise in relation to current operations.</p> <p>See response to submitter 39 regarding Water/Hydrology Impacts and Effluent Management. The relevant guidelines specifically note that urine is mostly lost to evaporation.</p> <p>Refer to comments below from DPIRD, separation distances have been achieved.</p> <p>Refer to comment provided by the Department of Water and Environmental Regulation below. Nearest ESA is about 6.3km away to the north east, unless they are using this to describe the creek?</p> <p>Noted, this has been raised by DPIRD and has been addressed by the applicant by providing additional cross-sectional drawings.</p>	<p>Note.</p> <p>Note.</p> <p>See content in covering report.</p> <p>Note.</p> <p>Include conditions requiring the constructed levels to be verified by survey prior to construction and certification post</p>

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		<p>Several of the criteria of the National Guidelines for Beef Cattle Feedlots in Australia have not been considered including:</p> <ul style="list-style-type: none"> • Distance to nearest receptors for aesthetic impact; • Proximity to abattoirs, saleyards and other services; • Legal and physical access to adequate water; • Soil (geotechnical qualities); • Amenity impacts. <p>The guidelines state that feedlots should not be sited over naturally recharging springs.</p> <p>Multiple concerns around water and hydrology and effluent management including:</p> <ul style="list-style-type: none"> • Lack of details about the 	<p>See DPIRD comments regarding separations distances in the context of the National Guidelines.</p> <p>This matter will be explored through the works approval process currently subject of assessment with the Department of Water and Environmental Regulation. The site information available details a significant depth to groundwater.</p> <p>See response to submitter 39 regarding Water/Hydrology Impacts and Effluent Management.</p>	<p>construction.</p> <p>See discussion in covering report regarding s-factor distances.</p> <p>Note.</p> <p>Note.</p>

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		<p>contamination of stormwater by the operation between July to October outside of non-operational month in June. Concern about higher than average June rainfall not being captured by the evaporation pond.</p> <ul style="list-style-type: none"> • Diversion of run off into the environment In July, August, September and October. • Comments in submission around land capability limitations for the feedlot area due to low permeability. Suggest that additional studies should be undertaken. • Expansion of Dam to source clay and lack of comment around downstream impacts as a consequence of this; <p>Concern about the accuracy of the separation distance calculations based on the following:</p> <ul style="list-style-type: none"> • Lower rainfall factor applied; • separation distance to the dwelling to the north-north west should be 614 instead of 506m in report, dwelling to the south-south west not included at 332m. • Climatic data from Witchcliffe used in calculations instead of Cowaramup. <p>Following concerns with the risk assessment of discharges and emissions:</p>	<p>See DPIRD comments regarding separations distances in the context of the National Guidelines and the assessment in the covering report regarding the s-factor calculations. There is no weather station in Cowaramup.</p> <p>These matters will be explored through the works approval process currently subject of assessment with</p>	<p>Note.</p> <p>Note.</p>

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		<ul style="list-style-type: none"> • Contend that consequence of groundwater contamination is 'moderate' as opposed to 'slight'; • Contend that consequence of surface water contamination is 'moderate' to 'major' as opposed to 'slight'; • 'Low' classification for dust risk is not a category and has not been substantiated; • Noise – operating hours are discussed but cattle noise is not taken into account. Suggest 'slight' rating should be 'moderate'. • Suggest 'possible' rating for odour issues should be replaced with 'likely'. <p>Concern regarding a number of errors and inaccuracies in application including:</p> <ul style="list-style-type: none"> • 1000 head capacity proposed, but production design capacity at 5000, calculation based on 100 head; • Reference to Witchcliffe climatic data. 	<p>the Department of Water and Environmental Regulation. See response to submitter 39 regarding Water/Hydrology Impacts and Effluent Management. See above response to this submitter regarding noise. See response to submitter 37 regarding odour.</p> <p>This is a reference to the category of the application rather than the numbers actually proposed in the application.</p>	<p>Note.</p>
43.	PA379429	<p>Concerned that the separation distances are inaccurate for the following reasons:</p> <ul style="list-style-type: none"> • Annual rainfall of <750mm is incorrect; • This translates to a separation distance of 614m in lieu 481m provided; 	<p>See DPIRD comments regarding separations distances in the context of the National Guidelines and assessment in covering report.</p>	<p>Note.</p>

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		<ul style="list-style-type: none"> • Contend the wind value is inaccurate which would increase distance further; • Based on history of the development it is questionable whether the proposal will meet the performance aspects of the standard relating to surface water, ground water, community, ecology and resources. <p>The use has previously contaminated the watercourses in the vicinity flowing into the Carbanup River.</p> <p>Concern that the use will cause significant Odour impacts. Contend that odour impacts will be greater than that suggested by the proposal given issues with rainfall calculations.</p> <p>Comments in the guidelines around managing feedlots in proximity to uses that have reasonable levels of visitation. Combination of prevailing winds and peak visitation of nearby brewery in summer will lead to loss of amenity at this venue and land use conflict.</p> <p>Consider that the use doesn't provide sufficient separation to sensitive land uses in accordance with the "guidance for the Assessment of Environmental Factors – Separation Distances between Industrial</p>	<p>See response to submitter 39 regarding Water/Hydrology Impacts and Effluent Management.</p> <p>See response to submitter 37 regarding odour.</p> <p>See response to submitter 40 regarding land use conflict.</p> <p>Noted. See DPIRD comments regarding separations distances in the context of the National Guidelines.</p>	<p>Note.</p> <p>Note.</p> <p>Note.</p> <p>Note.</p>

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		and Sensitive Land Uses of 1000 to 2000m.		
44.	PA381372	<p>Submitter provided analysis from an Environmental Earth Scientist.</p> <p>Concern raised regarding the likely impacts on water ways on the site, adjoining dams and the Carbarup River. Consider contamination is inevitable.</p> <p>Comments from Environmental Earth Scientist:</p> <p>Consider that soil analysis is inadequate which is a critical component for the design of the feedlot based on the following:</p> <ul style="list-style-type: none"> • No indication of sampling technique – samples should be taken in situ whenever possible – when tested in a lab the soil needs to be recompacted to a representative density by artificial compaction. • Trench excavated to test soils was up to 100m to the east of the feedlot sediment trap which could misrepresent results. Trench appear to be located on a sub-surface drainage line. • No classification of on soil horizons (pedomorphic or stratigraphic) which 	<p>Noted.</p> <p>See response to submitter 39 regarding Water/Hydrology Impacts and Effluent Management.</p> <p>These comments have been provided to the applicant's consultant who prepared the soil capability report. Further confirmation that soil compaction and composition requirements have been met will be required post construction. In a worst-case scenario, additional material would need to be brought to site for construction. This has the potential to significantly increase the cost of construction.</p>	<p>Note.</p> <p>Measures are included as recommended conditions and through design to mitigate risk.</p> <p>Note certification requirements post construction.</p>

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		<p>can have a bearing on the composition of underlying soils;</p> <ul style="list-style-type: none"> • Inconsistencies around the presence of gravel between the onsite analysis and the table in the provided report, this may suggest that gravel was removed as a part of the analysis and if this was the case explanation should be provided as to why. • Question several elements of analysis, including: <ul style="list-style-type: none"> a) Horizon 1 classed as organic matter but should be more accurately classed clayey sand; b) Horizon 2 is described as grey gravel but should be described as Sandy Clay Loam; c) Horizon 3 appears to be mottled clay and gravel and has the potential to provide a perched water table at this depth; d) Horizon 4 described as fines and sand but is described as containing grit in in Table 2. • Figure 6 in the report outlined hydraulic conductivity fails to locate where the soils of the proposed feedlot fit. • Images of the trench show gravel up to 65mm, which is classified as 'cobble'; 		

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		<ul style="list-style-type: none"> • Photo shows upper two metres of the trench suggest that the soil is stratigraphic meaning it is transported soil material and unlikely to represent the soil at the feedlot; • Comment that gravelly and loamy soils are the primary soils are inconsistent with the data in the report; • Complexity of the soil warrants further analysis for the feedlot area to inform recommendations; • No discussion on the effect of trampling by the cattle on the clay liner, consider that the slope required and movement of cattle in the pen will lead to the liner failing; • Consider that there is no data supporting statement that clay is compliant with relevant guidelines or evidence to suggest that the base of the detention pond will provide additional impedance to leaking. • Analysis does not address the liquid limit, plasticity Index and emersion class number of the required in the National Guidelines for Beef Cattle Feedlots in Australia; • Statement that the soil type at feedlot is grey sandy clay over gravel is not supported. • Inconsistencies on slope of pen (3 degrees or three percent) without details as to how these will be 		

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		<p>achieved.</p> <ul style="list-style-type: none"> • Lack of detail on how the central drainage line will be compacted and permeability levels will be achieved and maintained. • No detail on method of compaction of batters of sediment trap and silt trap or maintenance; • No discussion on maintenance of clay liner in pen; • Lack of detail or analysis of clay types within the report; • Suggest that there is not appropriate data to ensure that the project will meet environmental management requirements. 		
45.	PA380277	<p>Location and scale of the intensive farming use should not be supported in this location.</p> <p>Discusses the history of the site which is has been covered in the Background section of the report.</p> <p>Contends that the feeding of additional cattle in toughs outside of the dedicated feedlot area would still constitute a</p>	<p>An animal husbandry use is one that is capable of being considered in the Priority Agriculture zone where approval has been granted by the Shire where impacts associated with the use can be satisfactorily managed.</p> <p>In the context of the planning system a distinction is made between animal husbandry use and the existing extensive horticultural use (grazing).</p> <p>The existing use of the site for grazing would continue to apply across the site, the assessment</p>	<p>Note.</p> <p>Note.</p> <p>Note.</p>

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		<p>'feedlot'.</p> <p>Consider that the existing feedlot approvals should be revoked given alleged non-compliance with conditions of planning approval. Little support offered by Shire to enforce conditions and this has resulted in impacts on winery in terms of water pollution, landscape amenity, odour.</p> <p>Coefficients used to calculate separation distances under the guideline and codes of practice are incorrect given that these are based on rainfall less than 750mm resulting in lower separation distances. Contends that the feedlot cannot meet sensitive receptors surrounding the site.</p> <p>Inconsistent with the recommendations of the MLA guidelines related to annual rainfall and location within a tourism area.</p> <p>Inconsistencies in the stocking area defined outside the feedlot area, whether this is limited to the property north of Treeton Road or overall lot and leased areas combined. Contend that stocking rates for this area are calculated</p>	<p>focuses on the change or intensification of use through the establishment of the feedlot area. The practice of higher density stocking through the site more broadly has been addressed in the covering report.</p> <p>Noted.</p> <p>See DPIRD comments regarding separations distances in the context of the National Guidelines.</p> <p>See DPIRD comments for assessment against the National Guidelines.</p> <p>This issue is considered in the covering report. Only the Site (Lot 100) is considered in the application.</p>	<p>Note.</p> <p>Note.</p> <p>Note.</p> <p>Include condition limiting stock numbers outside the feedlot area.</p>

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		<p>incorrectly. Calculation suggest 850 cattle can be held outside the feedlot however taking into account arable land would be limited to approximately only 85% of the site and the cattle weight would average 300kg, this would be 575 cattle.</p> <p>Consider that the above would lead to the whole premises becoming a prescribed premises and require works approval from DWER.</p> <p>Consider that method of manure disposal need to be explicitly outlined, suggesting that it will be taken off site is not specific enough. Suggest that that the proponent has underestimated the manure disposal in using the proposed capacity rather than throughput.</p> <p>Consider that the feedlot should be empty for May given historical high rainfall events in this month.</p> <p>Consider that covered area for the feedlot is not sufficient, not unreasonable for whole area to be covered given rainfall quantities to reduce moisture and better protect water ways, reduce odour and create better environment for the animals.</p>	<p>Agree that higher stocking rates outside of the dedicated pens would constitute feedlot.</p> <p>The method of disposal of manure, to remove from site, is a suitable method of dealing with this issue.</p> <p>This issue is discussed in detail in the covering report. Destocking through May will significantly reduce risk and effects from the feedlot, however, further restrictions may be imposed by DWER.</p> <p>The feedlot is proposed through the dry summer months.</p>	<p>Restrict stocking rates outside feedlot area.</p> <p>Note.</p> <p>Note destocking to be undertaken through May.</p> <p>Note.</p>

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		<p>Suggest that a mechanical screen and vegetation belt should be provided to reduce visual impact and odour impacts.</p> <p>Wastewater system does not deal with high rainfall events that occur frequently during operating period. Additional details required around the release of the effluent 'into the surrounding environment' in other months, a tree lot or other means of preventing nutrients entering the ground water should be utilised. Consider that due to the cool climate of the south west that an evaporation pond is not a viable option for the site.</p> <p>Consider that the location is proposed to be located more than 100m from a watercourse and avoid having to obtain a licence from DWER.</p> <p>Prove the following comments relative to the Shires Local Planning Scheme:</p> <ul style="list-style-type: none"> • Aim 1.6.1 - Biodiversity and Environmental Values - consider that the use proposed is likely to lead to watercourse contamination as it has in the past; • Aim 1.6.2 Landscape and Visual Qualities – consider that the proposal is overly intensive for the given location and will impact the landscape qualities of the area; • Aim 1.6.3 Lifestyle and Community 	<p>Detail of the wastewater system is included in the covering report. Full technical analysis will be undertaken by DWER.</p> <p>See response to submitter 39 regarding Visual Amenity/Landscape Impacts. See response to submitter 37 regarding odour.</p> <p>See response to submitter 39 regarding Water/Hydrology Impacts and Effluent Management.</p>	<p>Note.</p> <p>Note.</p> <p>Note.</p>

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		<p>Identify – consider that the proposal has not fostered a strong sense of community and fractured neighbourly relations;</p> <ul style="list-style-type: none"> • Aim 1.6.5 Agricultural and Rural Land Use – consider that the use does not promote best practice agriculture; • Aim 1.6.6 – Tourism - the proposal is located within close proximity to Brookwood estate wines, Tassell Park Wines and the Cowaramup Brewing Company, the proposed use will not contribute to tourism and will detract from the after mentioned tourism uses. • Aim 1.6.7 Shire Economy – unknown what economic value adding opportunities arise from the proposal for the local community. Contends that if the use impacts nearby tourism operations that this will act to detract from the diversity of the local economy. • Aim 1.6.9 Sustainable Land Use and Development - Consider that the proposal will not provide improved sustainability given that it does not appear to be adhering to the code of conduct for this type of operation. • Objective of Priority Agriculture Zone 4.2.2.1 relating to landscape amenity and environmental management will not be met owing to reasons previously outlined. 		

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		<ul style="list-style-type: none"> • Consider that the proposal should be refused in accordance with clause 5.14.1 as it relates to incongruous development. • Concerns that the proposal will not meet clause 5.21.1 which prevents stormwater or liquid from any source into a creek or watercourse. • Consider that the proposal has not been provided with sufficient supporting information and for this reason it cannot be determined that the proposal is consistent with the orderly and proper and planning of the locality or entertain the proposal; • Content that the proposed use would be incompatible with the surrounding land uses as clause 67(m) of the deemed provisions of Local Planning Scheme No.1; • Inconsistency with clause 67(n) as there is limited supporting information to verify that the proposal will not have environmental consequences, additionally the scale and proximity to sensitive uses of the use is unprecedented; • Inconsistency with clause 67(o) regarding impacts on water recourses – the current development has allowed run off to enter the Carbanup River. The new location will increase separation to watercourses but 	<p>The applicant is required to obtain a works approval from DWER.</p> <p>See response to submitter 39 regarding Water/Hydrology Impacts and Effluent Management.</p> <p>See response to submitter 39 regarding Visual Amenity/Landscape Impacts.</p> <p>See response to submitter 40 regarding land use conflict.</p>	<p>Note.</p>

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		<p>remains in close proximity to a dam and tributaries to the north;</p> <ul style="list-style-type: none"> • Inconsistency with clause 67(q) regarding land degradation as the rainfall will exceed evaporation rates which increases odour, and for this reason the land is not suitable; • Inconsistency with clause 67(w) which relates to the history of the site, in that the applicant has not put in place adequate land management practices in the existing operation of the site; • Due regard given to the submission received, MLA Guidelines and the Environmental Code of Conduct in accordance clause clause 67(w) and (zb) <p>Recommend that decision on proposal be made by elected members as opposed to staff under delegation for reasons previously outlined.</p> <p>Whilst categorically opposed to the feedlot, if the use is approved the following conditions and requirements should be applied:</p> <ul style="list-style-type: none"> • Be operated under a DWER licence; • Reduce capacity as per MLA guidelines and so that the use is auditable; • Have fully covered feedlot pens; • Have mechanical screening and 		

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		<p>vegetative screening to reduce visual and odour impacts;</p> <ul style="list-style-type: none"> • Subject to annual auditing; • Provide proof of water licences • Subject to an impact assessment from an ecological, aesthetic and community standpoint; • Exiting site is decommissioned and a rehabilitation plan is prepared for approval. <p>Without the above, the proposal should be refused for the following reasons:</p> <ul style="list-style-type: none"> • Environmental impacts due to erosion land degradation and groundwater contamination • Adverse amenity impacts dues to odour, visual impacts and fly breeding; • Negative economic impact on surrounding land uses due to land use incompatibility; • Overwhelming lack of support from neighbours. 	Noted.	
46		<p>Impacts on property value; Approval of feedlot will diminish amenity of property and those nearby. Financial value of the property which has been in the family for a number of years. Appraisal attached by Acton indicating the feedlot would devalue the property in the long term.</p>	Refer to response to submitter 38 regarding property value.	Note.

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		<p>Planning approval recently obtained for a dwelling within 470m of the Dam which would be subject to dust, flies, odour noise and effluent.</p> <p>Traffic Management. When establishing a feed lot information needs to be supplied which outlines the manner in which the feed and cattle will be transported to and from the site and the implications of this.</p> <p>Use will need 14 – 17 tons of feed, lack of detail provided in respect to the transport to facilitate this.</p> <p>Impacts associated with multiple deliveries provided to feed stations located on the site, combined with movement across the site onto and off Treeton Road will require the formalisation of the access and egress points.</p> <p>Sufficient space required on site for carparking to meet the relevant Australian standard not demonstrated including large vehicles required for haulage;</p> <p>Proposal requires assessment against Infrastructure policy LPP7 as it applies to restricted access vehicles. Contend that these will be required in the operation and insufficient detail has been provided to allow assessment.</p>	<p>See covering report in relation to s-factor separation distances.</p> <p>Traffic movements have been described in the report. The road is sufficient for the use with some minor improvements.</p>	<p>Note separation distance requirements.</p> <p>Apply conditions for road upgrade requirements and traffic management plan.</p>

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		<p>Other Guidelines Consider other guidelines are important in informing the Shires Assessment. Most notably the MLA Guidelines. MLA Guidelines MLA Guidelines separation distance would be closer to 1700m using correct factors; Contend that the applicant does not meet required separation distances based on the following:</p> <ul style="list-style-type: none"> • Buffers should be 614m and 523m south based on objectors calculations; • Nearby abattoir has not been taken into account; • Contend that inaccurate wind data has been used in calculations; • Buffer distances do not include feed manufacture. <p>Number of MLA site selection criteria are not met including:</p> <ul style="list-style-type: none"> • Climate; • Cost of feed in area; • Topography; • Insufficient land area surrounding feedlot; • Water supply and security; • Geotechnical inaccuracies; • Composting pads or silage bunks not specified; • Amenity impacts including visual, 	<p>In determining a planning application, the fundamental document that needs to be considered is the Local Planning Scheme. This provides capacity for due regard to be given to a range of matters, but some of the guidelines provided relate more to the assessment of the proposal by DPIRD or DWER, both of which have provided feedback on the proposal. In addition the relevant guidelines have been fully considered. See DPIRD comments regarding separations distances in the context of the National Guidelines.</p> <p>Many of these are not actually part of the development guidelines but guidance for site selection, where relevant these matters have been addressed in the covering report. It should also be noted that elements of detail will be provided by way of detailed engineering design of particular elements and measures for certification of works to meet the guidelines.</p>	<p>Note.</p> <p>Apply conditions to any approval regarding engineered design of particular elements and certification of construction prior to operation.</p>

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		<p>odour and noise;</p> <ul style="list-style-type: none"> • Lack of details of turning areas for truck movements associated with the use; • Lighting and power supply; • Staffing, processes and procedures; • Proximity between feedlot and evaporation pond; • No staging plan; <p>EPA Separation Distance Guidelines EPA Separation distance guidelines require 1000 – 2000m separation between a feedlot and other sensitive uses which will not be met.</p> <p>Lack of details Australian Animal Welfare Standards and Guidelines, lack of separation between effluent pond and pens, 40m should be provided to minimise health impacts on the cattle.</p> <p>Application Content Contend that the Shire has not made all material with the current amendment available, which has complicated providing feedback on the proposal.</p> <p>Contend that the application is incomplete based on the following:</p> <ul style="list-style-type: none"> • Application form not signed by owner; 	<p>Note that more contemporary guidelines and code of practice utilised as the standard by DWER.</p> <p>Not relevant to planning application but inherent in guidelines.</p> <p>This relates more to the applications which will require detailed assessment by DWER.</p> <p>Application form is signed by landowner.</p> <p>Full details of the application were</p>	<p>Note.</p> <p>Note.</p> <p>Note, all information made available through consultation process.</p> <p>Note.</p> <p>Note.</p>

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		<ul style="list-style-type: none"> • Missing information on building locations, access and egress, hard stand and car parking areas, water licencing, traffic management, wash down facilities, landscaping, feed production and storage requirements. • Existing structures, proposed ancillary structures, watercourse locations, vegetation and location of springs on the property omitted. <p>Additional reports, diagrams and supporting information required:</p> <ul style="list-style-type: none"> • Engineering drawings for water and wastewater infrastructure; • Geotechnical and Hydrology studies and mapping as they apply to the site; • Management plans dealing with day to day operation; • Visual Impact Assessment; • Bushfire Management Plan • Environmental Impact Study; • Independent assessment from DPRID staff; • Certification that design complies with MLA guidelines; • Monitoring plans for water quality, air quality and pest management; • Details on environmental bonds to be taken – should be in the order of \$150,000 to deal with cover 	<p>published on the Shires website during the consultation period. Confidential information such as ownership details may not be advertised.</p> <p>Note the discussion of these issues in covering report and the recommended application of conditions where relevant.</p>	<p>Note discussion in covering report and recommended conditions related to landscape planting, certification of design and monitoring of water quality.</p>

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		<p>expense of remove or remediate waste.</p> <p>Number of misleading statements or issues with application to DWER (submitted as a part of the Planning Application);</p> <ul style="list-style-type: none"> • Applicants comment that all prescribed premises have been set out is inaccurate, does not include feed milling on the premise; • lack of authority for the applicant to act on behalf of the landowners; • Occupier status is not provided; • North points, effluent discharge points or land clearing not specified; • Omits grazing outside of feedlot and increase in dam size; • Discrepancy in the required feed to facilitate use; • Applicant does not disclose earlier applications made to DWER and previous non-compliance issues; • Clay volume to be excavated not sufficient and clay has not been assessed for sufficiency for pens; • Dam applied for is only half of required water, inconsistency between DWER and Planning Application; • Water licence application does not include other uses for the water, 	<p>Application includes feed milling. Applicant has had formed signed by landowner. The information described here is either within the application, has been confirmed through consultation with government agencies (such as the availability of water with DWER) or is required as a consequence of recommended conditions.</p>	<p>Note.</p>

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		<p>including truck, stock, and pen washdowns;</p> <ul style="list-style-type: none"> • No hydrology report provided to show dam catchment is sufficient to provide 12000 KL and not impact downstream users; • No detail of water infrastructure tanks provided. • Applicant has existing 11000kl bore extraction licence; • Details of water discharge and sewerage treatment within 150m of the of the evaporation pond omitted; • Noise from cattle omitted; • Details on stormwater treatment omitted; • Separation distances are incorrect; • Omission of farmhouses 200 & 350m from feedlot, as well as inclusion distance between the feedlot site and Treeton Road; • No detail provided relating to Acid Sulphate soils with dam excavation; • Ground water investigations occurred in summer at the 112m contour without substantial rainfall; • No investigation on ground water springs located between the 102 and 104m contour. • Clay tested near burial pit as opposed to dam which is the 		

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		<p>source of liner;</p> <ul style="list-style-type: none"> • Estimated cost of application considered too low given the amount of infrastructure required to facilitate use; • Applicant has not applied for discharge into land, air or waters; <p>Object to the 30-year term sought for the approval and the duration of the associated impacts. If considered a shorter term of approval is more appropriate.</p> <p>Contend that the cost of development and maintenance exceeds financial capacity of the applicant and development value has been understated by the applicant. Details of additional areas leased by the applicant should be provided to accompany the application.</p> <p>Water/Hydrology Impacts; Property of submitter vulnerable to downstream impacts and water contamination by feedlot. Property relies on dam located on downstream of feedlot. Soil report has not provided analysis of the feedlot area. Assessment of groundwater for the site is inaccurate, undertaken at the end of summer at a high point in a location different to the feedlot which did not analyse samples where clay was provided.</p>	<p>The development approval will be perpetual.</p> <p>No requirement for additional details of other land under lease. Any additional costs will need to be funded by the landowner or the development cannot be undertaken.</p> <p>See response to submitter 39 regarding Water/Hydrology Impacts.</p>	<p>Note.</p> <p>Note.</p> <p>Note.</p>

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		<p>Lack of analysis to demonstrate that the requisite amount of clay required is available at the dam site to line the feedlot pens;</p> <p>Estimate that 14 – 26ML water required for application, license application with DWER is for 12 which will be insufficient;</p> <p>Feedlot operations proposed are likely to like to result in significant damage to groundwater and surface water and result in environmental degradation as follows;</p> <ul style="list-style-type: none"> • Soil in the area is sandy with bands of clay; • Additional infrastructure being built will lead to an increase in dust and faecal matter, water from these structures will flow onto the land and discharge into water course being dangerous for the consumption by either stock or people; • Lack of evidence to determine if June rainfall would remove contamination from clay base for feedlot pens; • Contaminated water that penetrates the clay base of the pens will flow through the ground and hit clay bands and be directed back to the surface; • Water from cleaning the feedlots allowed to disperse into the paddock will eventually end up in 		

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		<p>the waterways;</p> <ul style="list-style-type: none"> • Amount of water required for the use will exceed recharge by winter rainfall and impact supplies downstream; • Cattle run on southern portion of site previously has resulted in water samples exceeding upper limit of nitrogen and nitrogen oxide with test performed by environmental consultant. Additional cattle will exacerbate this. • Submission does not consider roadworks required for draining the effluent pond, frequency of the drainage required will mean that this cost is high and may be a disincentive for this to be undertaken; • Proposal does not deal with accumulated material in the evaporation pond; • Proposal does not specify what will happen with the waste when removed from the site; • No containment system if the pond fails or leaks; • Lack of hydrologist or engineer report demonstrating the prevent nutrients entering the groundwater; • Discharge of spillway will be close to the Dam on property and could 		

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		<p>enter water course;</p> <ul style="list-style-type: none"> • Waste water onto the paddocks in winter is inappropriate as this will not evaporate, will mix with rains and enter watercourses. • Comments by applicant that water is at the 99m contour are not substantiated. • Evidence not provided of 11000kl water license for Location 1740 which can be transferred over to subject site. <p>Contend that a licence is required under the Country Areas Water Supply Act 1947 for land clearing in the Geographe catchment.</p> <p>Effluent Management; Impossible for front end loader to clean full extent of silt trap, and it is likely this could compromise the clay liner, likewise difficult to clean evaporation pond with surrounding bunding or provide access for sewerage truck;</p> <p>Lack of details around storage of removed material on the site (hardstands etc), could contaminate the ground is stored on ground;</p> <p>Conflicting comments made regarding the height of the freeboard;</p>	<p>See response to submitter 39 regarding Effluent Management.</p>	<p>Note.</p>

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		<p>Number of truck visits required to empty sediment pond will incur a significant cost and likely make this unfeasible;</p> <p>Collection once every 60 days will mean there will be a continual build up of solid waste accumulating at a rate of 3.5 tonnes per day; leaving considerable build up over a period of time,</p> <p>Comments that waste will be removed are impractical in the context of the scale of waste being generated. No details as to where the waste will be taken.</p> <p>Waste build up in the feedlot over summer will be converted to dust and be deposited over the nearby and adjoining paddocks, enter watercourses and contaminate water for downstream users;</p> <p>Contend storage of manure in windrows within pens would be impossible to be maintained as these can be trampled and interfered with by cattle.</p> <p>Contend dung beetles will not operate or exist in a feedlot environment due to being trampled and not being able to bury manure into soil (because of clay lining); Contend that the evaporation pond is undersized for the intended use;</p> <p>Feeding animals grain instead of grass</p>	<p>Cleaning frequency consistent with guidelines.</p>	<p>Note.</p>

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		<p>con increase odours associated with waste;</p> <p>Waste will result in high levels of nitrogen ammonia released into the environment in the form of ammonia and other volatiles;</p> <p>Conditions will likely result in the breeding of flies and spread of disease;</p> <p>Visual Amenity/Landscape Impacts, Concern about visual impact of the development on the landscape given location of the feedlot and cumulative impact of associated structures. No visual barrier proposed to address this impact. Contend that the visual impact will be within a 2km radius of the feedlot site, due in part to the large bunds required to level and accommodate sediment pond; 24hr operation proposed will require the installation of flood lights to allow working through the night; lighting the feedlot will have a significant visual impact on the area. Access areas, mill and hardstand required for storage will significantly increase the footprint of the use and lead to increased visual impacts. Consider that the proposal is inconsistent with the visual management policy requirements of the Local Planning Strategy given the location of the development on a prominent ridgeline</p>	<p>Note that complete visual mitigation is not required or intended. Some landscape planting would be appropriate to buffer the use.</p>	<p>Apply condition to mitigate visual impacts.</p>

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		<p>visible from Treeton Road. Development will detract from the rural character of the area.</p> <p>Land Use Conflict; Use considered to be inconsistent with objective for diverse array of uses in primary agriculture zone, noting numerous tourism uses within proximity to the site.</p> <p>History of Non-Compliance Non-conforming use right used as basis to justify the expanded operation when stock limits on the site have been consistently exceeded and environmental impacts have already occurred. Historic noncompliance with non-conforming use approval limitations. 400 head cattle limits exceeded 580 counted on most recent aerial imagery. Concern about lack of intervention from the Shire when noncompliance when non-compliance observed; Lack of action by DWER against pollution caused by feedlot. Consider that DWER should conduct the risk assessment for the lot as opposed to self-assessment by the applicant. Current compliance processes are ineffective in ensuring proposal operates in accordance with relevant approvals.</p> <p>Land Capability Content that the land does not have the</p>	<p>Note discussion on land use conflict, amenity and separation zones in report.</p> <p>New proposal and conditions provide the opportunity to provide a clear measurable baseline for operations.</p> <p>Note intent to limit stocking rates. See DPIRD comments regarding</p>	<p>Note.</p> <p>Note.</p> <p>Apply conditions in relation to stocking</p>

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		<p>capacity for more than 400 cattle; Query the Dry Sheep Equivalent value applied by the applicant - direct DSE value applied without additional values applied for Sheep.</p> <p>Content that stocking rates for the site would result in between 150 – 225 animal limit for the site.</p> <p>Operational Considerations Concerns requisite staffing will not be provided to manage the scale of the operation and monitor key operational aspects of the use. Lack of operational procedures provided as a part of the application. Use will need 14 – 17 tons of feed, lack of detail provided in respect to storage related infrastructure for such large quantities of feed.</p> <p>Odour Large combined surface area of the silt trap and sediment pond will smell; Position of feedlot at the crown of a hill will mean that odour produced will spread to surrounding properties with various wind directions;</p> <p>Local Planning Scheme Assessment Note that feedlots are not a use that can occur as of right within the agricultural zone and requires the special approval of</p>	<p>stocking rates.</p> <p>The applicant has provided details regarding operational aspects that are detailed in the covering report.</p> <p>See response to submitter 37 regarding odour.</p> <p>Refer to planning comment section of the report.</p>	<p>rates outside pens.</p> <p>Note.</p> <p>Note.</p> <p>Note.</p>

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		<p>council.</p> <p>Proposal required to meet 100m setback requirement to water course.</p> <p>No qualification provided on water supply in accordance with 4.16.1(e). consider that the application is deficient given the lack of a water licence or hydrological report;</p> <p>Contend that Treeton Road is a travel route corridor in accordance with the Scheme and requires a 60m setback to be observed from the Treeton Road boundary. Current mill location does not adhere to this requirement.</p> <p>Lack of detail provided in respect to landscape treatment. Landscaping should be incorporated to reduce visual impacts of buildings, parking areas and open storage areas.</p> <p>Lack of detail provided to confirm structures proposed adhere to the 11m height limit.</p> <p>Consider that the development is 'inappropriate or incongruous' as set out by clause 5.14 of the Scheme due to insufficient supporting information provided with the proposal.</p> <p>Proposal does not meet clause 5.21.1</p>	<p>Proposal is setback more than 100m from a watercourse.</p> <p>DWER has confirmed the availability of water for the proposal.</p> <p>Treeton Road is not a travel route corridor under LPS1.</p> <p>Landscaping is important to address visual amenity.</p> <p>All structures meet the height limit.</p> <p>This is not the intent of this provision.</p> <p>Satisfactory measures are included to address any impacts on</p>	<p>Note</p> <p>Note.</p> <p>Note.</p> <p>Landscaping to be required.</p> <p>Note.</p> <p>Note.</p> <p>Note.</p>

SCHEDULE OF SUBMISSIONS – P219421
Animal Husbandry (Feedlot) – Amended Application
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		<p>regarding watercourse protection. Existing use has impacted watercourses on adjoining sites which will be exacerbated by expansion. Lack of detail on other sources of contaminated water sources such as wash down areas and lack of verification the designs withstand the quantities of effluent produced.</p> <p>Question current non-conforming use rights for the properties and ongoing non-compliance with the conditions applied to the non-confirming use including exceeding stock limits, non-compliance with the MLA guidelines, contamination of water watercourses and odour emissions.</p> <p>Application should be referred to the Department of Water and Environmental Regulation, Main Roads and Department of Primary Industries and Regional Development. Contend the relevant personnel at the Department of Primary Industries and Regional Development have not been provided the application for comment.</p> <p>Concern that the scheme does not contain specific provisions relative to animal husbandry, assessing the use against intensive agricultural requirements does not recognise the industrial scale of the use.</p>	<p>waterways.</p> <p>The issue of potential non-conforming use rights is detailed in the covering report.</p> <p>Application has been referred to relevant government agencies.</p> <p>The proposal has been assessed against relevant guidelines and codes of practice.</p> <p>The use falls within the definition of</p>	<p>Note.</p> <p>Note.</p> <p>Note.</p> <p>Note.</p>

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		<p>would constitute sewerage for the purposes of the Shire of Augusta Margaret River Health Local Laws. Based on this, considered that the method of effluent disposal is prohibited as it is not discharged to an authorised place, depot, operator or an authorised apparatus.</p> <p>The use will not comply with section 53 which prohibits dust, liquid waste and offensive odours into the environment.</p> <p>Applicants proposal does not include wash down areas for transport vehicles and associated disposal which is required in the Health Local Laws;</p> <p>The health local laws require pens to be kept free of excreta, disinfected and kept free from flies, need to be appropriately drained, have cement floors with a slope of 1:100 and 75mm above ngl. Pen slope design exceeds 3 degrees;</p> <p>Comparison made between rules for piggeries in the Health Local Law, which are to be no closer than 1000m of any isolated rural dwellings and 5km to townsite boundaries.</p> <p>Measures not outlined to deal with the control of flies as per section 90 and 97 of the Health Local Law;</p>	<p>relevant to this proposal.</p>	

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		<p>under assessment by the Department.</p> <p>A number of further points of clarification are being sought by DWER in consideration of the work approval application.</p>	Noted.	Note.
b.	Department of Primary Industries and Regional Development (DPIRD)	<p>DPIRD does not object to the feedlot at the abovementioned lot. DPIRD would like to provide the following comments:</p> <ul style="list-style-type: none"> • The required separation distances to sensitive receptors using the s-factor calculation in the National Guidelines for Beef Cattle Feedlots in Australia (MLA 2012) is only just achieved. • In Section 3: Effluent Evaporation Pond, there is reference to a 2m freeboard and in Section 4 there is reference to a 1.5m freeboard. A 0.2m freeboard for a pond that is 2.1 m deep would mean the actual depth is only 0.1 m. The National Guidelines for Beef Cattle Feedlots in Australia (MLA, 2012) recommends a freeboard of 0.9m. Water Quality Protection Note 27 (Department of Water, August 2013) recommends that the underside of the lowest liner should be at least 2m above the highest wet season water table. Clarification is therefore required on this point. • Based on the descriptions provided in the works approval application and the 	<p>Noted.</p> <p>Noted, some redesign and clarification over pond size has been provided by the applicant, however, greater scrutiny will be undertaken by DWER in the assessment of pond function.</p> <p>Noted. The earthworks requirements have been confirmed with the</p>	<p>Incorporate revised plans and further apply conditions that modifications may be required to reflect DWER required amendments.</p> <p>Noted.</p>

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		<p>slope of the land, to achieve the desired slopes of 3 degrees towards the central raceway there would need to be significant earthworks to build up the level of the southern row of pens. The application does not address this issue, nor is there a north to south cross-sectional diagram to demonstrate how the 3 degree slope is to be achieved for the southern row of pens.</p> <ul style="list-style-type: none"> • Based on the contours of the site shown on the Site Plan, there is the potential for fresh water to enter the controlled drainage area from upslope of the feedlot. This may require the construction of diversion drains to carry freshwater away from the feedlot site. • The issue of the stocking rate of cattle in paddocks grazing stubbles and pastures requires some clarification. <ul style="list-style-type: none"> a) Are the 1000 acres all arable? Only arable areas should be used for calculations. b) If the allowable stocking rate is calculated as one 200kg animal for every acre, therefore 850 head will need 850 acres. This will only allow (if all acres are arable) 150 acres to be cropped - will this generate enough stubbles to sustain the 400kg animals in paddocks from December to May 	<p>applicant who acknowledges the extent required. The scale of the landscape modification is not out of keeping with other activities in the Priority Agriculture zone.</p> <p>The applicant has advised that a 0.9m bund will be put in place around the feedlot to diver stormwater.</p> <p>Noted, actual use is confined to the site itself and should be limited to sustainable rates.</p>	<p>Note revised drawings and stormwater diversion.</p> <p>Conditions have been recommended to address stocking rates in surrounding paddocks.</p>

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		<p>or will these animals be relying primarily on supplementary feeding?</p> <p>c) What is the average weight in and weight out of the 200kg animals that are in paddocks? The average weight of these animals at the midpoint of their time in paddocks should be used when determining their DSE value, which could alter the stocking rate (e.g. - if they enter the paddocks at 200kg and are moved into the feedlot when they are 400 kg, then the average weight of 300 kg should be used to determine their DSE value).</p> <ul style="list-style-type: none"> • There are inconsistencies in the Drainage System and Effluent Evaporation Pond sections that relates to the design and function of the silt trap and evaporation pond. There is also no north-south cross sectional diagram to demonstrate the design and function of this infrastructure. Additional clarification would be required for assessment to take place. • Covered area in the cattle yards - the pond size calculation based on the controlled drainage area assumed that fresh water from this covered area would be diverted outside of the controlled drainage area. There is no evidence of how this is to occur. The 	<p>Further clarification and drawings have been provided in response to this comment.</p> <p>The applicant has confirmed that the intent is for this water to runoff into the central raceway.</p>	

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		location of the covered area appears to be at the top of the drain, with water from the holding pens draining into and through this covered area.		