



CURRAJONG
PLANNING, PROPERTY + PROJECT MANAGEMENT

Statement of Environmental Effects

Alterations and Additions to the Manildra Group Grain Handling Facility (new silos and loading equipment) on Lot 420 DP 1059026, 1802 Newell Highway, Grong Grong

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1. INTRODUCTION

1.1. Scope

This Statement of Environmental Effects (SEE) has been prepared by Currajong Pty Ltd (Currajong) on behalf of the Manildra Group, the owner / operator of the Manildra Group Grain Handling Facility at Lot 420 DP 1059026, 1802 Newell Highway, Grong Grong.

This SEE document has been prepared to accompany a Development Application (DA) for the proposed erection of 2 x 3,633 tonne storage silos, drag conveyors, sweep augers and gates to provide larger storage capacity and improved distribution of grain to the existing rail siding network located at the Grong Grong site.

1.2. Overview

The proposed development represents alterations and additions to an existing grain handling facility established by the Australian Wheat Board (AWB) in accordance with Development Consent No. DA46-02/03 granted by Narrandera Shire Council on 13 December 2002 and as amended by DA34-07/08 granted by Narrandera Shire Council on 14 December 2007.

As per the approved plans and consent documentation, the Manildra Group Grain Handling Facility at Lot 420 DP 1059026, 1802 Newell Highway, Grong Grong is authorised to store up to 270,000 tonnes of grain. Road and rail network facilities built for the grain handling facility during the period 2003 to 2006 are robust and accommodate all traffic generated to and from the facility during peak harvest periods, via the Newell Highway and Nullong Road intersection.

The Manildra Group purchased the Grong Grong Grain Handling Facility in 2021 and have managed the facility through the 2021-22 harvest, which was the largest on record in the region.

To improve grain handling operations onto railway trucks at the Grong Grong Grain Handling Facility, the Manildra Group is proposing new storage silos and rail loaded facilities as follows:

- Elevated metal grain storage silos, 2 x 3,633 tonnes.
- Drag conveyors.
- Sweep augers.
- Access control gates.

The development does not include any changes to existing approved storage limits, hours of operation, truck haulage trips, vehicle manoeuvring or general unloading arrangements from trucks. Loading arrangements onto trains will be slightly altered with the new works providing the Manildra Group with greater capacity to load trains with grain more efficiently.

TfNSW have provide written comments on the proposed alterations and additions dated 2 June 2023 which advises a Traffic Impact Assessment is not required.

1.3. Application particulars

Applicant	Manildra Group
Site	Lot 420 DP 1059026, 1802 Newell Highway, Grong Grong
Proposal	Alterations and additions to existing agricultural produce facility (2 x new grain silos and train loading conveyor system)
Estimated capital cost	\$3,031,942.10 (including GST)
Zoning	RU4 Primary Production Small Lots under Narrandera Local Environmental Plan 2013
Consent Authority	Narrandera Shire Council

1.4. Approvals required

The proposal requires development consent under Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act).

The proposal does not trigger 'designated development' pursuant to Part 2 of Schedule 3 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation) because the development involves no crushing, juicing, grinding, ginning, milling, separating, washing, sorting, coating, rolling, pressing, steaming, flaking, combing, homogenising and pasteurising of grain materials received at the site.

The proposal does not trigger 'regionally significant development' because it is not designated development and has a capital investment value of less than \$30 million.

The proposal does not trigger 'integrated development' because it does not require any approvals under any legislation listed under Section 4.46 of the EP&A Act.

The proposal does not trigger the Biodiversity Offsets Scheme (BOS) threshold because it does not involve any clearing of native vegetation.

In accordance with Part 4 of the EP&A Act a Development Application is to be lodged with Narrandera Shire Council, along with a Statement of Environmental Effects (this report) and various plans in support of the proposed alterations and additions at the Manildra Group Grong Grong Grain Handling Facility.

1.5. Format of the report

The information presented in this SEE covers all aspects of the proposal as specified under the Environmental Planning and Assessment Regulation 2021.

The SEE has been prepared as a single document of several sections as follows:

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

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

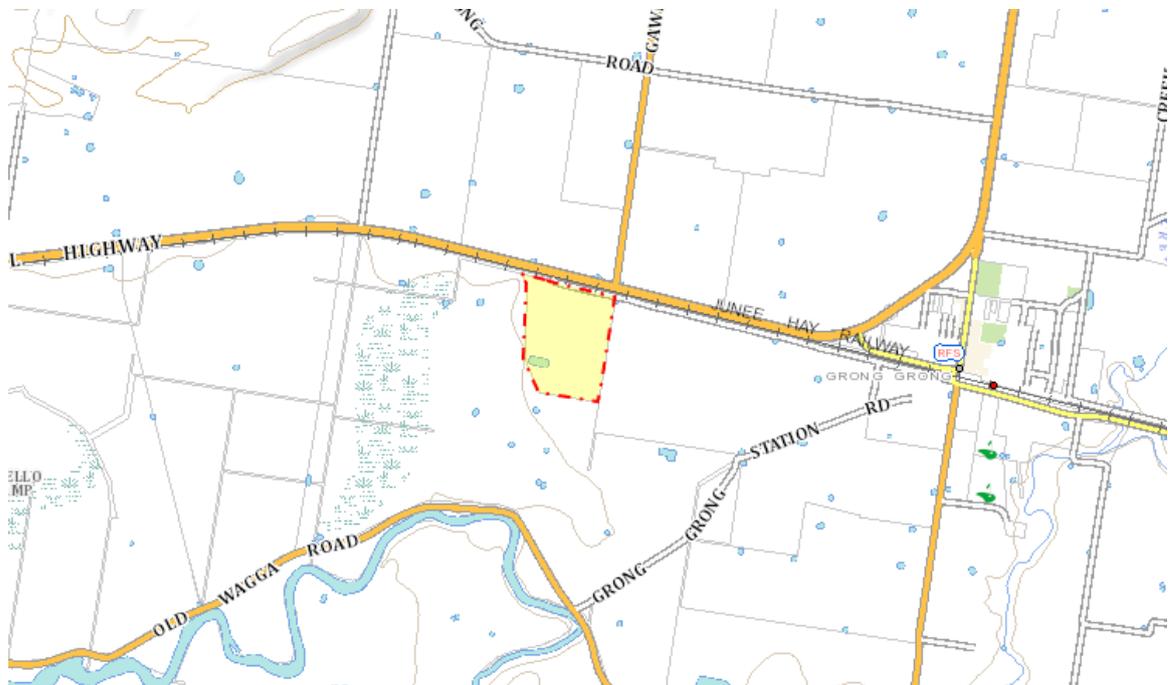
Attachment 1	Currajong Grong Grong Grain Handling Facility Site Plan, dated April 2023
Attachment 2	Allied Grain Drawing Q1836-GA-001, dated 3 February 2023
Attachment 3	Allied Grain Systems Commercial Quote for supply and installation of new silos and loading equipment, dated 22 February 2023
Attachment 4	TfNSW letter, dated 2 June 2023
Attachment 5	Narrandera Shire Council Development Consent No. 46-02/03, dated 13 December 2002
Attachment 6	North West Environmental Services letter clarifying operation capacity objectives, dated 5 November 2002
Attachment 7	Narrandera Shire Council Development Consent No. 34-07/08, dated 14 December 2007
Attachment 8	AWB Grong Grong Statement of Environmental Effects, dated September 2007

2. DEVELOPMENT SITE DESCRIPTION

2.1. Site location

The existing grain handling facility is located in the Narrandera Shire, approximately 3.5km west of Grong Grong. The site has access to Nullong Road and then onto the Newell Highway, which is a State road managed by TfNSW. The Junee Hay Railway line is located immediately to the north of the site, with the subject land containing a rail siding for loading of grain products. A map showing the location of the site, highlighted in yellow with a red outline is shown in Figure 1.

Figure 1 – Site Location Plan



Source: Sixmaps

The existing grain handling facility is located on Lot 420 DP 1059026, 1802 Newell Highway, Grong Grong. The site has access to Nullong Road and then onto the Newell Highway, which is located to the north of the site.

2.2. Description of zoning

The site of the Manildra Group Grain Handling Facility at Grong Grong is zoned RU4 Primary Production Small Lots under the Narrandera Local Environmental Plan 2013. Surrounding land to the east, south and west is similarly zoned RU4 Primary Production Small Lots. Land to the north is zoned RU1 Primary Production.

2.3. Description of surrounding land-use

The Manildra Group Grain Handling Facility at Grong Grong is generally surrounded by rural land comprising broadacre farming paddocks, native vegetation and regrowth vegetation. The Newell Highway and Junee Hay Railway Line directly adjoins the grain handling facility. There are no watercourses within proximity of the site. Bundidgerry Creek is located 1.2 kilometres south of the site. The nearest residence to the site is located approximately 550 metres to the south.

including robust road intersection and access treatments, railway loop and loading facilities, stormwater management facilities and staff amenities.

A detailed breakdown of works already approved / constructed on the site are as follows:

- Ground level bunker storages comprising compacted crushed rock with 1.2m high perimeter walls with capacity to store 160,000 tonnes of grain.
- 2 x 1,350 tonne elevated metal grain storage silos.
- 1 x 25 tonne capacity in ground receival hopper.
- 1 x 1,000 tonne per hour bucket elevator comprising support tower, access ladders and platforms for receiving, recirculating, and out-loading product to the bunker storage.
- 1 x 1,000 tonne per hour belt conveyors for rail out-loading.
- 400 tph belt conveyor system with dual stacker / trippers for in-loading and out-loading product to the bunker storage.
- 1 x 100 tonne elevated surge bin to provide variable receival capacity to the bunker flow path.
- Miscellaneous buildings including 2 x site offices, sample platform and workshop.
- Onsite wastewater management systems installed next to existing site offices (for staff) and near the sampling stand (for truck drivers).
- Weighbridge capable of handling a 36.5m road train.
- Associated earthworks, roadworks and drainage.
- Onsite rail siding and highspeed turnout intersection with the Junee Hay Railway.
- Internal road design (including adequate truck queuing areas) and road intersection treatments to The Newell Highway.
- Existing topsoil borrow pits and supporting stormwater drainage detention basins.

Photographs of existing facilities on the site are as follows:

Photograph 1 – Grain Facility Site Entrance



Photograph 2 – Grain Handling Facility Automated Sample Stand



Photograph 3 – Grain Handling Facility Sampling Stand and Public Toilet



Photograph 4 – Grain Handling Facility Weighbridge, Office and Workshop



Photograph 5 – Grain Handling Facility Workshop and Water Tanks



Photograph 6 – Grain Handling Facility Rail Loading Facility



Photograph 7 – Grain Handling Facility Rail Loading Hopper



Photograph 8 – Grain Handling Facility Water Storage (south of grain storage facility)



3.2. Description of approved grain handling and storage operations

The existing grain handling facilities at the Manildra Group Grong Grong Grain Handling Facility were all approved under Development Consents No. DA46-02/03 and DA34-07/08 granted by Narrandera Shire Council. These consents authorise large-scale receipt and storage of grain up to 270,000 tonnes per year. Copies of Development Consent No. DA46-02/03 and DA34-07/08 are separately attached to this report.

Since the commencement of use of the Grong Grong Grain Handling Facility in 2002, the facility has handled 18 harvests with an estimated throughput of close to 3 million tonnes of grain.

Grain receipt is primarily via road during the grain harvest season, which generally spans a 10-week period between October and January each year. Through this period, a peak of up to 5,000 tonnes per day can be received at the facility, distributed over a period of up to 16 hours per day. Dispatch of grain is designed largely via rail and generally occurs steadily throughout the year.

The Manildra Group purchased the Grong Grong Grain Handling Facility in 2021 and managed the facility during the 2021-22 harvest, which was the largest on record according to ABARES at 61.9 million tonnes throughout Australia. In that harvest, the Manildra Group Narrandera Grain Handling Facility received a record 140,000 tonnes of grain during the period beginning in November to the end of January, all of which was transported to Narrandera or Nowra Flour Mills by rail for processing.

3.3. Description of approved transport operations

Similar to other grain handling facilities in the region, the Manildra Group Grain Handling Facility at Grong Grong is operated on a seasonal basis, whereby the majority of activity is conducted for several weeks during harvest primarily involving truck receipt and unloading operations, followed by limited activity for several months other than product storage, train loading and transport and general maintenance of the site.

Road access to the site continues via internal access roads connecting to Nullong Road, which is a bitumen sealed local road, immediately south of the Newell Highway. Access onto the State highway network is provided via an existing auxiliary left-hand turn (AUL) and channelised right-hand turn lane (CHR) intersection of Nullong Road and the Newell Highway, which was constructed as part of grain handling facility issued with an Occupation Certificate on 10 April 2006. Upgrades to Nullong Road and the railway crossing of the Junee Hay Railway Line were also completed as part of approved works.

Receipts by road occur primarily during the grain harvest season, which generally spans a 10-week period between October and January each year. Through this period, a peak of up to 5,000 tonnes per day can be received at the facility, distributed over a period of up to 16 hours per day. Most trucks accessing the facility have large carrying capacities, such as semi-trailers, B-doubles and Road Trains.

Dispatch of grain continues largely via rail, which is the most efficient method of haulage to either Narrandera or Nowra Flour Mills owned and operated by the Manildra Group. A maximum of two (2) trains per week are received at the Grong Grong facility, with all grain transported by rail by a contracted rail service provider (currently Pacific National) to either Narrandera or Nowra Flour Mills.

4. PROPOSAL DESCRIPTION

4.1. Overview of the proposal

The proposal seeks to obtain consent for alterations and additions to the Manildra Group Grain Handling Facility at Grong Grong to allow for improvements to rail truck loading facilities located on the site. The proposed works involve the construction of 2 x 3,633 tonne grain silos with ancillary conveyors and augers at the general location of existing rail loading facilities. The new silos, conveyors and augers will feed into the existing silos and hopper which are used to load rail trucks. The new works will improve efficiencies associated with the loading of haulage trains. No changes to road truck trips, unloading facilities for road trucks, onsite storages or amenities are proposed.

4.2. Description of proposed rail storage and loading facilities

The development proposes 2 x elevated metal grain silos with the following specifications:

- Volume: 4,439 cubic metres.
- Capacity: 3,633 tonnes of wheat @ 833 kg/m³ and 6% compaction.
- Diameter: 18.29 metres.
- Eave Height: 15.44 metres.
- Overall height: 20.68 metres.
- Peak roof capacity: 13,590 kg (raftered roof).
- Materials: Galvanized corrugated side wall sheeting.
- Roof: 30-degree pitch.

In addition to the new silos, 2 conveyers (approximately 20 metres long) will be installed over the top of the silos and connecting to the existing rail conveyor and loading system. Augers and security gates will also be provided for operational and safety purposes.

The Currajong Site Plan dated April 2023 and the Allied Grain Systems Drawing Q1836-GA-001 show the extent of proposed development works. The proposed new metal grain silos, drag conveyors, sweep augers and gates will be located to the west of the existing grain bunkers, adjacent to the existing grain silos and tower adjoining the onsite rail siding. The siting of the new structures will ensure there are no changes to internal truck haulage and unloading operations. Similarly, there will be no changes to site access locations onto public roads or grain storage operations at bunker storages. No new amenities or other facilities are required to be changed to accommodate the proposed railway loading upgrades.

The grain silos will provide additional storage for loading into trains for distribution to the regional flour mills owned and operated by the Manildra Group. The grain receipt, storage, distribution and flour mill processing operations are a 'closed loop system' that is highly dependent on rail to moving bulk grain volumes out of the Grong Grong site.

4.3. Need for the project

According to the Federal Government Department of Agriculture, Water and the Environment, total winter crop production in NSW is forecast to reach 14.7 million tonnes in 2022–23, 33% above the 10-year average to 2021–22. Summer crop production in NSW is also estimated to increase by 73% in 2021–22 to 2.9 million tonnes, 46% above the 10-year average to 2020 - 21.

Grong Grong is located towards the centre of southern NSW, which is highly conducive to producing large crops given the land is relatively flat and temperatures are warm. Irrigation is also established in the region which provides some extra flexibilities and securities in the growing of crops. The region is capable of producing large volume crops of wheat, oats, barley and canola. Other common crops include triticale and pulse crops such as lupins and field peas for food and stock feed.

The Manildra Group have identified a need to improve operational efficiencies at their Grong Grong Grain Handling Facility to allow the company to handle expected increased crop production in the sub-region and to meet growing demand for grain at their Manildra, Narrandera and Nowra Flour Mills. The proposal would enable the Manildra Group to load grain on rail trucks for transport by rail to flour mills in a more efficient manner.

Once the proposed silos and loading facilities are installed, the Manildra Group Grong Grong Grain Handling Facility will continue to operate as existing. No changes to grain receival facilities / operations are proposed, which have proven to be robust in accommodating truck and rail traffic from the surrounding sub-region.

5. PLANNING AND LEGISLATIVE CONTEXT

5.1. Introduction

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

5.2. Commonwealth legislation

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

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

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

5.3. New South Wales legislation

5.3.1. [Environmental Planning and Assessment Act 1979](#)

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

- a. to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,
- b. to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,
- c. to promote the orderly and economic use and development of land,
- d. to promote the delivery and maintenance of affordable housing,
- e. to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,

- f. to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),
- g. to promote good design and amenity of the built environment,
- h. to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,
- i. to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,
- j. to provide increased opportunity for community participation in environmental planning and assessment.

Under the EP&A Act, local councils prepare Local Environment Plan (LEPs) that specify planning controls for specific parcels of land. The EP&A Act also provides for State Environmental Planning Policies (SEPPs) and Regional Environmental Plans (REPs). Applicable environmental planning instruments are discussed in later parts of this SEE. In general, development consent is required for the proposed alterations and additions to an agricultural produce industry, pursuant to the Narrandera Local Environmental Plan 2013.

5.3.2. Local Government Act 1993

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

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

Approvals have already been granted for the installation and operation of onsite wastewater management systems on the site by Narrandera Shire Council. No new local government approvals are required.

5.3.3. Heritage Act 1977

The Heritage Act 1977 provides for the conservation of environmental heritage defined as places, buildings, works, relics, moveable objects, and precincts, of State or local heritage significance which are at least 50 years old. The Act applies to non-Aboriginal relics only, as Aboriginal relics are protected under the National Parks and Wildlife Act 1974.

The subject site is not listed on the State Heritage Register and an approval from Heritage NSW is not required under the Heritage Act 1977. The site is also not listed as a Heritage Item under the Narrandera Local Environmental Plan 2013.

Heritage issues are assessed under Section 6 of this report. In general, no heritage issues / impacts have been assessed to apply, and an approval under the Heritage Act 1977 is not required to be obtained for the proposal.

5.3.4. National Parks and Wildlife Act 1974

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

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

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

The site largely comprises 'disturbed land' used for storing / distributing grain and farmland, as defined under The National Parks and Wildlife Regulation 2019 (NPW Regulation). Aboriginal cultural heritage issues are assessed under Section 6 of this SEE. In general, no threatened species or Aboriginal issues / impacts have been assessed to apply, and an approval under the NPW Act is not required to be obtained for the proposed additions to the agricultural produce industry.

5.3.5. Biodiversity Conservation Act 2016

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

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

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

5.3.6. Roads Act 2016

Under Section 138 of the Roads Act 1993 a person must not erect a structure or carry out a work in, on or over a public road, or dig up or disturb the surface of a public road, otherwise than with the consent of the appropriate road authority. No new accesses or road works are required to accommodate the proposal and an approval under the Roads Act 1993 is not required to be obtained.

5.3.7. Protection of the Environment Operations Act 1997

The Protection of the Environment Operations Act 1997 (POEO Act) regulates air, noise, land and water pollution. The existing grain handling facility does not operate under an Environment Protection Licence (EPL) and Narrandera Shire Council is the Appropriate Regulatory Authority (ARA) for general pollution control matters in the Narrandera LGA. The grain handling facility is not a Scheduled Activity as defined in Schedule 1 of the POEO Act. No licence approvals are required.

5.3.8. Work Health and Safety Act 2011

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

5.3.9. Waste Management Act 2000

The objective of the Water Management Act 2000 (WM Act) is the sustainable and integrated management of the State's water sources for the benefit of both present and future generations by applying the principles of ecologically sustainable development to protect, enhance and restore water sources and their associated ecosystems, ecological processes and biological diversity and their water quality. The objectives of the Act were considered throughout the planning and design phases of this development and as detailed in this SEE. No ground penetrations are proposed and therefore the development will not intercept groundwater. Water impacts are addressed in Section 6 of this SEE. In general, no specific approvals are required under the WM Act. In general, no specific approvals are required under the WM Act.

5.3.10. Water Management Act 2000

The proposal is unlikely to intercept groundwater and any sediment basin and residual water storage structures will be within the maximum harvestable rights for the site. Water impacts are addressed in Section 6 of this SEE. In general, no specific approvals are required under the Water Management Act.

5.3.11. Rural Fires Act 1997

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

5.3.12. Noxious Weeds Act 1993

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

5.3.13. Contaminated Land Management Act 1997

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

5.4. State Environmental Planning Policies (SEPP)

5.4.1. SEPP – Planning Systems 2021

The Planning Systems SEPP identifies significant development and infrastructure and confer functions on Regional Planning Panels to determine development applications. The proposal is not classified as State Significant Development or Regional Development and will be assessed and determined by Narrandera Shire Council as local development.

5.4.2. SEPP – Biodiversity and Conservation 2021

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

5.4.3. SEPP - Primary Production 2021

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

5.4.4. SEPP – Transport and Infrastructure 2021

The Transport and Infrastructure SEPP provides a consistent planning regime for infrastructure and the provision of services and public works across NSW, along with providing for consultation with relevant public authorities during the development assessment process.

The proposal involves minor additional storage of grain (2x 3,633 tonne silos). Approval has already been granted by Narrandera Shire Council for storage of up to 270,000 tonnes per annum. This storage capacity has never been exceeded and annual grain receipt at the grain handling facility averages around 140,000 tonnes.

The proposal is to improve the efficiency of rail loading activities only, which are all conducted off the Junee to Hay Railway. Completion of road access, intersection, railway crossing, and signage upgrades were all completed in accordance with the conditions of Development Consents No. 46-02/03 and 34-07/08 and an Occupation Certificate has been issued on 10 April 2006.

Section 2.48 of the SEPP requires consideration of electricity supply requirements, where the development is:

- Within or immediately adjacent to an easement for electricity purposes (whether or not the electricity infrastructure exists).
- Immediately adjacent to an electricity substation.
- Within 5m of an overhead power line.
- Includes installation of a swimming pool any part of which is within 30m of a structure supporting an overhead electricity transmission line and / or within 5m of an overhead electricity power line.
- Placement of power lines underground.

There are no overhead powerlines near the proposed silos and there are no aspects of the development proposal that impacts on electricity supply services, as per SEPP requirements.

5.4.5. SEPP – Exempt and Complying Development Codes 2008

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

5.4.6. SEPP – Resilience and Hazards 2021

This SEPP requires that a consent authority must consider the contamination potential of the land, and if the land is contaminated, it is satisfied that the land is suitable for the development in its contaminated state, or that appropriate arrangements have been made to remediate the site prior to the development being carried out.

The site has been used as a grain handling facility for many years. There are no known fuel storages located on the site. Small quantities of fuels, oils, greases and chemicals may have been brought to the site for site / plant maintenance.

Visual inspection of the site does not reveal any evidence of contamination of chemicals, fuels or waste dumps. A search of the NSW contaminated land register does not show the site as contaminated land. It is not proposed to change the use of the site and the grain handling facility will continue to operate within the confines of the site and involve modern work practices that should not increase current contamination risk at the site or adjoining lands.

Based on existing operations, the site is considered suitable for the proposed alterations and additions. No further investigations / actions are considered necessary.

5.5. Local Environmental Plans

5.5.1. Narrandera Local Environmental Plan 2013

The Narrandera Local Environmental Plan 2013 (NLEP) applies to all land within the Narrandera Local Government Area. The site of the proposed development is zoned RU4 Primary Production Small Lots under the NLEP. The Manildra Group Grain Handling Facility is defined as ‘agricultural produce industry’ under the NLEP, as follows:

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

Agricultural produce industries are permitted within the RU4 Primary Production Small Lots zone with development consent. The objectives of the zone RU4 Primary Production Small Lots are:

- To enable sustainable primary industry and other compatible land uses.
- To encourage and promote diversity and employment opportunities in relation to primary industry enterprises, particularly those that require smaller lots or that are more intensive in nature.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.

The proposed development is for additional grain storage silos and supporting equipment at an existing agricultural produce industry (grain handling facility). The proposal is permissible with consent on land zoned RU4 Primary Production Small Lots with consent. The proposal will improve the viability of the Grong Grong Grain Handling Facility and contribute / support general employment in the area on farms and at the grain handling facility. The proposal has been carefully designed to respond to existing site conditions,

adjoining land-use and the natural resources of the area. The proposal is not considered to conflict with the adjoining land-uses, roads, railways or other resource assets based on the assessments undertaken as part of this SEE. The nearest residence to the site is located approximately 550 metres to the south. The proposed development is therefore considered to be both compatible and consistent with the surrounding land-uses and meets the objectives of the RU4 Primary Production Small Lots zone.

A number of special provisions under the NLEP apply to the proposal. An assessment of the proposal against the relevant provisions of the NLEP is provided below:

Clause 2.6 Subdivision consent requirements

The grain handling facility is located wholly on Lot 420 DP 1059026. It is not necessary to undertake any subdivision of the land and Clause 2.6 does not apply.

Clause 5.11 Bush fire hazard reduction

The Grong Grong Grain Handling Facility is not located on land that is mapped as bush fire prone land. In general, no specific impact mitigation or approvals are required under the RF Act to manage bushfire risk. The Manildra Group have adopted emergency management plans, including emergency response to dealing with fires. This is discussed further in Section 6 of this report.

Clause 6.1 Earthworks

The proposed development will not involve any substantial earthworks given the silo's will be located adjacent to the existing silos, grain bunkers and internal manoeuvring roads which have previously been levelled and improved with compacted gravel hardstands and concrete surfaces. Soils and water quality impacts are addressed in Section 6 of this report. In general, no significant implications on environmental functions and processes, neighbouring uses, cultural or heritage items, drainage patterns, existing vegetation or other features of the surrounding land have been identified that can't be addressed through mitigating potential impacts.

Clause 6.4 Terrestrial Biodiversity

Part of the Grong Grong Grain Handling Facility is located on land that is mapped as 'biodiversity' on the Natural Resource – Biodiversity Map of NLEP. The proposed works will not be undertaken on cleared land next to an existing rail siding loop. No vegetation is proposed to be removed as a result of the proposed development. Section 6 of this report provides an assessment of potential biodiversity impacts of the proposal. In general, no significant impacts are assessed on biodiversity values given the proposal involves works on cleared hardstands approved under DA46-02/03 and DA34-07/08 that are devoid of native vegetation.

Clause 6.5 Groundwater Vulnerability

The Grong Grong Grain Handling Facility is located on land that is mapped as 'groundwater vulnerable' on the Natural Resource – Groundwater Vulnerable Land Map of NLEP. The proposed works will be located on the northern extent of the identified area, adjacent to the existing rail siding, grain storage bunkers, silos and haulage roads. No groundwater extraction or discharging of waste is proposed as a result of the proposed development. Section 6 of this report provides an assessment of groundwater and soil impacts of the proposal. In general, no significant impacts are assessed on the groundwater resource given the proposal involves works and building footprints already approved under DA46-02/03 and DA34-07/08 and the new silos and equipment will be on cleared land that is currently used for haulage movements and storage of grain.

Clause 6.13 Essential services

The existing grain handling facility is established with connections to power, telecommunications and transport infrastructure. No upgrades to existing accesses, public roads, water supplies, sewage management systems, amenities and the like are required to accommodate the proposal.

5.6. Development control plans

The Narrandera Control Plan 2013 (DCP) applies to the development site. There are no specific provisions relating to grain handling facilities in the RU4 Primary Production Small Lots.

5.7. Contributions plans

The Narrandera Shire Council Section 94A Development Contributions Plan 2014 applies to new developments within the Narrandera Local Government area that are not subject to an exemption under Section 2.5 of the plan.

The proposed development has a capital investment value that will require the payment of a contribution as a condition of consent.

6. ASSESSMENT OF ENVIRONMENTAL ISSUES

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

6.1. Visual impacts and amenity

6.1.1. Introduction

The proposal will lead to minor changes in the rural landscape to a certain extent, with the collocation of new silos and equipment with existing elevated silos located on the site.

6.1.2. Assessment of existing condition

The site sits within a context of a rural land-use west of Grong Grong and south of the Newell Highway. The site has an area of approximately 92.04 hectares and comprises existing grain receipt and storage facilities as well as associated road and railway infrastructure, loading facilities, offices and amenity buildings and other structures. The site is zoned RU4 Primary Production Small Lots and is surrounded by broadacre farming properties on all sides. Views of the site are available from nearby farms, public roads and railways. The site contains existing grain bunkers and elevated grain silos typical of grain handling facilities in the region.

6.1.3. Assessment of potential impact

The proposed development will result in two additional metal grain silos, approximately 21.8 metres high by 18 metres in width. The structures will be located adjacent to two existing grain silos and a centralised tower with grain storage bunkers to the west. The new silos will be of a similar height to existing silo structures. The grouping of the grain silos at their proposed location and the distances from surrounding roads, railways and farms will help to minimise any visual impacts as viewed off-site. The grain silos will be located on previously levelled hardstands and will not require any substantial changes to the landform.

6.1.4. Management and mitigation

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

6.2. Access and traffic

6.2.1. Introduction

The proposal involves the erection of two new grain silos and equipment on a rural allotment approved for large-scale grain handling operations.

Similar to other grain handling facilities in the region, the Manildra Group Grain Handling Facility at Grong Grong is operated on a seasonal basis, whereby the majority of activity is conducted for several weeks during harvest primarily involving truck receipt and unloading operations, followed by limited activity for several months other than product storage, train loading and transport and general maintenance of the site.

Road access to the site continues via internal access roads connecting to Nullong Road, which is a bitumen sealed local road, immediately south of the Newell Highway. Access onto the State highway network is

provided via an existing auxiliary left-hand turn (AUL) and channelised right-hand turn lane (CHR) intersection of Nullong Road and the Newell Highway, which was constructed as part of grain handling facility issued with an Occupation Certificate on 10 April 2006. Upgrades to Nullong Road and the railway crossing of the Junee Hay Railway Line were also completed as part of approved works.

Receivals by road occur primarily during the grain harvest season, which generally spans a 10-week period between October and January each year. Through this period, a peak of up to 5,000 tonnes per day can be received at the facility, distributed over a period of up to 16 hours per day. Most trucks accessing the facility have large carrying capacities, such as semi-trailers, B-doubles and Road Trains.

Dispatch of grain continues largely via rail, which is the most efficient method of haulage to either Narrandera or Nowra Flour Mills owned and operated by the Manildra Group. A maximum of two (2) trains per week are received at the Grong Grong facility, with all grain transported by rail by a contracted rail service provider (currently Pacific National) to either Narrandera or Nowra Flour Mills.

The Manildra Group intend to operate their facility within the storage limitations set under DA34-07/08. No new works on the public road network are required. On this basis, a traffic impact assessment has been undertaken.

6.2.2. Assessment of existing condition

DA46-02/03 was supported by a SEE prepared by North West Environmental in October 2002 which considered traffic generation and road and rail impacts resulting from the proposed development.

Road and rail infrastructure upgrades were completed as part of the establishment of the original AWB grain handling facility, which have proven robust / successful over 18 harvests, with no systemic queuing of trucks along public roads or over railways known to have occurred at the facility. No traffic accidents in and around the site are recorded on the TfNSW crash history map, with the nearest recorded accident being a non-series tow away light vehicle crash on the Newell Highway approximately 1.2 kilometres west of the site.

The traffic assessment that informed the scope of works for road and railway upgrades was documented in the North West Environmental Services SEE. With regard to the design vehicle used to inform the traffic generation forecasts, the North West Environmental Services SEE based all truck trips on a standard 25 tonne semi-trailer accessing the site. Predicted sources of grain were forecasted as 50% of trucks from the east and 5% from the west. A total of 2,600 trucks were projected to access the facility, based on the initial start-up volume of 135,000 tonnes per year. Total truck trips (inbound and outbound trucks) totalled 5,200 truck trips per annum for the initial start-up phase of 135,000 tonnes per year. A doubling of truck trips was assumed for the maximum capacity of 270,000 per year.

6.2.3. Assessment of potential impact

Grain transport by road continues today at the Grong Grong Grain Handling Facility via heavy vehicles, ranging in size up to semi-trailers, B-Doubles and Road Trains.

The Manildra Group kept a record of all truck deliveries over the 2022-23 harvest with 1,945 trucks being received over the peak harvest period, 28 November 2022 to 7 January 2023. Analysis of truck receivals data recorded by the Manildra Group shows the average grain delivery by truck was approximately 37 tonnes of grain per truck. Based on current average receivals totalling 140,000 tonnes per year, actual truck trip volumes are estimated at 3,784 truck trips per annum.

A Traffic Impact Statement has been prepared by Currajong that forecasted / actual truck trip generation remains below original traffic impact assessments undertaken for DA46-02/03 and DA34-07/08, which resulted in the upgrades to the Newell Highway and Nullong Road intersection upgrades, road upgrading and sealing of Nullong Road and widening of the railway crossing of the Junee Hay Railway Line.

The proposed installation of additional grain silos will generally not change the volume of grain stored at the site. Estimated numbers of trucks accessing and leaving the grain handling facility will also remain similar to existing, and well below the traffic assessment analysis undertaken in 2002 that warranted major upgrades to intersections, roads and rail crossings. The proposed new grain silos are required to improve grain load facilities onto railway trucks only, with mainstream storage limited by the storage capacity in existing / approved bunker storages.

Construction activities associated with the installation of proposed new silos and equipment will only occur for a short duration (six weeks) and will be outside of peak harvest periods. Traffic generation from the proposal will include the following:

- Rigid trucks carting gravel supplies for hardstand works, estimated @ 20 trips.
- Concrete trucks, estimated @ 20 trips.
- Semi-trailers carrying steel and sheet metal products, estimated at 15 trips.
- Crane, estimated @ 4 trips.
- Miscellaneous tabletop truck deliveries, estimated @ 10 trucks.
- Light vehicle movements, estimated @ 20 trips per day.

It is likely that there will be less traffic generated from the construction phase, with some vehicles remaining on the site during the entire construction period. Earthmoving equipment will not be required, with existing loaders and trucks used for these operations.

Overall, traffic and transport impacts are assessed to be low, based on existing local road conditions, traffic generation and no new road works proposed on either Nullong Road or the Newell Highway.

TfNSW have provide written comments on the proposed alterations and additions dated 2 June 2023 which advises a Traffic Impact Assessment is not required.

6.2.4. Management and mitigation

No additional mitigation measures are proposed, other than use of existing roads and accesses and adherence to Australian Road Rules and load limits.

6.3. **Biodiversity**

6.3.1. Introduction

The site has previously been cleared to allow broadacre farming for many years. Since 2002-2003 the site has been used as a large-scale grain handling facility, with earthworks, bunkers, roads, railways and routine spraying of paddocks.

6.3.2. Assessment of existing condition

The existing grain handling facility sits within a context of a rural land-use west of Grong Grong. The site of the grain handling facility is devoid of native vegetation, excepting a small pocket of vegetation within the rail

siding loop and along the eastern boundary of the site. The remainder of the land comprises either constructed works or vacant land that is periodically sprayed and sown to pasture grasses, as a means of managing weeds and slowing overland flows over the site.

6.3.3. Assessment of potential impact

The proposed development does not propose clearing of any native vegetation. Nearby pockets of native vegetation found on adjoining lands are not proposed to be cleared or altered as a consequence of the proposed development.

A significance assessment under Section 1.7 of the EP&A Act which takes into consideration Part 7 of the BC Act determining whether the proposal is likely to significantly affect threatened species and / triggers the Biodiversity Offsets Scheme (BOS) is provided in Table 2 – BC Significance Assessment:

Table 2 – BC Significance Assessment

Test	Assessment
(a) it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or	The site is located towards the eastern area the Narrandera Shire in the Murrumbidgee River catchment. The area immediately in and around the site is generally devoid of native vegetation, except for pockets of box eucalypts adjoining the site along road corridors assessed to meet the definition of BC Act native vegetation, as it provides a native overstorey, mid-storey, and shrub-storey and a grassy ground-layer. The site of the proposed new silos and equipment is devoid of native vegetation and located well away from existing native vegetation. No threatened species were observed during site inspection.
(b) the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or	The proposal involves no clearing of native vegetation. No significant impacts on threatened species or ecological communities are assessed. Contribution to the Biodiversity Offset Scheme (BOS) is not required.
(c) it is carried out in a declared area of outstanding biodiversity value	The site is not a declared area of outstanding biodiversity value.

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

6.3.4. Management and mitigation

No management or mitigation measures are required as a consequence of the proposed development.

6.4. Soils and water quality

6.4.1. Introduction

The proposal involves the erection of two new elevated grain storage silos and associated equipment to support an existing agricultural produce facility. Surface water runoff from the development site will be well-contained and managed with soil erosion and sediment controls. The entire grain handling facility is managed via detention basins and drainage swales. It is not proposed to excavate to groundwater level, which is estimated at depth. On this basis, a surface water and ground water impact assessment has been prepared for the proposal.

6.4.2. Assessment of existing condition

The site is not affected by the “Flood Planning” layer identified by Council or under the NSW Planning Portal. The likelihood of a flood inundating the site is low. The site is located on land identified as groundwater vulnerable identified by Council. Overland stormwater flow is controlled via a stormwater detention basin network with overflow directed to the south-west of the site.

6.4.3. Assessment of potential impact

The site is not affected by the “Flood Planning” layer identified by Council or under the NSW Planning Portal and the likelihood of flood waters inundating the development site is low. The site is located on land identified as groundwater vulnerable. The land is not identified as containing any watercourses or wetlands under the NLEP mapping. No groundwater extraction is proposed. The proposed development is unlikely to impact on surface water or ground water resources due to separation from groundwater and nearby waterways, the limited area of disturbance, small-scale nature of the construction phase and implementation of management measures will assist in managing the construction phase of new elevated silos to acceptable levels.

6.4.4. Management and mitigation

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

- No groundwater will be taken.
- Stormwater runoff entering the site from external areas, and non-sediment laden (clean) stormwater runoff entering a work area or area of soil disturbance will be diverted around or through that area in a manner that minimises soil erosion and the contamination of that water for all discharges up to the specified design storm discharge.
- All reasonable and practicable measures will be implemented to control flow velocities in such a manner that prevents soil erosion along drainage paths and at the entrance and exit.
- Stormwater from the proposed development will be directed to internal drainage channels constructed with silt traps. Such silt traps shall be cleared at regular intervals.

6.5. Air quality

6.5.1. Introduction

The proposed new elevated grain silos are well separated from nearby sensitive receivers and are unlikely to result in air quality impacts over and above that otherwise associated with the existing rural activities in the locality. On this basis, an air quality impact assessment has been prepared for the proposal.

6.5.2. Assessment of existing condition

The proposal involves the temporary storage of grain in new silos for loading onto rail trucks. The new silos and loading facilities are well setback from other rural land-uses and sensitive receivers.

6.5.3. Assessment of potential impact

The POEO Act sets the statutory framework for managing air quality in NSW, including establishing the licensing scheme for major industrial premises and a range of air pollution offences and penalties.

The POEO (Clean Air) Regulation 2022 sets standards of concentration for emissions to air from both scheduled and non-scheduled activities. For the proposal activities, the POEO (Clean Air) Regulation provides general standards of concentration for scheduled premises which are:

- Solid particles (total) – Any activity or plan (except listed below) – 100mg m³.

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

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

- Truck haulage, loading and unloading operations during construction.
- Emissions from vehicle and generator exhaust.

The specific pollutants of interest associated with those activities are:

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

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

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

6.5.4. Management and mitigation

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

The proposed emissions controls to be employed at the site are as follows:

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

6.6. Noise and vibration

6.6.1. Introduction

The proposal involves the construction of new silos, and the temporary storage of grain for unloading into rail trucks at an existing grain handling facility. The proposed grain silos are to be well separated from the nearest sensitive receivers and are unlikely to result in noise or vibration impacts. On this basis, a noise impact assessment has been prepared for the proposal.

6.6.2. Assessment of existing condition

The site sits within a context of rural land-use. There are no dwellings or other sensitive land-uses in close proximity to the existing grain handling facility. The proposal involves continued the delivery, storage and redistribution of grain to and from the site. It is assumed all noise sources will be contained with the existing site footprint area excepting noise from haulage vehicles accessing the site via the public road network.

6.6.3. Assessment of potential impact

No changes to site conditions are proposed, other than the installation of the grain silos and associated equipment.

Construction operations will generally be limited to a six-week period and during daylight hours only. Noise emissions associated with the construction phase are unlikely to have a significant noise impact due to the separation from nearby sensitive receptors and roads, small scale of haulage operations and infrequency of haulage operations.

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

Post construction, the silo operations will not generate any significant noise, with mechanical plant generally being enclosed and designed to have low noise footprints. No impacts on adjoining land-uses are assessed.

6.6.4. Management and mitigation

The proposed noise management measures are to be employed at the site are as follows:

- Operations during daylight hours with only minor extended trading hours during peak harvest periods.
- Enclose fixed engines, pumps and compressors where practicable for onsite machinery.
- Maintain silos and equipment in accordance with the original equipment manufacturer's specifications.

- Shut down equipment when not in use.
- Control vehicle speed on internal access roads.
- Avoid unnecessary operation of plant or revving of mobile or stationary motors and engines.
- Mobile plant and equipment operated at the site should be selected and maintained to minimise noise emissions.
- All internal roads for road haulage and off-road trucks shall be constructed and maintained to avoid excessive noise associated with uneven surfaces and potholes.

6.7. Heritage

6.7.1. Introduction

The site is not listed as heritage items under the NLEP 2013 or State Heritage Register. Assessment of the potential impacts associated with cultural and built heritage have been considered in this section.

6.7.2. Assessment of existing condition

There are no recorded Aboriginal heritage sites recorded in and around the site. The proposal involves the operation of a grain handling facility in a rural zone. The site comprises 'disturbed land', as defined under NPW Regulation. The site is not listed as a local heritage item listed under the NLEP 2013 or State Heritage Register. There are no features of the site that are particular rare or have significant heritage value.

6.7.3. Assessment of potential impact

A visual inspection of the site reveals a highly disturbed / modified built environment. Section 80B of the NPW Regulation define disturbed land as follows:

Land is disturbed if it has been the subject of a human activity that has changed the land's surface, being changes that remain clear and observable. Examples include ploughing, construction of rural infrastructure (such as dams and fences), construction of roads, trails and tracks (including fire trails and tracks and walking tracks), clearing vegetation, construction of buildings and the erection of other structures, construction or installation of utilities and other similar services (such as above or below ground electrical infrastructure, water or sewerage pipelines, stormwater drainage and other similar infrastructure) and construction of earthworks.

Due to the disturbed nature of the site, it is unlikely that any items of Aboriginal heritage will be discovered during installation of the new silos and associated equipment. The proposal is considered to be a "low impact activity" and is exempt from the Due Diligence process as per Section 80B (1) of the NPW Regulation. Consequently, an Aboriginal Archaeological Due Diligence Assessment is not required.

Assessment of historic and built heritage is open for assessment, based on the matters for consideration under Section 4.15 of the EP&A Act. This assessment has revealed no impacts on heritage items. Consequently, a Heritage Impact Assessment is not required.

6.7.4. Management and mitigation

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

6.8. Public safety hazards

6.8.1. Introduction

An assessment of the potential impacts of the proposal on:

- hazards;
- worker safety;
- public safety (pedestrian and motorists);
- contamination; and
- waste

in order to minimise safety risks and impacts on the public domain.

6.8.2. Assessment of existing condition

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

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

6.8.3. Assessment of potential impact

The land is not identified as a bushfire prone allotment. The subject land has been largely cleared and has been highly managed. Surrounding land is used for rural and infrastructure purposes, with no sensitive receivers within proximity of the site.

The site is not flood prone.

In relation to public safety risks associated with unauthorised access to the site, the site is fenced, gates would be locked when not in use and appropriate signage alerting the public to the site office would be placed at the entrance to the access to the proposal. As a result, public safety risks associated with unauthorised access to the site are considered negligible.

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

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

6.8.4. Management and mitigation

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

Fire Hazard

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

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

Unauthorised Access

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

Waste

The proposal would ensure the following:

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

6.9. Social and economic impacts

6.9.1. Introduction

An assessment of potential social and economic impacts of the proposed development has been undertaken.

6.9.2. Assessment of existing condition

The site and surrounding land are zoned RU4 Primary Production Small Lots. The proposed grain silos are to be located on an existing rural allotment that has been used for the storage of grain and agricultural produce for many years. The land surrounding the proposed development will continue to be used for rural and infrastructure purposes.

6.9.3. Assessment of potential impact

An assessment of potential impacts of the proposed development has been undertaken with regards to scoping methodology outlined in the Social Impact Assessment Guideline 2017 (SIA Guideline), published by the Department of Planning and Environment.

The proposed development will make a neutral social impact. The proposal would be unlikely have any unacceptable impacts on residents or the environment within or surrounding the site. As a result, adverse socio-economic impacts are assessed to be negligible.

6.9.4. Management and mitigation

Management and mitigation measures for each of the elements comprising a potential social impact (e.g. noise, traffic, visual amenity and air quality) have been addressed in their relevant sections of this report.

The proposal would implement the following management and mitigation measures to ensure that the proposal-related benefits for the community surrounding the site are maximised and adverse impacts are minimised:

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

7. EVALUATION AND JUSTIFICATION FOR THE PROPOSAL

7.1. Introduction

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

7.2. Objectives of the EP&A Act 1979

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

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

7.3. Ecological sustainable development

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

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

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

- The precautionary principle - No serious environmental threats have been identified. No delays to the final design investigations or assessment process are recommended to allow for additional information / studies / surveys to take place under different climatic or seasonal conditions.
- Inter-generational (social) equity - Social equity provides a notion of preservation of environmental aspects that cannot be replaced for the enjoyment of future generations. Generally, such aspects relate to biodiversity, cultural heritage, land-use and the transformation of the locality as a result of the development. The proposal has considered such aspects and the SEE assessment concludes that environmental impacts will be minimal. By adopting the recommendations in this SEE for the operational phases, the operation of intergeneration equity can be maintained.
- Conservation of biological and ecological integrity - Given the highly disturbed / modified nature of the site, no significant flora or fauna issues have been identified. Procedures will be implemented during construction and operation of the premises to minimise potential risks on the environment.
- Improved valuation, pricing and incentive mechanisms - The small volumes of waste generated from the proposal will be appropriately managed to minimise impacts on common public areas, the appropriate pricing mechanism are used to reflect the user pays approach to environmental management.

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

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

7.4. Safety, security and crime prevention

The design of the premises has focused on the safety and well-being of all users, including staff and contractors. The design maintains good safety standards. Adequate site security will be maintained and clear sightlines around entry / exits to ensure safety of all systems and operations dealing with grain storage and loading operations.

7.5. Cumulative impacts

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

7.6. Suitability of the site for the development

The suitability of the site has been proven with appropriate design, development and operation of a grain handling facility at the site for over 20 years. The site has the capacity to support the proposed development without creating adverse impacts on the site or adjoining land. The proposal is considered suitable on the site.

7.7. Public interest

The proposed new silos, conveyors and augers will be installed next to existing elevated silos and loading equipment at the existing Manildra Group Grain Handling Facility. The silos will be of a similar height to existing silo structures. No impacts on public airport operations or the like are assessed to apply.

The proposed alterations and additions to an existing grain handling facility are permitted on land zoned RU4 Primary Production Small Lots. There are no specific policy statements from either Federal or State Government that are relevant to the proposal, nor any planning studies or strategies that need to be taken into account. There are no covenants, easements or agreements that affect the proposal in the long term.

The proposal is assessed to pose no significant detrimental impacts on the public interest.

8. CONCLUSION

This Statement of Environmental Effects has been prepared by Currajong Pty Ltd on behalf of the Manildra Group to support a Development Application for additions to an existing Agricultural Produce Industry. The proposed works comprise the erection of 2 x 3,633 tonne storage silos, drag conveyors, sweep augers and gates to provide improved rail truck loading facilities.

The erection of the elevated silos and associated loading equipment will assist in improving operational efficiencies associated with the loading of grain onto rail trucks for delivery by trains to regional flour mills operated by the Manildra Group.

The assessment of the proposed new silo installations has been documented in this report to visualise all aspects of the relevant matters for consideration under the Environmental Planning and Assessment Act 1979. The assessment concludes the proposal is permissible in the RU4 Primary Production Small Lots zone and consistent with all relevant design standards.

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