



Application for Licence

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L2938/2025/1
Applicant	BGC (Australia) Pty Ltd
ACN	ACN 005 736 005
Application number	APP-0028552
Premises	Midland Brick Blokstone Caversham 29 Harper Street CAVERSHAM WA 6055 Legal description - Lot 2984 on Deposited Plan 202244 Certificate of Title Volume 1099 Folio 219 and Lot 2985 on Deposited Plan 202244 Certificate of Title Volume 2022, Folio 32 As defined by the premises map attached to the issued licence
Date of report	3 July 2025
Decision	Licence granted

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1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the operation of the premises. As a result of this assessment, licence L2938/2025/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) has considered and given due regard to its regulatory framework and relevant policy documents which are available at [DWER Regulatory documents | Western Australian Government](#).

2.2 Application summary

On 14 April 2025, BGC (Australia) Pty Ltd (BCG, the applicant) submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

The application is to seek a licence for operation of an interim, mobile concrete batching plant, limestone block laying machine and associated infrastructure at the Midland Brick Blokstone facility (premises), located at 29 Harper Street Caversham. The premises is approximately 1 kilometre (km) southeast of the residential area of Caversham.

The applicant has applied to undertake Category 77: concrete batching or cement product manufacturing with a maximum production capacity of 360 000 tonnes per year and Category 61A: solid waste facility with a maximum production capacity of 110 000 tonnes per year relating to the acceptance and storage of crushed concrete waste material from other BGC operations which will be incorporated into the production of limestone blocks. The categories and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) are defined in licence L2938/2025/1 (licence). The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in the licence.

BGC proposes to undertake limestone block manufacturing on the premises using the interim infrastructure to fill limestone block supply gaps for residential land developments while its permanent reconstituted limestone manufacturing facility is constructed on the premises. The interim plant infrastructure is not intended for continued use once the permanent manufacturing facility is established.

2.3 Overview of prescribed premises

A roof tile manufacturing facility was previously operated on the premises by Austral Bricks (WA) Pty Ltd under licence L6825/1967/17. Some infrastructure remains from previous operations.

The Local Government Authority is the City of Swan and the site is zoned Special Use Zone No.1 with the following bespoke land use permitted on the subject lots consistent with Schedule 4 of Swan Valley Planning Scheme No.1 (SVPS1): *Manufacture and Sale of Building Products and Associated Activities including Clay Extraction*.

A works approval (W6913/2024/1) for Category 13: Crushing of building material, Category 61A: Solid waste facility and Category 77: Concrete batching or cement products manufacturing was granted on 26 February 2025. The works approval authorises the construction and time limited operation of infrastructure for a permanent reconstituted limestone manufacturing facility on the premises. The granted works approval is currently under appeal and is under review by the Office of the Appeals Convenor.

The applicant intends to operate the interim concrete batching plant until the construction of the permanent concrete batching plant regulated under W6913/2024/1 is complete (approximately six months); at which time an Environmental Compliance Report will be submitted to the department. The applicant may apply to amend its licence to include infrastructure constructed under W6913/2024/1 as required under section 59B of the EP Act.

2.4 Overview of activities

The applicant intends to operate the interim mobile batching plant, limestone block laying machine and associated equipment on the premises to commence production of reconstituted limestone blocks. The mobile batching plant is brand new. All equipment is in place on the premises ready for use. Operation of the plant will occur between the hours of 7am to 7pm Monday to Saturday.

The block making process comprises the following key activities:

- Various raw materials including crushed limestone, crushed recycled material, ferracrete, cracker dust and cement are processed through a mobile batching plant to be mixed.
- Batched material is transferred from the batching plant to a concrete kibble which transfers the material into the mobile block laying machine to be formed and laid into limestone blocks. Block laying occurs within the premises hardstand area to the south of the batching plant.

The following infrastructure will be operated on the premises for the production of limestone blocks:

- a mobile MBD2200B concrete batching plant comprising a mixer, feed hoppers, bins, ramps, discharge conveyor and augers;
- two mobile cement silos with dust collectors;
- a permanent spent lime silo with dust collector;
- a mobile Finlay block laying machine; and
- forklifts and loader.

A general layout of the batching plant is included in Figure 1 and Figure 2. The applicant advised the concrete batching plant meets relevant requirements of the Environmental Protection (Concrete batching and Cement Product Manufacturing) Regulations 1998 (Concrete Batching Regulations).

Raw materials for concrete batching and crushed concrete waste material from other BGC processes will be stored in covered stockpiles on the hardstand adjacent to the batch plant. The block laying machine will also operate on the hardstand. No crushing will be undertaken on the premises as raw materials will be delivered in their required form.

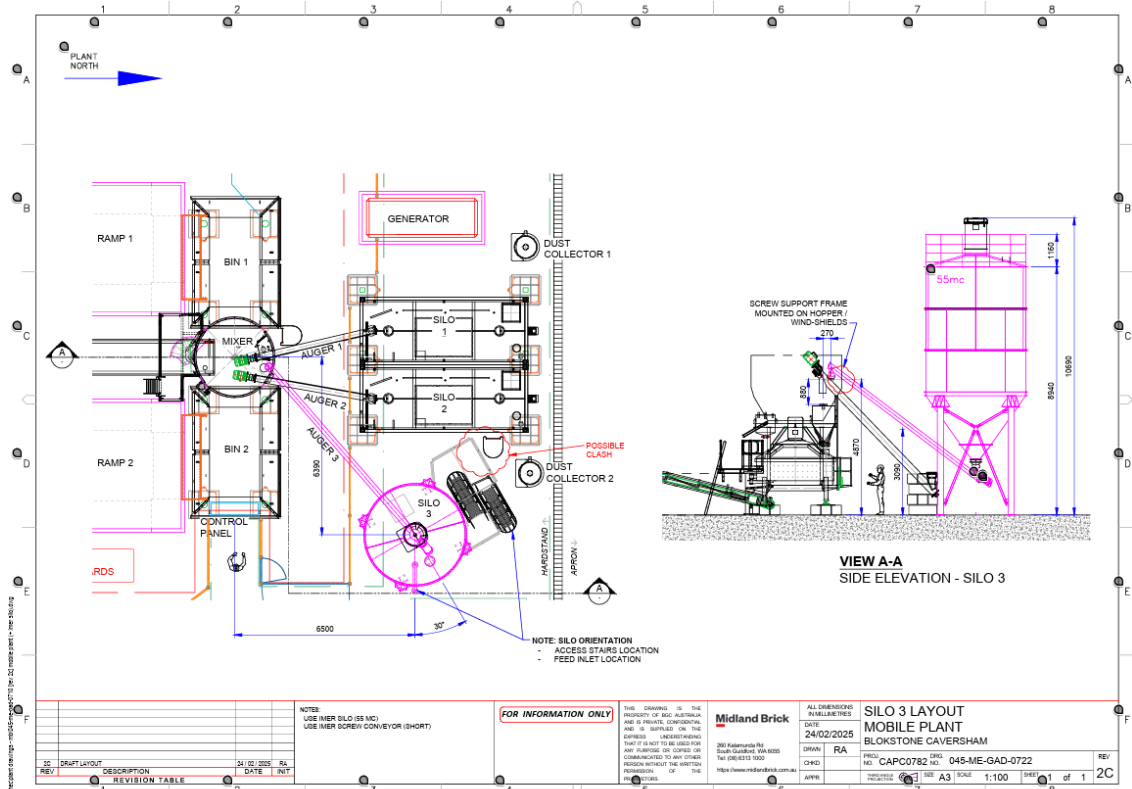


Figure 1 Mobile concrete batching plant layout with lime silo

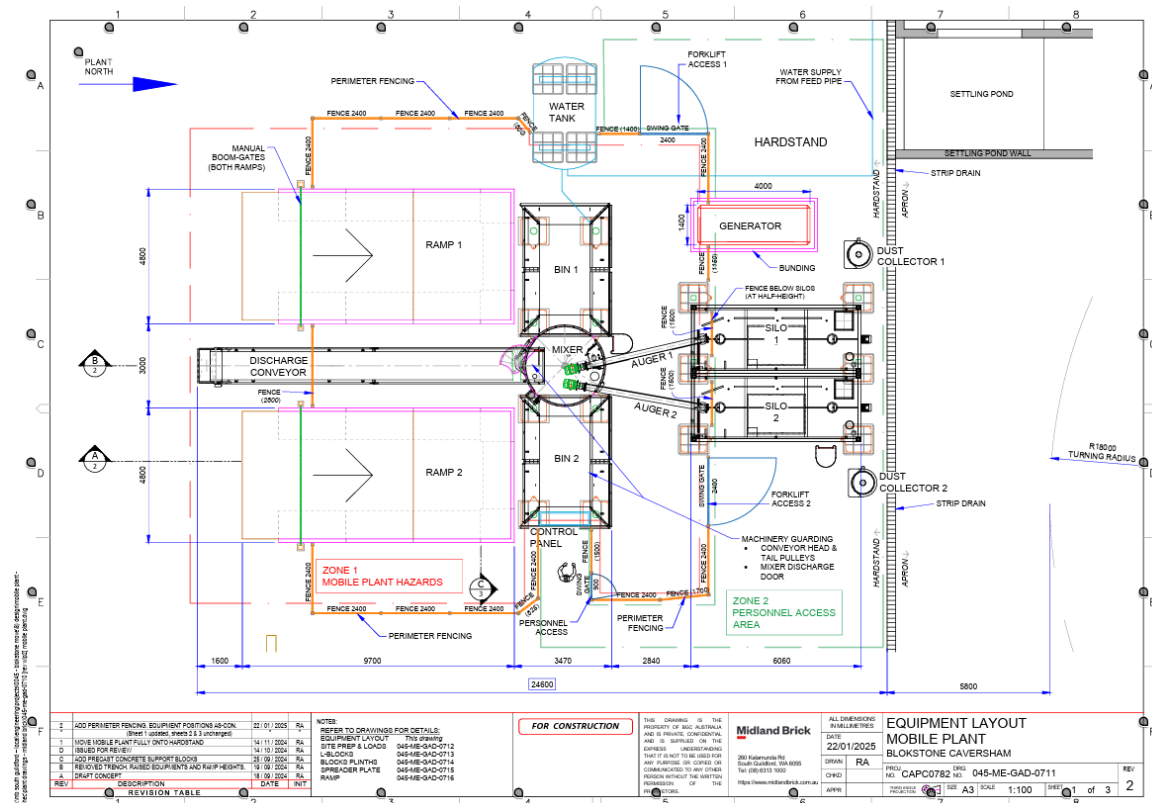


Figure 2 Mobile concrete batching plant layout

2.4.1 Stormwater management

The applicant is establishing permanent stormwater drainage and management infrastructure on the premises in accordance with the requirements of W6913/2024/1. As the drainage infrastructure was not complete at the time of the licence application interim stormwater management is proposed. Stormwater from the concrete batching area and stockpiles will be directed via the graded hardstand to a sediment sump to the north of the hardstand. As the raw material stockpiles are proposed to be covered with tarpaulin, runoff from the stockpiles is not expected to contain significant sediment. The applicant also proposes to utilise captured stormwater in the block production process. Given the proposed reuse of captured runoff and the scale and footprint of the interim batching and block making activities the applicant considers the sediment sump to be adequately sized to manage expected run-off volumes. No chemical cleaning of equipment associated with the interim plant will be carried out, therefore sediments from concrete production activities and occasional hydrocarbon spills are the only expected source of stormwater contamination.

2.5 Noise emissions

Lloyd George Acoustics was engaged by the applicant to undertake an Environmental Noise Assessment (ENA) to assess whether the proposed interim activities on the premises are expected to comply with the assigned noise levels as per the Environmental Protection (Noise) Regulations 1997 (Noise Regulations) at the closest receptors to the premises. The ENA was included as part of the licence application. The ENA considered noise measurements undertaken on the 11 March 2025 when the plant was operated for a short number of hours to ensure the plant operated as required and for assessment of noise levels. A calibrated Bruel & Kjaer Type 2250 sound level meter was used to quantify source noise levels from the premises infrastructure.

Sound power level measurements were undertaken for the mobile batching plant, Komatsu Loader, Finlay mobile block laying machine and associated forklift. Noise measurements were undertaken when the Finlay block laying machine acoustic panels were out for repairs to get an indication of noise impact without the curtains, however exhaust mufflers were fitted. Measurements were also taken when the loader was in reverse with the audible alarm sounding. The sound level measurements were used to develop a 3D noise model for the premises to predict received noise levels at the industrial premises to the immediate east, the agricultural property to the immediate south and the closest residential receptors located to the south-east of the premises.

The ENA concluded that noise levels may exceed the Noise Regulations assigned levels by 8 dB at the industrial premises boundary located to the east (R5) and the agriculture boundary located to the south (R4) (inclusive of a 5 dB penalty for tonality) primarily due to the block layer and loader operations. As the occupied areas are understood to be within the warehouses situated at a distance further from the boundary, the ENA concluded the predicted exceedances are considered unlikely to be an issue and could be discussed with the neighbouring premises. Noise at all nearby residences was predicted to meet the assigned levels assuming background noise from the nearby major road (West Swan) will mask tonal characteristics at 1110 and 1011 West Swan Road (R2 and R3).

The ENA recommended that noise impact be reduced by minimising the time mobile plant operates near the south and east boundaries of the hardstand, maintenance of low speeds for mobile equipment and use of broadband reverse alarms. Noise emissions were also expected to be reduced when acoustic panels are in place on the block laying machine. The applicant committed to fit the loader with low frequency squawkers to replace reverse beepers and to operate the block laying machine with acoustic panels in place.

A comparison of the ENA predicted noise levels with assigned noise levels for relevant receptors in proximity to the premises is included in Table 1.

Table 1: Predicted noise level assessment for closest receptors

Receptor	Daytime (7am-7pm Mon-Sat) assigned level L_{A10} (dB) (includes IF)	Predicted noise level L_{A10} (dB)	Assessment
R1 - Lot 122 West Swan Road	48 ¹	57 ²	+9 dB
R2 - 1110 West Swan Road	52	52	Complies
R3 - 1011 West Swan Road	52	51	Complies
R4 - 33 Harper Street (agricultural)	60	68 ²	+8 dB
R5 - 28 Harper Street (Industrial)	65	73 ²	+8 dB

NOTE 1: ENA calculated an assigned level of 57 dB, based on a 12 dB IF. The IF was incorrectly calculated and the assigned level has been revised based on the correct IF of 3 dB.

NOTE 2: Includes a +5 dB penalty for tonality. No penalty at R2 and R3 as nearby major road noise is likely to mask tonal characteristics.

The applicant also undertook noise monitoring using a Protech OM1598 sound level meter on 31 January 2025 at several locations to verify received sound levels. Sound levels were measured at a distance approximately 5 m from the equipment, at the premises entry (southern boundary) and at residences approximately 300 m north of the premises activities. At the time of the measurements the block laying machine was operating and fitted with acoustic panels but not filled with product. The applicant advised noise is expected to be less when the machine operates with product due to an echo effect which occurs when the machine is vibrating and empty.

2.5.1 Technical review

The department conducted a technical review of the ENA and concluded it was undertaken to an acceptable level to inform the assessment of the risk of noise emission impacts.

Based on the ENA it is agreed that noise emissions from operation of the premises may exceed the assigned noise levels by 8 dB at the industrial boundary (R5) located to the east and the agriculture boundary (R4) to the south primarily due to the block layer and loader operations. The technical review also identified that noise emissions from the premises may exceed the assigned noise levels by 9 dB at the residential receptor R1 to the north.

Implementation of both the acoustic curtains on the block layer and low frequency squawkers to replace reverse beepers on the loader are expected to be effective in reducing noise impact on the neighbouring receivers, however they are not expected to be able to achieve the required 8 dB reduction at the two boundary locations where the noise exceedances are predicted. The non-tonal reversing alarms will remove tonality from the loader noise emissions but are not expected to significantly reduce the overall noise level of the loader. The acoustic curtain is expected to be somewhat effective however gaps observed in the image of the curtain will impact its attenuation. Additional noise control such as temporal noise panels/noise walls between key sources and receptors are a more appropriate noise control to achieve the required reductions.

The influencing factor (IF) in the ENA calculated for R1 was noted as being significantly higher (+9 dB) than the IF calculated for the noise assessment previously undertaken for W6913/2024/1 for the permanent limestone block manufacturing infrastructure. The difference is due to the amount of land considered industrial land for the purpose of IF calculation. A

reduced IF of 3 dB is considered appropriate for R1 on the basis that land which is zoned rural and not in use for industrial purposes should not be considered in the calculation. On the basis of a reduced IF, noise emissions from the premises are expected to exceed the assigned noise levels at R1 by 9 dB (if considered tonal) with additional noise control required.

2.6 Air quality – dust emissions

The batching plant, block laying machine, stockpiles and vehicle movements are potential sources of dust emissions during operation of the premises. The applicant has developed a Dust Management Plan and, in accordance with the conditions of W6913/2024/1, has installed continuous Beta Attenuation Mass monitors for measurement of ambient dust concentration (PM₁₀, particles with a diameter of 10 micrometres or less) which are required to operate in accordance with the works approval. Key dust management controls from the applicant's management plan which are relevant to operation of the interim infrastructure for the licence are outlined in section 3.1.1. The applicant advised that as the concrete batching is a wet process it is not expected to generate significant amounts of dust and crushing activities which have a higher potential for dust emissions are not proposed as part of the interim operations.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this decision report are detailed in Table 2 below. Table 2 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary. Construction activities are outside the scope of the licence application as the infrastructure exists on the premises.

Table 2: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Operation			
Dust	Vehicle movements, lift-off from stockpiles and/or stored product, operation of concrete batching plant, block laying machine, raw material deliveries.	Air / windborne pathway	Daily visual monitoring for dust. Ambient dust monitors have been installed in accordance with works approval W6913/2024/1 and will be operational at all times during production Sweeper will be utilised onsite daily during operations as well as water carts to mitigate dust on the hardstand pad and ring road. Water cannons for dust suppression have been installed at the perimeter of the block laying pad (hardstand) will be utilised for dust

Emission	Sources	Potential pathways	Proposed controls
			suppression as needed. Raw material stockpiles to be kept to a minimum and covered with tarpaulins. Cement and lime will be stored within silos which have been fitted with overfill protection system with an alarm (including a test circuit), and a fabric filter air cleaning system and a pressure gauge in accordance with the Concrete Batching Regulations. The air cleaning system will be inspected and tested weekly and blocked or damaged filters will be cleaned, repaired or replaced as soon as practicable. The overfill protection test circuit will be activated prior to unloading cement and unloading will not occur if it is not operational. All ports hatches and openings on the silo will be closed when cement or lime is unloaded and unloading will cease if visible dust escapes the silo. Hoppers are fitted with wind shields Any material spilt during cement product manufacturing will be cleaned up immediately. Weather forecasts (wind speed and direction) will be used to plan and modulate operations to minimise dust generating activities during adverse meteorological conditions. Dust-generating activities will be ceased during strong wind conditions. Vehicle speed limits of less than 15 km/hr will be enforced and movements will be via the paved access road, ring-road and hardstand areas. Raw material delivery trucks will be inspected before leaving the site to ensure that they are free of dust. Tarpaulin covers will be applied during aggregate and sand transportation.
Noise	Operation of block laying machine, batching plant generators, vehicle movements and reversing beepers, mobile batching plant.	Air / windborne pathway	Batching plant and block-laying machine only to be operated between "day-time" hours (7am to 7pm, Mon – Sat; Finlay mobile block layer to be fitted with acoustic curtains and exhaust mufflers. Loader to be fitted with low frequency squawkers instead of reversing beepers.
Potentially contaminated	Contaminated stormwater runoff	Direct discharge	Raw material stockpile to be kept at a minimum and kept under cover of tarpaulins

Emission	Sources	Potential pathways	Proposed controls
water	from uncovered hardstand, stockpiles and process water. Cement and hydrocarbon spills	and seepage to soil and groundwater Runoff	during operations. Stormwater from the graded hardstand directed to a collection sump. Stormwater to be managed in line with the site's Storm Water Management Plan. Spills to be cleaned up immediately. No vehicle washing will occur on the premises.

3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the applicant's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Table 3 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Closest human receptors	R1 - Residence 200 m north of boundary (Lot 122 West Swan Road) R2 - Residence 350 m southeast of boundary (1110 West Swan Road) R3 - Residence 300 m southeast of boundary (1011 West Swan Road)
Agricultural receptor	R4 - 20 m from southern edge of premises boundary (33 Harper Street)
Industrial receptor	R5 - 20 m east of boundary (28 Harper Street)
Commercial receptor	R6 - Commercial premises 300 m north of boundary
Environmental receptors	Distance from prescribed activity
Threatened and priority flora: WA Herbarium Specimen Database	Southwest of activity and within premises boundary. No clearing is proposed as part of this application
Threatened Ecological Communities (TEC) and Priority Ecological Communities (PEC)	The majority of the premises lies within a TEC buffer with a portion of the TEC within the premises boundary.
Underlying groundwater (non-potable purposes)	Groundwater is present at depths of approximately 7.7 meters below ground level (mbgl) with the base of the aquifer at 14.00 mbgl. (Perth Groundwater Map). The applicant has provided information demonstrating that groundwater wells on site from previous reporting

	(Talis, 2018) indicate groundwater to be between 3.62 mbgl to 7.25 mbgl. Information provided in the Perth Groundwater Map indicates that groundwater is considered to be fresh (TDS 250 – 500 mg/L) and regional flow is in a south easterly direction towards the Swan River.
Threatened Fauna	Carnaby's cockatoo (<i>Zanda latirostris</i>) – previously sighted 200 m from southwest corner of the premises boundary Quenda (<i>Isoodon fusciventer</i>) – previously sighted 900 m from prescribed premises. The nearby river (Bennet Brook) and its associated wetlands serve as a habitat for numerous native fish, reptiles, mollusks, crustaceans, and macroinvertebrates.
Surface water bodies	The Bennet Brook and its associated wetlands is located 300 m west of the premises boundary. A lake is located within the wetland adjacent to the premises and is a declared lake under the Environmental Protection (Swan Coastal Plain Lakes) Policy 1992. It flows through Mussel Pool and runs into the Swan River. There is a system of wetlands that are interconnected along Bennett Brook. The brook holds significance to the Aboriginal people as hunting grounds and as a water source, with some of the wetlands associated with the brook being considered a conservation category wetland.

The prevailing 9 am wind direction is an easterly towards Bennet Brook and the wetland system. The closest receptors to the west of the premises are over 1 km away. The 3 pm prevailing wind direction is from the south-west towards the northern vineyards and residences.

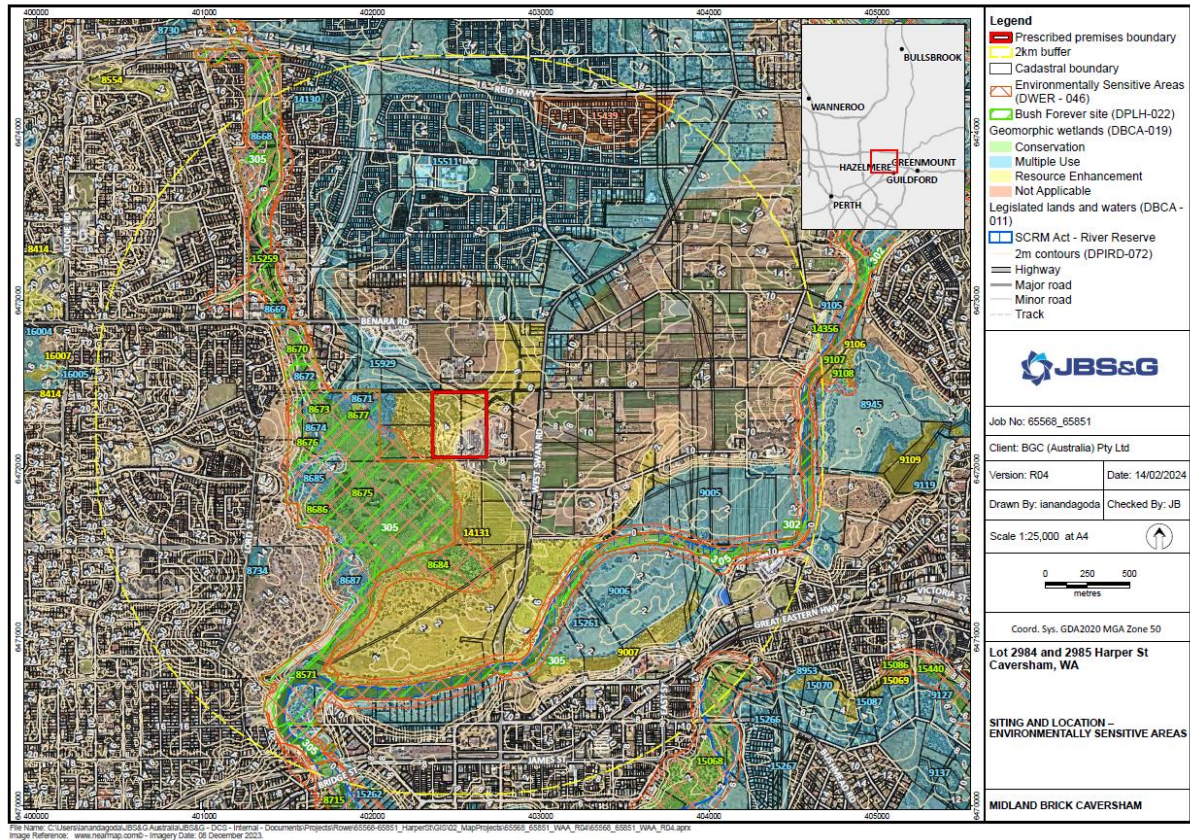


Figure 3 Prescribed premises distance to environmentally sensitive areas

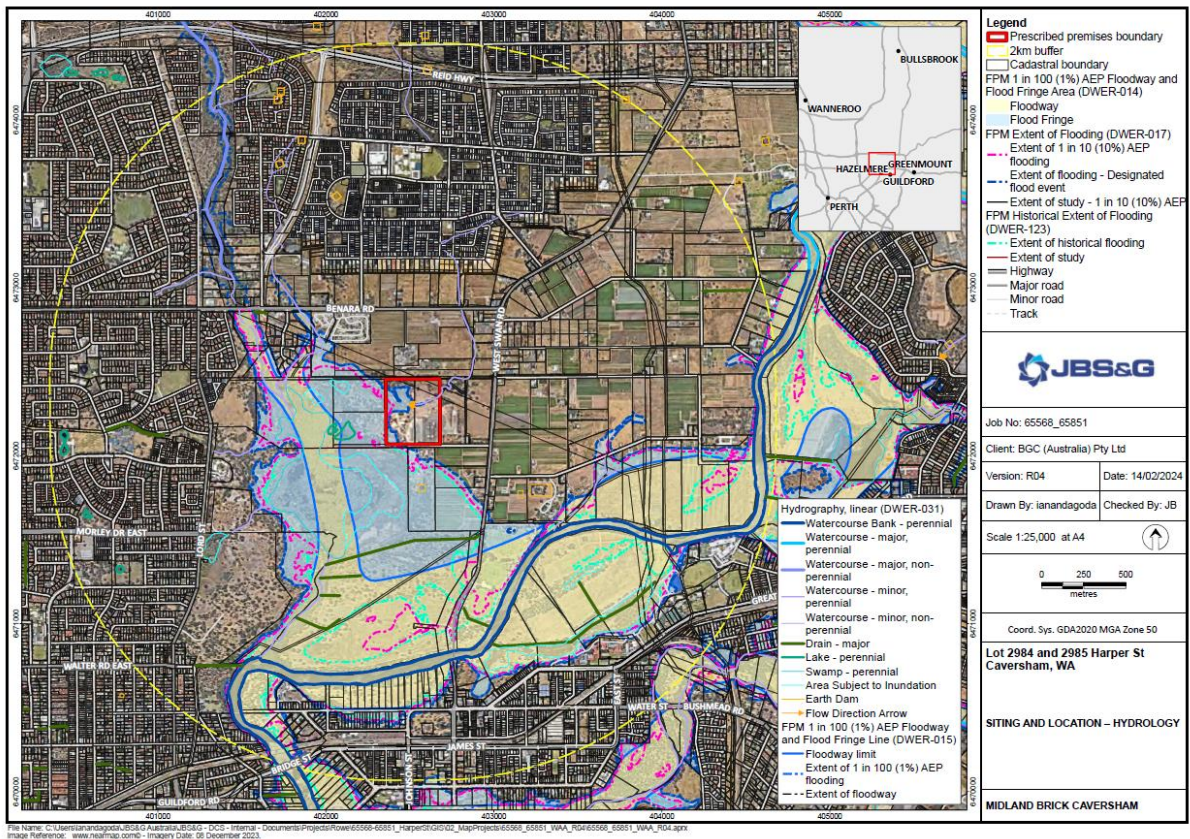


Figure 4 Prescribed premises distance to surface waterbodies and lines

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the delegated officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

Licence L2938/2025/1 that accompanies this decision report authorises emissions associated with the operation of the premises i.e. operation of a mobile mixer and block laying machines and associated silos and stockpiles.

The conditions in the issued licence, as outlined in Table 4 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 4: Risk assessment of potential emissions and discharges from the premises during operation

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Operation								
Operation of mobile concrete batching plant and block laying machine and raw material stockpiles	Dust	Pathway: Air / windborne Impact: Health and amenity	Commercial/ industrial premises from 20 m from eastern boundary Residential receptors from 200 m from northern boundary	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	N	Condition 1 Condition 3 Condition 6 Condition 7	The delegated officer considered the dust mitigation measures proposed by the applicant are generally suitable to mitigate dust emissions from the premises operations and comply with the Concrete Batching Regulations. Relevant operational and maintenance controls have been included as requirements in the licence. Raw material stockpiles were identified as a potentially significant source of dust emissions without adequate controls. The applicant's commitment to cover the stockpiles has been conditioned and the delegated officer applied additional limits on the height and volume of stockpiled material to further mitigate dust risk. The volume restrictions are also expected to mitigate potentially contaminated stormwater from the stockpiles. Limits were determined based on information provided by the applicant on expected truck deliveries. Waste acceptance criteria limited to the waste types the applicant has proposed have also been included to ensure only those wastes considered in this assessment are accepted onto the premises and any non-conforming wastes are
		Pathway: Air / windborne Impact: crop degradation	Vinyard from 50 m from southern boundary					

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
		Pathway: Air / windborne Impact: Water quality impacts or vegetation health impacts due to smothering	Bennet Brook and Wetlands from 300 m from boundary		C = Moderate L = Unlikely Medium Risk			appropriately managed. The delegated officer noted the applicant is subject ambient dust monitoring and reporting requirements of conditions within works approval W6913/2024/1 and that the monitors are in place and operational.
	Noise	Pathway: Air/windborne pathway Impact: Amenity impact and disruption to fauna	Residential receptors from 200 m from boundary	Refer to Section 3.1	C = Major L = Possible High Risk	N	Condition 1 Condition 2 Condition 4 Condition 8-11	Based on review of the ENA the delegated officer determined that noise emissions from operation of the mobile concrete batching plant and power generation when operated during standard daytime hours (7am to 7pm Mon-Sat contribute to a predicted exceedance of the Noise Regulations assigned levels at the residence at 122 West Swan Road and may cause amenity impact. Additional noise attenuation is required to ensure noise emissions do not impact amenity or exceed assigned noise levels. The delegated officer deemed it appropriate to specify maintenance of a 1.8 m high noise barrier to the north of the concrete batching plant and generator as well as a noise muffler and acoustic enclosure for the generator. The wall will include gaps to allow for required vehicle access. The applicant provided details of an existing wall of stored tiles on the northern boundary of the
			Carnaby's cockatoo		C = Moderate L = Unlikely Medium Risk			

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								premises as an additional noise mitigation measure to address the absence of the noise wall indirectly in front of the batch plant. Maintenance of this wall has therefore been specified in the licence conditions. To ensure noise attenuation measures effectively control noise emissions to comply with the Noise Regulations a noise verification study inclusive of an action plan if noise emissions are not found to comply with the Noise Regulations has been included.
	Potentially contaminated stormwater (sediments, elevated pH, hydrocarbons) Minor hydrocarbon spills or leaks	Pathway: Direct discharge to land and overland runoff or infiltration to groundwater Impact: Ecosystem disturbance or impact to groundwater or surface water quality	Bennet Brook and Wetlands from 300 m from boundary TEC and Threatened/Priority Flora within the premises	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	<u>Condition 1</u> <u>Condition 5</u>	The delegated officer noted that permanent stormwater management/drainage infrastructure is under construction on the premises as per requirements of W6913/2024/1. The applicant proposes to direct potentially contaminated runoff to two concrete slurry pits to the north of the batch plant and considers they are adequately sized for the expected volumes but that no water balance information was provided to confirm this. Chemical/hydrocarbon spills are expected to be limited to oil spills from vehicles. The batch plant and raw material stockpiles are considered the most likely sources of potentially contaminated runoff. Wash-water is not expected to be generated as there are no vehicle washing facilities on the premises and the applicant proposed to dry clean agitator trucks rather than

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								washing. To mitigate the risk of contamination and ecosystem impacts and ensure the premises activities comply with relevant requirements of the Concrete Batching Regulations, in addition to the applicant's proposed water and spill management controls, the delegated officer has specified a requirement for all water draining from the concrete batching plant, silos and stockpile areas to be directed into the slurry pit. Requirements to manage water and sediments in the sumps consistent with the Concrete Batching Regulations to prevent discharge of potentially contaminated water to the environment have also been included in the licence. The licence does not include any authorised discharge of potentially contaminated water. As there is no dedicated vehicle wash facility to capture wash-water, the delegated officer determined to include a condition prohibiting washing of vehicles on the premises.
Vehicle movements including reversing beepers (loaders, forklift, block laying machine)	Noise	Pathway: Air/windborne pathway Impact: Health and amenity	Commercial/industrial receptors from 20 m from boundary Residential receptors from 200 m from boundary	Refer to Section 3.1	C = Major L = Possible High Risk	N	<u>Condition 1</u> Condition 2 Condition 4 <u>Condition 8-11</u>	Based on review of the ENA the delegated officer determined the key sources of noise emissions being the Finlay Block Layer and the Komatsu Loader are predicted to cause exceedance of the Noise Regulations assigned levels at the neighbouring industrial and agricultural premises to the east and south respectively, and may cause amenity impact. Additional noise attenuation is required to ensure

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Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								noise emissions do not impact amenity or exceed assigned noise levels. The delegated officer deemed it appropriate to specify maintenance of a 1.8 m high noise barrier to the east and south of the concrete batching plant as well as implementation of the applicant's proposed controls including a noise curtain on the block layer and non-tonal alarms for mobile equipment. The wall will include a gap for vehicle access. Exhaust mufflers are also specified for relevant mobile noise sources to alleviate noise impacts. The selected vehicles align with those required have exhaust mufflers in accordance with conditions within works approval W6913/2024/1. Operating hours are also specified as the information provided with the application did not demonstrate that operation outside of these hours will be capable of meeting the Noise Regulations. To ensure noise attenuation measures effectively control noise emissions to comply with the Noise Regulations a noise verification study inclusive of an action plan if noise emissions are not found to comply with the Noise Regulations has been included.

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
	Dust	Pathway: Air/windborne pathway	Commercial/ industrial premises from 20 m from boundary	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	N	Condition 1 Condition 3 Condition 5	The delegated officer considered the dust mitigation measures proposed by the applicant are generally suitable to mitigate dust emissions from vehicle movements within the premises. Relevant operational controls have been included as requirements in the licence. The delegated officer noted that vehicle washing facilities are not available on the premises and that the applicant proposed dry cleaning of vehicles instead with inspection of vehicles to ensure they are free of dust before leaving the premises. Loads will also be covered. The delegated officer deemed it appropriate to include these requirements in the licence to mitigate the risk of dust from the premises activities impacting beyond the premises. The delegated officer noted the applicant is subject ambient dust monitoring and reporting requirements of conditions within works approval W6913/2024/1 and that the monitors are in place and operational.
		Impact: Health and amenity	Residential receptors from 200 m from boundary					
		Pathway: Air / windborne	Vinyard from 50 m from boundary		Impact: crop degradation			
		Pathway: Air / windborne	Bennet Brook and Wetlands from 300 m from boundary		C = Moderate L = Unlikely Medium Risk			
		Impact: elevated pH						

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

Note 3: Conditions 12-15 are all department imposed conditions required for compliance reporting and general complaint and record keeping requirements

4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 19 May 2025	None received	N/A
Local Government Authority, City of Swan advised of proposal on 16 May 2025	None received	N/A
Department of Primary Industries and Regional Development (DPIRD) advised of proposal on 16 May 2025	DPIRD replied on 27 May 2025 recommending: - activities are enclosed; - dust monitoring; - Department of Health (DoH) to be contacted to assess impacts on food standards and impacts to human health from the proposed operations. - piezometer network installed to assess groundwater depth, water quality, flow direction, and velocity, together with enabling a targeted groundwater monitoring program to regularly sample groundwater quality for potential contamination and to assess any change over time. - stormwater drains and detention basins should be regularly tested for alkalinity levels and treated as necessary. DPIRD noted that dust emissions can impact on grapevine quality and physiology. The presence of cement dust can significantly increase the pH of water, making it highly alkaline. If stormwater control measures fail to manage excess water that has come into contact with cement dust, this alkaline water could potentially enter the environment. This could alter the pH of surface water bodies and potentially affect groundwater.	The delegated officer notes that DPIRD's response is the same as the response received 27 June 2024 in response to an advice request from DWER on 16 May 2024 during consultation for W6913/2024/1. The recommendations were considered in the grant and condition setting of the works approval. DWER will liaise with DoH following completion of the establishment of the permanent infrastructure when dust monitoring data is available to better inform DoH's advice. Water management controls are applied in the licence to prevent emission of stormwater or process water to the environment however water monitoring data will be considered in future Environmental Compliance Reports for W6913/2024/1 and applications to amend the Licence (L2938/2025/1)
Department of Planning, Lands and	DPLH replied on 12 June 2025 stating:	DWER's risk assessment has included agricultural receptors

Consultation method	Comments received	Department response
Heritage (DPLH) advised of proposal on 16 May 2025.	The development approval included conditions requiring the submission of a dust management plan and the ongoing control and measurement of dust around the site. These conditions were specifically imposed to protect the surrounding grape growing operations from any negative impacts. The WAPC supports the continued application of such measures, and these should be considered in any further approvals issued for the operation of the approved land uses.	as Sensitive receptors to dust in the risk assessment consistent with DPLH advice.
Applicant was provided with draft documents on 27 June 2025	Applicant replied on 30 June 2025: The response provided additional information and clarifications requested together with the comments details below.	The information and clarifications have been incorporated in the final documents.
	Applicant provided an updated premises boundary for the licence.	The licence has been updated to include the revised boundary and distance to receptors from the boundary were also revised.
	Applicant noted an administrative error in condition 1, item 3, (a), iii, that 30 m ³ should be 300 m ³	The error was corrected from not exceed an aggregate volume of 30 m ³ , to not exceed an aggregate volume of 300 m ³ .
	Requested changes to noise attenuation walls to the north and east to enable vehicle access to the operations. Proposed changes are as follows: - A 5 m wide gap required in the north and east walls to allow trucks access to the hardstand. - Removal of a section of noise wall to the north of the concrete batching plant to enable delivery trucks to access the concrete and spent lime silo. The applicant provided further information to clarify access restrictions for the silos and details of an existing 2.2 m high wall of stored clay tiles located on the northern boundary of the premises (~50 m from the plant) that is considered to provide noise attenuation for the batch plant.	The delegated officer considered the proposed changes were necessary to enable vehicle access to specific areas of the premises. Noting the absence of a noise wall in front of the concrete batching plant consideration was given to whether the existing tile wall is expected to provide noise attenuation for the concrete batching plant. It is considered likely to achieve at least 5 dB reduction, and with other noise controls applied in the works approval is considered a suitable alternate for the proposed noise wall directly north of the plant. The noise wall requirements in the licence were adjusted to reflect these changes and include the existing tile wall.
	Confirmed waste types accepted and advised cracker dust is not a waste.	Cracker dust was removed from waste acceptance Table 2 Condition 2.

5. Decision

Based on the assessment in this report, the delegated officer has determined that the proposal to operate an interim, mobile concrete batching plant, limestone block laying machine and associated infrastructure at the premises does not pose an unacceptable risk of impacts to the environment or public health subject to implementation of the controls specified in the licence.

The determination to grant the licence is based on the following:

- The application does not propose any crushing and/or screening activities with raw materials delivered ready for use in concrete batching.
- Operation and maintenance of the concrete batching plant will be in accordance with the Concrete Batching Regulations.
- The applicant has proposed generally suitable controls for the management of potentially contaminated water and dust.
- Ambient PM₁₀ monitoring stations have been installed to the north and south of the site in accordance with the related works approval W6913/2024/1 and will be operated to confirm effective dust control is implemented on the premises.
- Operation will be limited to daytime hours from 7am to 7pm Monday to Saturday.

In order to mitigate the potential for environmental, amenity or health impacts the applicant's proposed controls have been imposed within the licence as they are considered critical to maintaining an acceptable level of risk. These include:

- Use of installed dust suppression infrastructure, a water cart and a sweeper to minimise dust emission.
- Dust mitigation on stockpiles.
- Clean up of spills.
- Ceasing operation during strong wind conditions.
- Vehicle speed limited to 15 km /hr.
- Restricted to daytime operation.
- Noise attenuation on all mobile equipment.

The delegated officer specified some additional operational requirements relating to the control of contaminated water and dust emissions in alignment with the Concrete Batching Regulations. These included restricting the size of raw material stockpiles and specifying requirements to manage potentially contaminated runoff from the premises activities. Additional noise controls and a requirement to undertake a noise verification study were also specified by the delegated officer to address the potential for exceedance of the Noise Regulations assigned levels at nearby receptors.

The delegated officer notes the applicant is also required to operate the premises in a manner which complies with all requirements of the Concrete Batching Regulations, Noise Regulations, and the Environmental Protection (Unauthorised Discharges) Regulations 2004.

The applicant has a lease agreement for the premises which expires in 2039. The delegated officer has therefore determined in accordance with *Guidance Statement: Licence Duration (DER 2016)* to grant the licence for a period of 10 years.

6. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements. As ongoing monitoring has not been conditioned in the licence there is currently no requirement for annual or biennial reporting.

References

1. Areion Environmental 2025, *Licence Application: Interim mobile batching plant and associated infrastructure*, Perth, Western Australia.
2. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
3. DER 2016, *Guidance Statement: Licence duration, Part V Environmental Protection Act 1986*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
5. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
6. DWER 2025a, *Decision Report: Application for Works Approval W6913/2024/1*, Perth, Western Australia.
7. DWER 2025b, *Works Approval: W6913/2024/1*, Perth, Western Australia.
8. BGC (Australia) Pty Ltd 2025, *Licence application for Midland Brick Blokstone Caversham and supporting documents*, Perth, Western Australia
9. JBS&G 2025, *Limestone Block Manufacturing Facility: Midland Brick, Caversham*, Perth, Western Australia.
10. Lloyd George Acoustics 2025, *Environmental Noise Assessment: Midland Brick Caversham*, Perth, Western Australia.
11. Phoenix Environmental Sciences 2011, *Assessment of the Effect of Traffic Noise on Wetland Birds: Background Study for the Roe Highway Extension Project*. Unpublished report prepared in association with AECOM for South Metro Connect, Perth, WA. https://www.epa.wa.gov.au/sites/default/files/PER_documentation/Effect%20of%20traffic%20noise%20on%20birds%20-%20Appendix%20T_0.pdf cited 12/06/2025.