

URBIS

# CONTAINERS FOR CHANGE CONTAINER REFUND POINT ROLLOUT



# 1.0 CONTAINERS FOR CHANGE OVERVIEW

## 1.1 WHAT IS CONTAINERS FOR CHANGE?

Containers for Change is Western Australia's container deposit scheme that launched on June 2020 to help increase recycling rates and reduce litter.

A 10-cent refund is given for each eligible container, encouraging recycling and creating a cleaner Western Australia for everyone.

The program is an initiative by the State Government of Western Australia, and has been enabled by the *Waste Avoidance and Resource Recovery Amendment (Container Deposit) Act 2019*.

WA is the fifth state or territory to adopt a container deposit scheme, following the lead of South Australia, the Northern Territory, New South Wales, the Australia Capital Territory and Queensland.

Critical to the success of the scheme is the establishment of container refund points – where the public and community groups will be able to exchange their containers for the 10-cent refund.

These container refund points come in different shapes and sizes such as container collection cages, reverse vending machines (RVM), reverse vending centres (RVC) and larger format depots.

## 1.2 WHY DOES IT WORK?

Container deposit schemes work for 3 main reasons:



### Litter Prevention

Traditionally waste has no value to the individual. And while there are many places to dispose of waste responsibly, it is reliant on the individual to do the right thing. Many do, but some don't. By adding a clear reward, it signals to people to take their waste to the right place



### Litter Pickup

We walk by rubbish all the time, and in many cases we assume it's someone else's responsibility. By adding a deposit to the container, someone walking by is likely to acknowledge it's value and pick it up.



### Effective Recycling

By effectively capturing and sorting containers, they are in a much better position to be re-used or recycled.



## 1.3 WHO IS TOMRA?

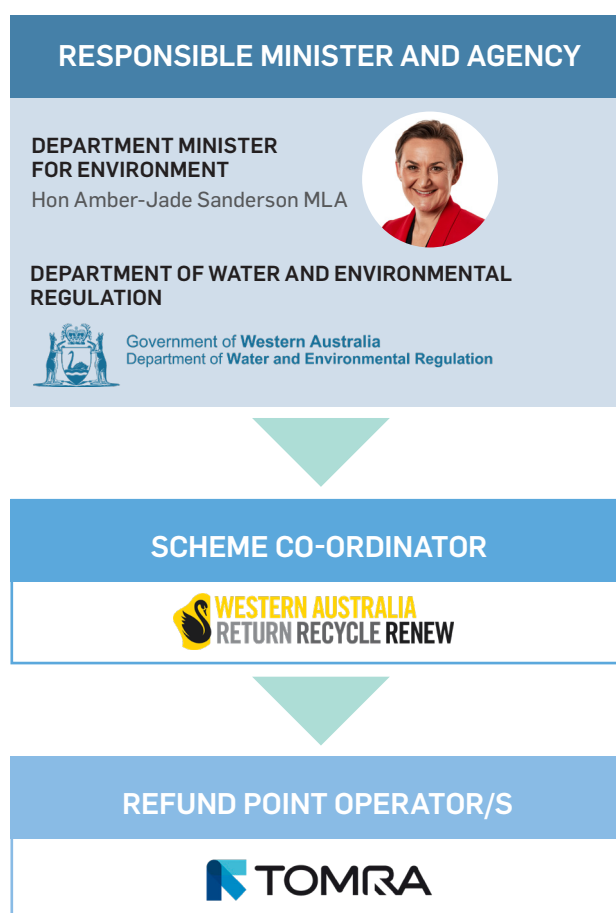
Containers for Change is overseen by the Department of Water and Environmental Regulation.

The scheme itself is co-ordinated and managed by WA Return Recycle Renew Ltd (WARRRL) which is a not-for-profit organisation, following appointment by the Minister for Environment.

WARRRL has appointed TOMRA to install, maintain and manage part of the network of the container refund points.

TOMRA Collection Solutions (part of TOMRA Group) are container refund point operators for the Queensland's Containers for Change scheme, the NSW Return and Earn scheme, and the NT RecyclingNearYou scheme.

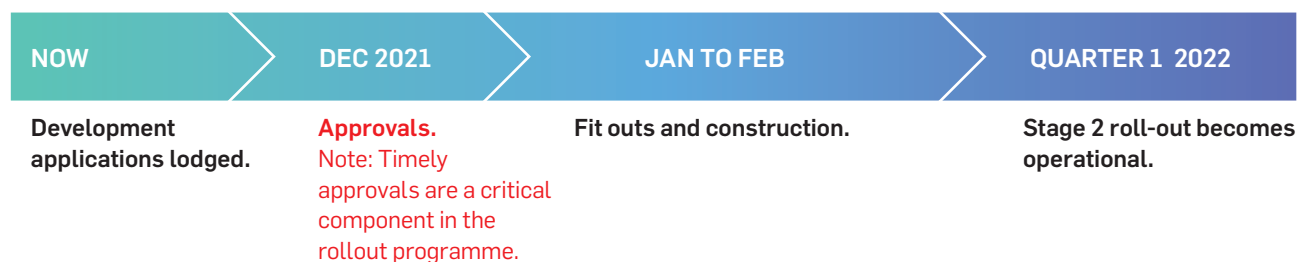
Founded in 1972, TOMRA Group is the world leader in reverse vending machines. Every year the Group's machines accept, recognise and collect 40 billion empty drink containers worldwide. The Group employs approximately 3,400 people globally and is publicly listed on the Oslo Stock Exchange.



## 1.4 TIMELINE

Stage 2 of WA's Containers for Change will commence operation in early 2022.

This requires the timely approval, construction and commencement of the network of container refund points.



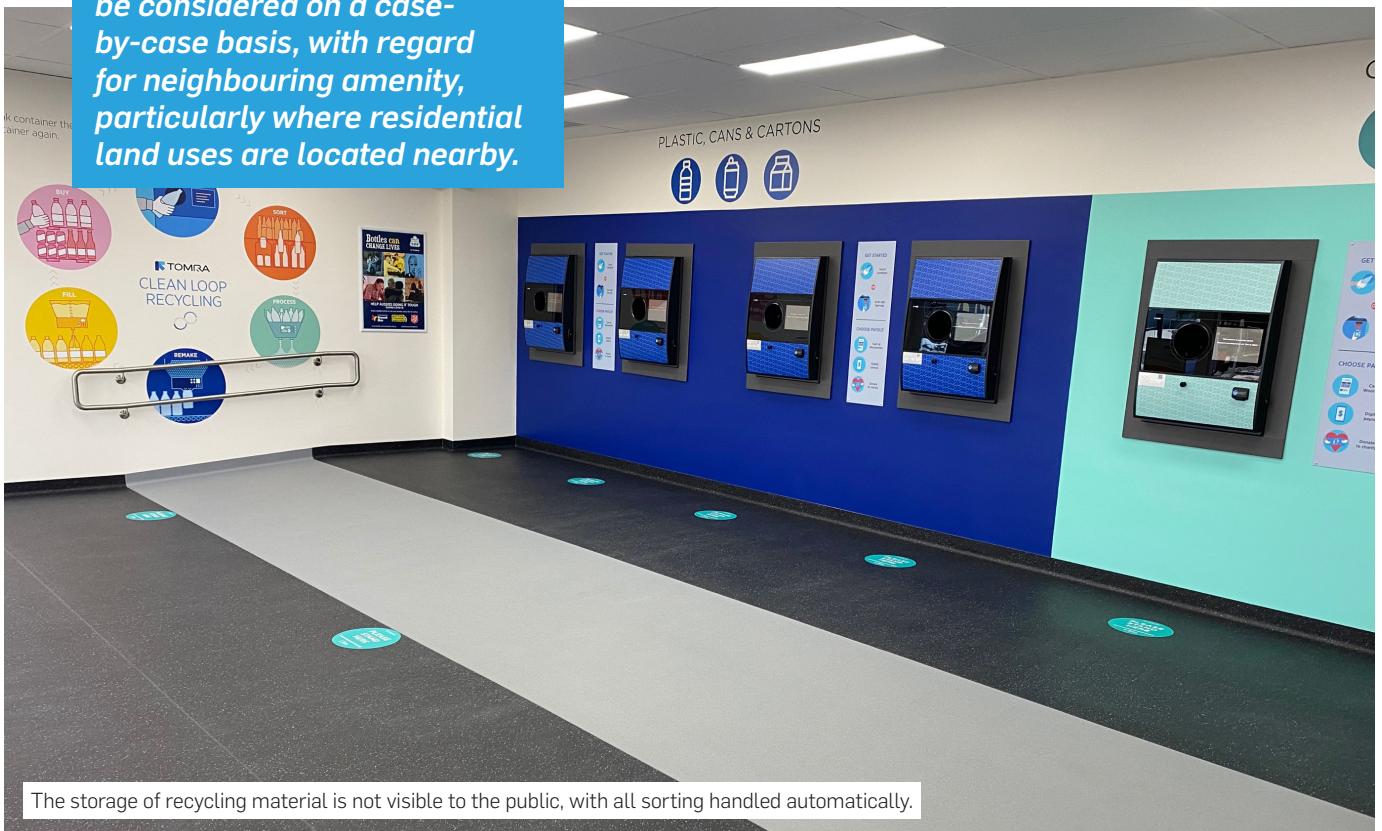
## 1.5 WHAT IS A REVERSE VENDING CENTRE (RVC)

RVCS ARE SMALL-FORMAT CONTAINER REFUND POINTS WHICH PROVIDE A CUSTOMER INTERFACE POINT FOR RETURN, CONSOLIDATION AND TEMPORARY STORAGE AND SORTING OF CONTAINERS. THEIR OPERATING SCALE IS REDUCED IN COMPARISON TO PREVIOUS WA SITES, FUNCTIONING WITHIN A SMALLER STORE FORMAT.

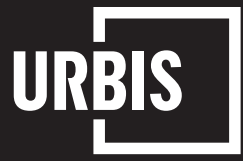


**ACCORDING TO THE DEPARTMENT OF PLANNING, LANDS AND HERITAGE CONTAINER DEPOSIT SCHEME INFRASTRUCTURE POSITION STATEMENT:** *Container deposit recycling centres are suitable for development in mixed business/service commercial and bulky goods areas, along with some commercial and light/service industrial areas. Proposals in centre/shopping/town centre type zones should be considered on a case-by-case basis, with regard for neighbouring amenity, particularly where residential land uses are located nearby.*

This infrastructure incorporates the use of a new or existing retail outlet or shop where participants can deposit individual containers or bags of containers. They are typically located within existing retail and commercial areas.



The storage of recycling material is not visible to the public, with all sorting handled automatically.



# 1. SITE OVERVIEW

Table 1 outlines the subject site's details.

Table 1 Site Overview

Data	Information	Comment
Address	4/7 Honeybee Parade, Banksia Grove	
Lot & Plan	Lot 138 on Plan P418857 <b>Refer Figure 3</b>	The Certificate of Title for the affected property is included at <b>Appendix A</b> .
Lot Area	8,719sq.m	The proposed use will occupy an existing building within the site with a floor area of approximately 395 sqm.
Site and Surrounds	The site has four street frontages, Honeybee Parade, Jewel Way, Pinjar Road and Porrecta Link. The site is incorporated into the town centre. A fuel station is located on the same lot as RVC <b>Refer Figure 1 and 2</b>	The site is highly accessible by car as the site is close to the Pinjar Road and Joondalup Drive intersection. The 391 bus route runs along Jewel Way.
MRS Zoning	Zoned 'Urban' <b>Refer to Figure 4</b>	The 'Urban' zone refers to an area in which a range of activities are undertaken, including residential, commercial recreational and light industry. The MRS zoning supports the use of a RVC.
DSP2 Zoning	Zoned 'Urban Development' <b>Refer to Figure 5</b>	The Banksia Grove District Centre Local Structure Plan ASP 65 has been endorsed over the subject site.
Banksia Grove Agreed Structure Plan No. 21a Banksia Grove District Centre Local Structure Plan ASP 65	'Centre Zone' under ASP21a  'Business Precinct' under District Centre Local Structure plan 65 refer to <b>Figure 6</b> .	The District Centre LSP 65 outlines that the 'Business Precinct' should have a range of less intensive commercial activities such as showrooms. The RVC is similar to a commercial use and will have minimal impact to the area.
Site Description	The existing building is relatively new and is a part of the town centre.	There are no notable encumbrances that impact the subject site.

Figure 1 Site Context Plan

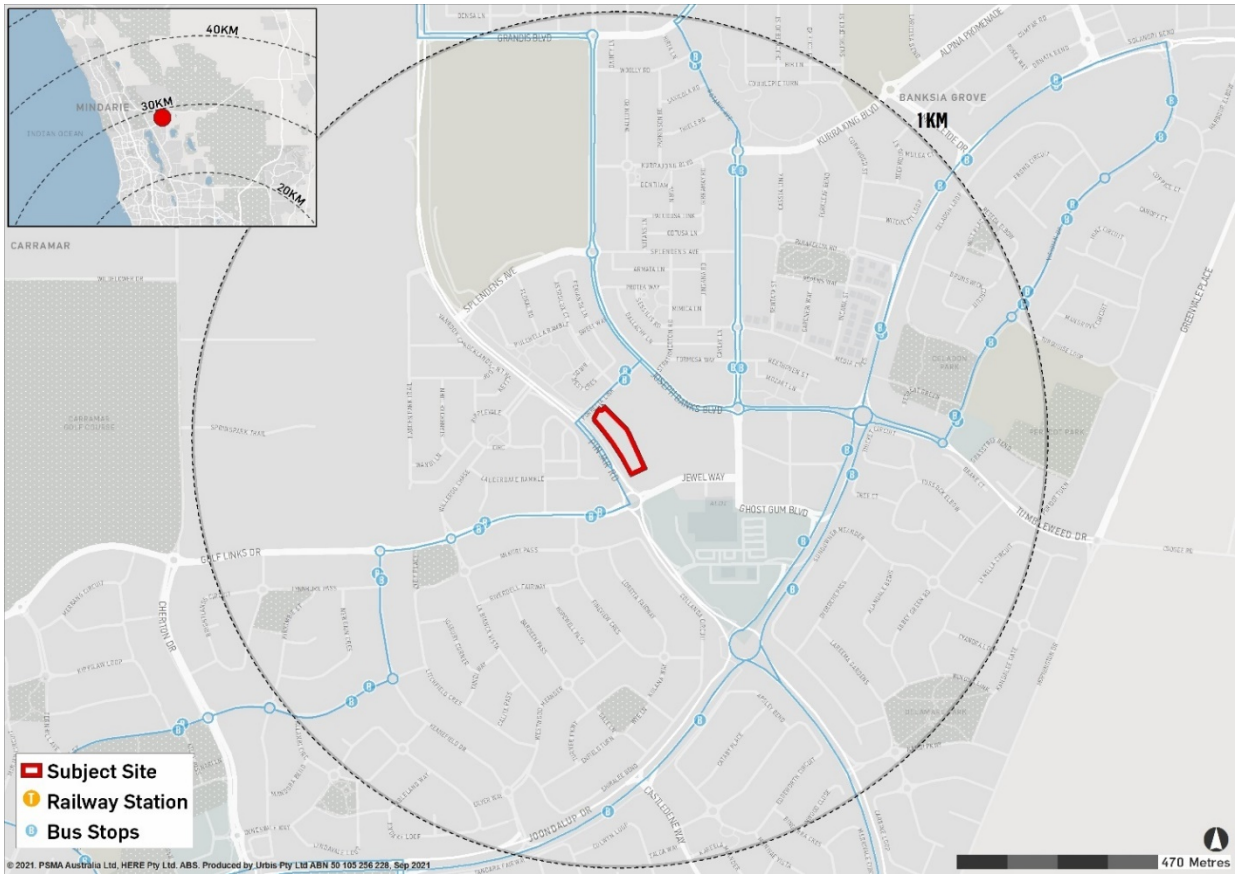


Figure 2 Site Aerial Imagery



Figure 3 Cadastral Plan



Figure 4 Metropolitan Region Scheme





Figure 5 City of Wanneroo District Planning Scheme No. 2 Map

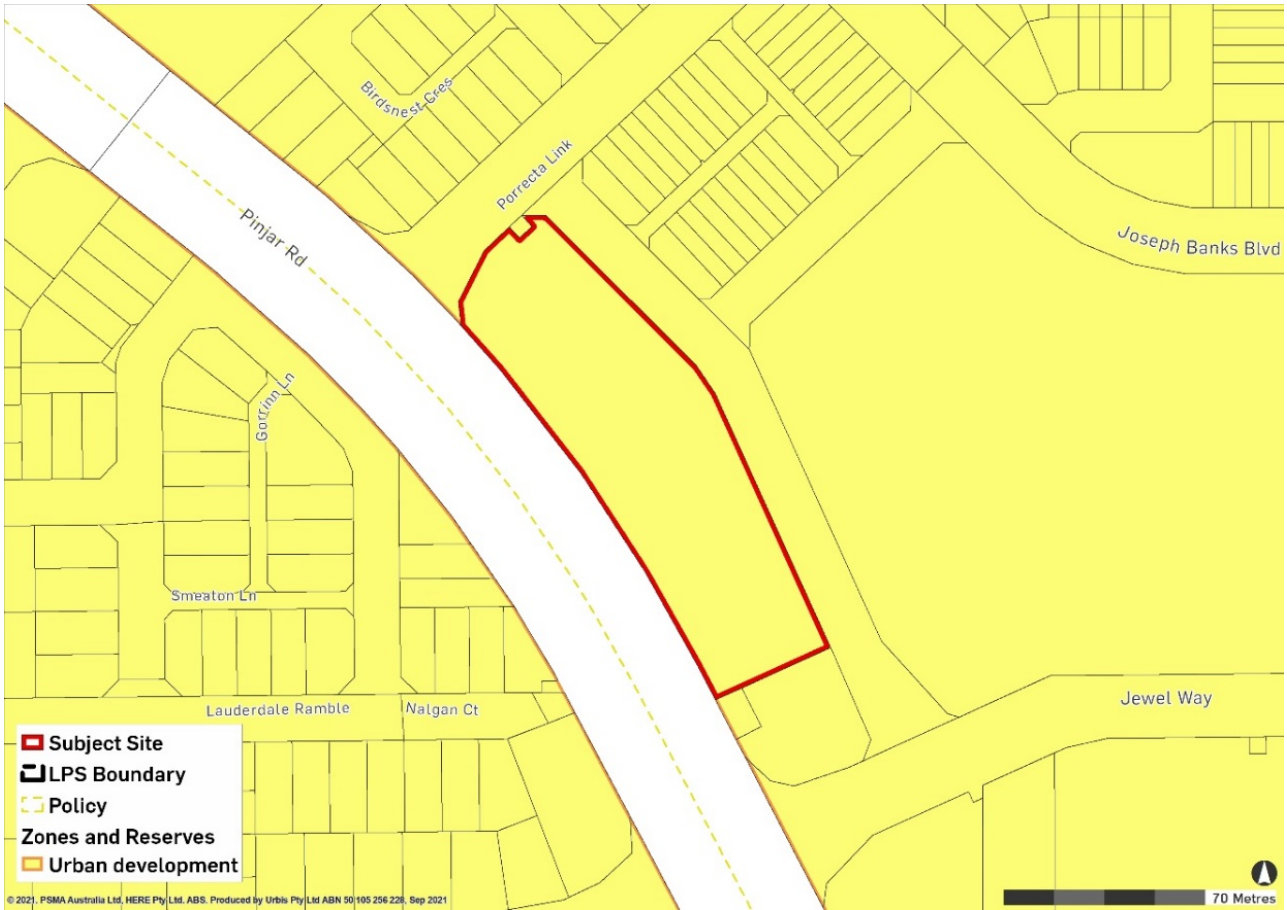
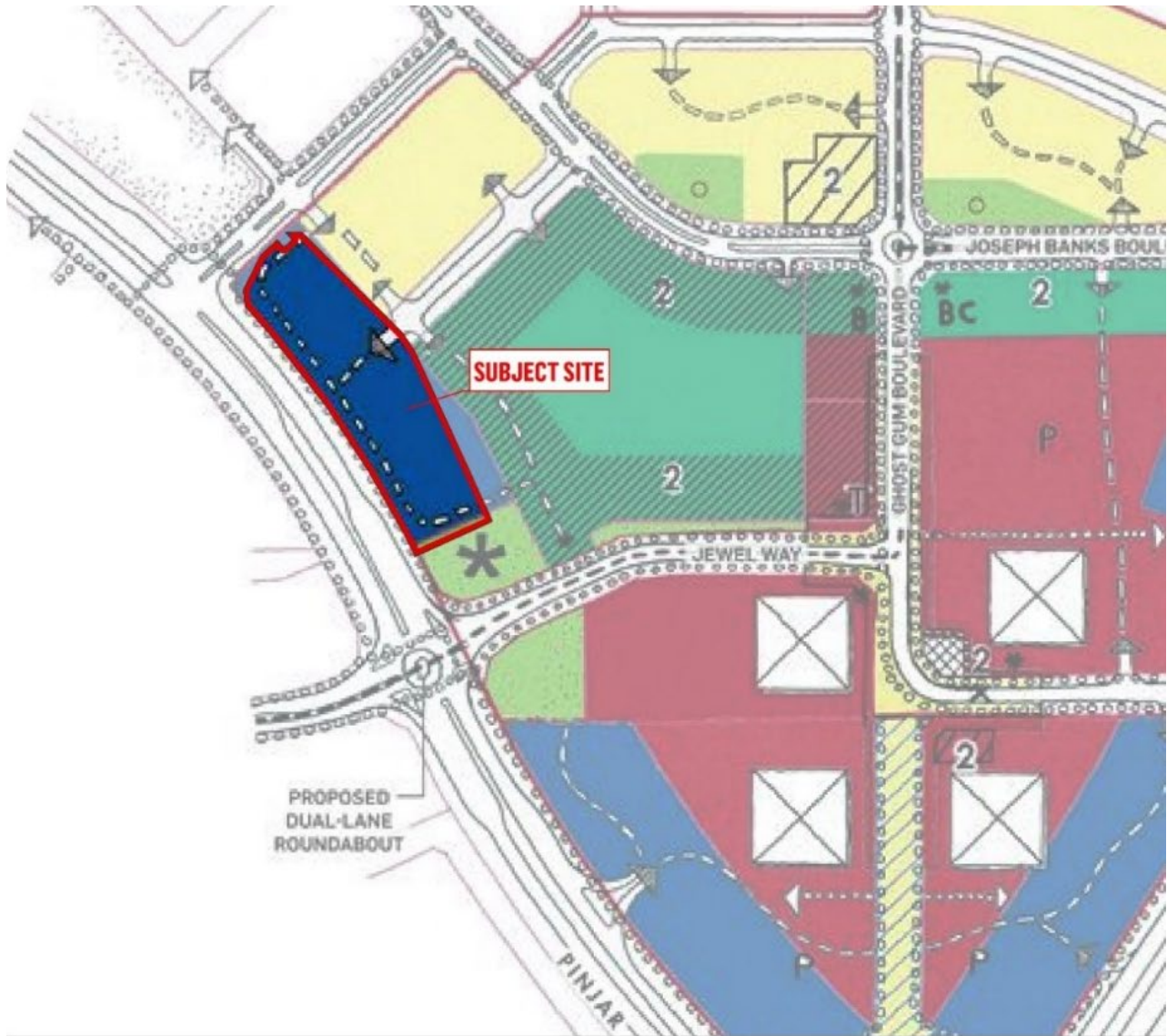













Figure 6 Banksia Grove District Centre Local Structure Plan ASP 65



## BANKSIA GROVE DISTRICT CENTRE - LOCAL STRUCTURE PLAN

<b>LEGEND</b>			
	RETAIL CORE		PRINCIPAL ENTRY POINT TO OFF-STREET PARKING
	RESIDENTIAL PRECINCT		PRIMARY LANDMARK ELEMENT
	BUSINESS PRECINCT		SECONDARY LANDMARK ELEMENT
	MIXED USE PRECINCT		PRINCIPAL PEDESTRIAN ROUTES
	MIXED USE BUILDING TYPOLOGY		INTERNAL VEHICLE CONNECTIVITY
	PARK/STORMWATER MANAGEMENT		

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## 2. PRE-LODGEMENT CONSULTATION

Urbis sought pre-lodgement advice from the City of Wanneroo for this application. The City has confirmed that the application will be treated as a change of use to 'Unlisted Use'. They have confirmed that the application must be advertised for 28 days to owners and occupiers within a 200m radius of the site and to include a sign on site.

We acknowledge that the City has provided initial feedback stating their position on land use, being that the development should be categorised as a 'Unlisted Use'. We appreciate that the typical land use classifications have not been formulated with this type of activity in mind, and the operation of these collection centres are largely uncharted territory in Western Australia. As a result, we have provided a full suite of technical reports to demonstrate that this land use will not impact the amenity of the area, and that operation provides an appropriate transitional use for the site.

This process is in accordance with the position paper which was prepared by State Government as part of the introduction of the Scheme.

Further discussion around the appropriate land use classification is provided in later sections of this report.

### 3. PROPOSAL

This application seeks to accommodate a ‘Containers for Change’ refund point within an existing building. This site will operate as what TOMRA refer to as a ‘Reverse Vending Centre’ (RVC) facility, meaning a small format style refund point. Within the planning framework, this form of a facility is referred to as a ‘Container Deposit Recycling Centre’.

The proposal involves a change of use to the existing tenancy, internal fit out and minor external works including installation of signs. The following table provides a summary of this works, as well as relevant aspects of TOMRA’s operation model.

Refer **Appendix B** – Development Plans

Table 2 Proposal Outline

Data	Information
Area Affected	The operations will be contained within an existing building within the rear portion of the site.
Proposed Land Use	Change of use to ‘Use Not Listed – Container Deposit Recycling Centre’
Size	The existing warehouse building has a floor area of approximately 395 sqm.  The internal fit out for TOMRA’s operations will be as follows: <ul style="list-style-type: none"> <li>▪ Approx. 70 sqm of house area, open to the public.</li> <li>▪ Approx. 312 sqm of back of house area, including the bulk sorting facilities and storage areas.</li> <li>▪ Approx. 10 sqm of amenities and ancillary office space.</li> </ul>
Number of Collection Points	There will be 6 reverse vending machine collection points.
Pedestrian Access	This proposal seeks minor modifications to the building façade include the installation of a pedestrian entry sliding glass door. This new entrance provides direct pedestrian access from the adjacent carpark.
Vehicular Access	Vehicle access to the lot is only available from Honeybee Parade. Service vehicles can access the site via loading bays to the rear of the site. Customers can access the site via an internal driveway through the lot to the front of the site. Vehicles will be able to access the site in a forward gear.
Parking	The site shares 73 existing bays with 2 other adjoining tenancies opposite the site. There are an additional 7 bays with a service station on the lot.
Operational Hours	The RVCs will be operational 7am-7pm Monday to Saturday and 9am-6pm on Sundays.  The site will be unstaffed, however for the first 3 months 1 staff member will be onsite to oversee operations.

<b>Data</b>	<b>Information</b>
Loading / Goods Access	<p>Servicing vehicles will only enter the site Monday to Saturday 7am to 7pm.</p> <p>The existing vehicle crossovers at the loading area are sufficiently wide to enable the proposed design vehicle to enter and exit the site in the forward gear.</p> <p>Servicing and goods access is separated from customer access, occurring from the rear of the tenancy through an isolated goods access.</p>
External Alterations	<p>External building alterations proposed as part of this application are categorised as either:</p> <ul style="list-style-type: none"> <li>▪ Façade works intended to improve the presentation of the building, and create a more customer orientated frontage; or</li> <li>▪ Branding and way finding signage.</li> <li>▪ New automatic sliding glass door for entry</li> <li>▪ New larger roller door at the rear of tenancy.</li> </ul>
Signage	<p>Various signage associated with the 'Containers for Change' branding as scheme coordinator, and 'TOMRA' branding as the site operator.</p>

### 3.1. TECHNICAL CONSIDERATIONS

The following table provides a summary of the supporting technical reports.

Table 3 Technical Considerations

<b>Title</b>	<b>Summary</b>
<p>Traffic Impact Assessment</p> <p>Refer <b>Appendix C</b></p>	<p>The Traffic Impact Assessment has considered and assessed the movement of service vehicles through the site, as well as the suitability of the site to accommodate the TOMRA operations. The assessment has been informed by SLR's recent experience on similar facilities in Western Australia and Southeast Queensland.</p> <p>The swept path assessment showed that the proposed RCV can access and service the tenancy with no internal conflicts and enter &amp; exit Honeybee Parade in the forward gear.</p> <p>The proposed use is projected to generate approximately 60-70 vehicle movements in the peak hour period, being a Sunday morning between 10-11am.</p> <p>The proposed use of the vacant unit is not projected to introduce an unexpected incremental traffic demand such that it will have an impact on the Honeybee Parade accesses or the external road network, particularly Pinjar Road.</p>
<p>Noise Impact Assessment</p> <p>Refer <b>Appendix D</b></p>	<p>The Noise Impact Assessment has assessed the potential noise generating activities of the development, and its impact on nearby noise sensitive development.</p>

<b>Title</b>	<b>Summary</b>
	<p>In considering the noise impacts of the development, it is important to note that the sorting, collection and loading of containers onto collection trucks will occur entirely within the building with the roller door closed.</p> <p>The sorting process is automated with no processing occurring on site.</p> <p>The predictions show that the proposed development as currently documented is expected to comply with the relevant criteria at the most exposed noise receptors, thus confirming the suitability of the site for such development. Further to this conclusion, the report provides some best practice operational recommendations to ensure noise generated from the development is kept to a minimum. These recommendations may be implemented through a condition of approval.</p>

# 4. PLANNING ASSESSMENT

## 4.1. STATE PLANNING POSITION ON CONTAINER DEPOSIT SCHEMES

The state-wide planning legislation and guiding framework surrounding container deposit schemes is continually evolving, in recognition that this type of recycling infrastructure is new to the Western Australian planning framework.

Given successful implementation of the scheme requires coordinated implementation and comprehensive geographical coverage in a short period of time, bilateral support at both the state and local government level is essential. As a result, the state government is continually improving the planning mechanisms surrounding container deposit schemes, with the intent of overcoming planning barriers, and to unlock the local government’s ability to fast track planning approval for these uses.

The following provides a summary of these state government policy and legislation initiatives.

### 4.1.1. WAPC Position Statement – Container Deposit Scheme Infrastructure

The WAPC Position Statement is intended to provide guidance to local government on the approach towards categorising and assessing the various container deposit recycling schemes.

Whilst TOMRA refer to this facility as a ‘Reverse Vending Centre’, it is acknowledged that this operation is distinctly different to the WAPC Position Statement definition of such a facility. Instead, the proposed collection centre is best categorised as a ‘Container Deposit Recycling Centre’ for the following reasons:

- A ‘Reverse Vending Machine’ is smaller, typically in shopping centres and public spaces and are usually incidental to the predominant land uses
- A ‘Container Deposit Recycling Centre’ is solely for the return, sorting and storage of eligible containers, they have a larger turnover of customers and storage than a ‘Reverse Vending Machine’.

Section 5.2.3.6 of the Position Statement provides clear direction on the matters which should be considered for a Container Deposit Recycling Centre. These are addressed in the following table.

Table 4 WAPC Position Statement Assessment Summary

Required	Provided	
<i>Visual appearance – the development should integrate seamlessly with surrounding development, and not propose outdoor sorting or storage which is visible from the public realm.</i>	The development proposes a new automatic sliding glass door to the customer entrance and a new roller door at the rear for service vehicle. The development will retain the rest of the existing exterior of the building.	✓
<i>Onsite operations – generally, only the return, sorting and storage of material associated with the CDS should occur.</i>	All proposed operations relate to the container deposit scheme.	✓
<i>Car parking – parking requirements should have regard for the generally quick turnover of users, and the colocation of such return points with uses where trips are likely to be shared.</i>	Table 6 of this report demonstrates that sufficient parking will continue to be provided within the site.	✓
<i>Car queuing if the proposal is to incorporate a facility for members of the public to drive into the building, to effectively manage vehicles, the development should have designated car</i>	The RVCs operate on a smaller scale and will not incorporate a drive through type drop off. Although the carpark is ample sized with good	N/A

Required	Provided	
<i>queuing much like that provided at a fast food outlet</i>	egress points, the movement of cars within the site will not be an issue.	
<i><u>Distance to Residential</u> a distance of 200m should be maintained from the building in which a centre operates to the boundary of a lot used for residential purposes. A residential purpose means any lot that has a residential component (e.g. mixed use).</i>	Residential development does occur within 200m from the centre, however there is no direct interface to the site and the use will have no further impact than a typical showroom.	<b>N/A</b>

#### 4.1.2. Proposed Deemed Provisions Amendment – Container Deposit Scheme

The WAPC is currently progressing an amendment to Part 7 of the Deemed Provisions of the *Planning and Development (Local Planning Schemes) Regulations 2015* (the Regulations), which provides specific exemptions from planning approval for the ‘containers for change’ infrastructure, including ‘Container Deposit Recycling Centres’.

Advertising of these regulation changes concluded on 7 February 2020, and therefore is considered ‘substantially commence’. Whilst this was not progressed, it still provides relevant guidance on the appropriate design of a container deposit recycling centre.

The specific criteria for exemption from planning approval for a ‘Container Deposit Recycling Centre’ is detailed within Section 61C(2) of the draft Deemed Provisions and is addressed in the following table.

Table 5 Assessment Against Draft Deemed Provisions Amendment

Required	Provided	
<i>61C(2) The use of land to operate a container deposit recycling centre is not exempt from the requirement for development approval unless each of the following conditions is satisfied -</i>		
<i>(a) No part of the land us a heritage protected place;</i>	The subject site is not heritage protected.	✓
<i>(b) No part of the land is in a residential area;</i>	The site is located within the ‘Business Precinct’ under the Structure Plan.	✓
<i>(c) The operation of the centre begins by 2 June 2021;</i>	This is no longer applicable, but the regulations are still being used as a guide for the purpose of development assessment.	<b>N/A</b>
<i>(d) The centre operates in a building which is not within 200m of the boundary of a lot used for residential purposes;</i>	This is no longer applicable, but the regulations are still being used as a guide for the purpose of development assessment.  Residential development does occur within 200m from the centre, however there is no direct residential interface to the site and the use will have no further impact than a typical showroom.	<b>N/A</b>



Required	Provided	
(e) <i>The floor area of the part of the building that is primarily use for the purposes of the centre does not exceed 2,000sq.m;</i>	The floor area of the facility is approximately 395 sqm	✓
(f) <i>For each 100sqm of the floor area of the part of the building that is primarily used for the purposes of the centre, there is on the land at least</i>	These car parking requirements have been applied for the purpose of the car parking assessment in report section 4.5.	✓
(i) <i>1 car parking space; or</i>	Approximately 140m of car queuing area is provided in the site, far exceeding the minimum requirement.	
(ii) <i>A 6m length of car queuing lane.</i>		

## 4.2. CITY OF WANNEROO DISTRICT PLANNING SCHEME NO.2

This proposal is subject to the City of Wanneroo District Planning No.2 (the Scheme) in which it is zoned 'Urban Development'. The 'Urban Development' zone is applied to a site in order to facilitate the provision of a structure plan to guide development and subdivision. All land use permissibility and objectives are delegated to that structure plan. In terms of this site, the relevant structure plans are the Banksia Grove Agreed Structure Plan No. 21a (**SP21A**) and Banksia Grove District Centre Local Structure Plan ASP 65 (**ASP65**).

In consultation with the City and through a review of the scheme, the proposal does not adequately meet the land use definitions provided for in the scheme. As such, it is most appropriate that the proposal be classified as a 'Use Not Listed' as permitted under clause 4.4.2 of the Scheme.

The subject clause enabling a 'Use Not Listed' requires the City to review the proposal on its merit against the subject zoning. In this instance, the proposal is to be assessed under the relevant structure plan provisions.

The proposal's relationship with the scheme and zoning is summarised in table 6 below.

Table 6 District Planning Scheme No.2

Zone	Use	Comment
'Urban Development'	'Use Not Listed – Container Deposit Recycling Centre'	In accordance with the Scheme, the permissibility of any uses, including a 'Use Not Listed', is subject to the provisions of the relevant Structure Plan.

## 4.3. BANKSIA GROVE AGREED STRUCTURE PLAN NO.21A

The Banksia Grove Agreed Structure Plan No.21A (**SP21A**) provides the broad development intent for the Banksia Grove locality. The subject site is within the 'Centre' zone of SP21A, in which a 'Town Centre' environment is alluded to being the desired built form outcome, specialising in Residential, Commercial and Business land uses. An additional local framework to be published to facilitate the development of the Local Centre, in which is discussed in Section 4.4.

The proposal's relationship with SP21A is summarised in the table below.

Table 7 Banksia Grove Agreed Structure Plan No. 21A

Zone	Use	Comment
Centre Zone	'Use Not Listed – Container Deposit Recycling Centre'	The use is not included by the scheme therefore the 'Use Not Listed' is the most appropriate use. This use is not listed in the Structure Plan.

#### 4.4. BANKSIA GROVE DISTRICT STRUCTURE PLAN ASP 65

In response to the provisions of SP21A, the Banksia Grove District Structure Plan ASP 65 (ASP65) has been published to guide development of the Banksia Grove District Centre. ASP65 is divided into land use precincts, in which the subject site is located within the 'Business Precinct' of SP21A. the objective and intent of the 'Business Precinct' is as follows:

*"A range of less intensive commercial activities such as showrooms and service stations along Joondalup Drive and Pinjar Road in the Business Mixed-Use precinct."*

It is this development intent that acts on behalf of cl.4.4.2 of the Scheme to provide a 'zone objective' to assess the proposed 'Use Not Listed – Container Deposit Recycling Centre' against.

Although classified as a 'Use Not Listed', the proposal's functions distinctly align with the intent of the 'Business Precinct'. The proposal's operations reflect the retail trade of showrooms through its 'reverse-shop' container deposit model and the requirement for high-exposure site locations. By being in this location, it is of high exposure to passing trade which is vital for its operation whilst providing an appropriately scaled interface to the developing Banksia Grove Town Centre. Further, container deposit scheme infrastructure has been approved in multiple locations throughout the Perth Metropolitan area in areas of showroom retail and less-intensive commercial.

The proposal's relationship with ASP65 is summarised in the table below.

Table 8 Banksia Grove District Centre Local Structure Plan ASP 65

Zone	Use	Comment
Business Precinct	'Use Not Listed – Container Deposit Recycling Centre'	<p>The use is not included by the scheme therefore the 'Use Not Listed' is the most appropriate use. This use is not listed in the Structure Plan.</p> <p>The proposal meets the objective and intent of the 'Business Precinct' by being a less intensive commercial land use that can appropriately coexist with bulky good showrooms and service station development.</p>

#### 4.5. PARKING ASSESSMENT

As noted in earlier sections of this report, the TOMRA 'Reverse Vending Centre' facility will utilise the shared provision of 73 parking bays throughout the wider approved showroom site.

As the operation of these container deposit scheme infrastructure is unique in its operation, the car parking standards recommended through the draft Regulations have been applied for the assessment. This assessment is presented below in Table 9.

Table 9 – Car Parking Assessment

Land Use	Parking Standard	Area	Bays Required
Existing: Assumed to be Showroom	1 bay per 30 sqm of GFA	395 sqm	13
Proposed: 'Use Not Listed – Container Deposit Recycling Centre'	1 bay per 100sqm of floor area (as per draft Regulations)	395 sqm	3
<b>NET SURPLUS OF</b>			<b>10</b>

## 4.6. SUMMARY OF LOCAL PLANNING POLICIES ASSESSMENT

Table 10 Local Planning Policy Assessment

Local Planning Policy (LPP)	Requirements	Assessment
LPP4.28 – Container Deposit Scheme Infrastructure	LPP4.28 provides a framework for Container Deposit Scheme (CDS) infrastructure	LPP4.28 is not applicable as it refers only to standalone reverse vending machines and container collection cages, not larger tenancy-based operations such as the proposed.
LPP4.6 – Signs	LPP6.2 guides the design and placement of advertisements common in the City.	A detailed assessment of LPP4.6 is in Report Section 4.6.1.

### 4.6.1. Signs Assessment

As previously outlined in earlier sections of this report, the proposal seeks planning approval for signage to align with the change of use to a Reverse Vending Centre.

The following signs as defined by the City of Wanneroo's Local Planning Policy – Signage are proposed:

- 3x Wall Signs
- 1x Pylon Sign (Affixed Ground Based Sign)

Further details for the signs are provided in Appendix B and are assessed under the provisions of the City's Signs Local Planning Policy. Table 11 below outlines the signage assessment as per the City's Signs Local Planning Policy.

Table 11 Signage Assessment

LPP REQUIREMENT	COMPLIANCE
<b>Wall Sign</b>	
<b>P1</b> Not project more than 300mm out from the wall	<b>P1</b> Complies – signs do not project from the wall
<b>P2</b> Be limited to a maximum of 1 sign per tenancy, per street frontage	<b>P2</b> Variation – proposed three wall signs.
<b>P3</b> Not extend beyond the wall	<b>P3</b> Complies – signs do not extend beyond the wall
<b>P4</b> Not exceed 25% in aggregate area on any 1 wall to a maximum of 8sqm	<b>P4</b> Variation – proposed signs of greater than 25% wall aggregate.
<b>P5</b> Be integrated with the building design.	<b>P5</b> Complies – signs are integrated into building design as much as possible given the building is already constructed.
<b>Pylon Sign (Affixed Ground Based Sign)</b>	
<b>P1</b> Be limited to a maximum of one per street frontage or one for every 40 metres of linear street frontage.	<b>P1</b> Complies – the proposed sign is located approximately 40m of from the existing ‘Motor Vehicle Repair’ pylon sign.
<b>P2</b> Not exceed 6 metres in height by 2.5 metres in width.	<b>P2</b> Complies – the proposed sign is 2.0m in height and 2.4m in width.
<b>P3</b> Be located centrally within the lot and no closer than 3 metres to a side boundary.	<b>P3</b> Complies – The sign is centrally located and of a considerable distance further than 3.0m from a side boundary.
<p><b>Justification for Variation</b></p> <p>Seeking variation from this policy is the proposed Wall Signs to be included on the already constructed façade of the subject tenancy. As above, the proposal seeks variation for P2 and P4 of the Wall Sign requirements. The variation request to intensify the signage is due to the need for high exposure to passing trade in order to make the proposal viable, ensuring the site is clearly visible to Armadale Road. As the site’s do not ‘sell’ a good, but rather offer a State Government initiative, it is integral to their success that their visibility is maximised to enable increased visitation and the ability for local residents to identify its location for future visits.</p> <p>Further to its operational requirement, the proposed wall signage is not detrimental to the locality or wider service commercial area. The signage does not include any illumination other than what is currently on site and is compliant from a materiality and artwork perspective.</p>	

## 4.7. SUMMARY OF PLANNING ASSESSMENT

The following table provides a summary and conclusions of the detailed planning assessment.

Table 12 Planning Assessment

Data	Information	Comment
Proposed Land Use and Permissibility	<p>The proposed facility is best described as a 'Use Not Listed – Container Deposit Recycling Centre'.</p> <p>Clause 4.2.2 of the Scheme enables the City to consider the 'Use Not Listed - Container Deposit Recycling Centre' as either a permitted, discretionary or prohibited use, following an assessment against the objectives of the zone. The zone in this instance is the 'Business Precinct' from ASP65</p>	<p>The Container Deposit Recycling Centre provides a notable improvement from the existing Showroom operations. Most notably, the proposed use provides a large format, customer orientated activity with a significantly improved facade.</p> <p>The proposal meets the objective and intent of the 'Business Precinct' by being a less intensive commercial land use that can appropriately coexist with bulky good showrooms and service station development.</p> <p>As a result, the facility is entirely consistent with the City's objectives for the Business Precinct in the Banksia Grove District Centre ASP and capable of approval.</p>
Parking	<p>The 'Container Deposit Recycling Centre' is not a use listed in the City's policy framework. As a result, the car parking standards of proposed through Section 61C of the draft Deemed Provisions have been applied.</p>	<p>As demonstrated in Table 6, the proposal provides sufficient parking for the proposed TOMRA operations.</p>
Signage consideration	<p>A signage assessment has been provided in <b>Table 11</b>.</p>	<p>Signage largely complies with the LPP with certain variations requested. The design is integrated into the building and is essential for wayfinding for a building of this scale.</p>

## 5. CONCLUSION

A summary of the findings and conclusions of this report are as follows:

- Taking direction from the WAPC's Position Statement, the operation is best classified as a 'Use Not Listed – Container Deposit Recycling Scheme'. Most notably, as there is no manufacturing component to the use, the operation should not be classified as any sub-category of the industry land use.
- All technical reports supporting this development have demonstrated that the container deposit scheme infrastructure does not have significant amenity impacts to the locality. Specifically, these technical findings are as follows:
  - The proposed use is projected to generate approximately 60-70 vehicle movements in the peak hour period, being a Sunday morning between 10-11am. As this peak period occurs outside of the typical road network peak period, the operation will not test the capacity of the existing road network.
  - TOMRA's standard operational controls ensure that the facility will contain the majority of noise and odour impacts within the back of house area. Most notably, all storage and transfer of materials will occur within the building, with the roller doors shut.
- Based on the parking standards of the draft Regulations and recent experience with similar development, the development provides sufficient car parking on site.
- The subject site meets all the criteria for an exemption from planning approval under the draft Regulations. This demonstrates that the operation is entirely appropriate for its context, and any available discretion should be exercised in favour of this development.

Ultimately, the proposed development will help deliver a facility which encourages community recycling and not adversely affect the amenity of the existing area. The proposal is in line with the City's vision for the Banksia Grove District Centre.

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