

8.2 M & N BAKSAJ - MATERIAL CHANGE OF USE - TRANSPORT DEPOT - LOT 9 ON SP210185 - SHABAN CLOSE, MAREEBA - MCU/18/0025

Date Prepared: 2 January 2019
Author: Senior Planner
Attachments: 1. Proposal Plans [↓](#)

APPLICATION DETAILS

APPLICATION		PREMISES	
APPLICANT	M & N Baksaj	ADDRESS	Shaban Close, Mareeba
DATE LODGED	13 August 2018	RPD	Lot 9 on SP210185
TYPE OF APPROVAL	Development Permit		
PROPOSED DEVELOPMENT	Material Change of Use - Transport Depot		
FILE NO	MCU/18/0025	AREA	2.492 hectares
LODGED BY	Freshwater Planning Pty Ltd	OWNER	M & N Baksaj
PLANNING SCHEME	Mareeba Shire Council Planning Scheme 2016		
ZONE	Rural Residential zone - Precinct C		
LEVEL OF ASSESSMENT	Code Assessment		
SUBMISSIONS	n/a		

EXECUTIVE SUMMARY

Council is in receipt of a development application described in the above application details.

The application is code assessable and was not required to undergo public notification.

It has been assessed against the relevant statutory planning instruments, including the Regional Plan and the Planning Scheme and does not conflict with any relevant planning instrument.

The key issue of the proposed development is ensuring that it does not detrimentally affect the amenity of the immediate area. This has been achieved through the imposition of reasonable conditions to require the establishment of a landscape buffer and through the limiting hours of operation.

It is recommended that the application be approved in full with conditions.

OFFICER’S RECOMMENDATION

1. That in relation to the following development application:

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PROPOSED DEVELOPMENT	Material Change of Use - Transport Depot		

and in accordance with the Planning Act 2016, the applicant be notified that the application for a development permit for the development specified in (A) is:

Approved by Council in accordance with the approved plans/documents listed in (B), subject to assessment manager conditions in (C), assessment manager’s advice in (D), relevant period in (E), further permits in (F), and further approvals from Council listed in (G);

And

The assessment manager does not consider that the assessment manager’s decision conflicts with a relevant instrument.

APPROVED DEVELOPMENT: Development permit for Material Change of Use - Transport Depot(B)

APPROVED PLANS:

Plan/Document Number	Plan/Document Title	Prepared by	Dated
n/a	Site Plan	M & N Baksaj	n/a
n/a	Shed Elevations - 1	M & N Baksaj	n/a
n/a	Shed Elevations - 2	M & N Baksaj	n/a
n/a	Proposed Fencing Plan	M & N Baksaj	10 October 2018
n/a	Garden Design for Michael Baksaj	Rosemary Williams	2 October 2018
n/a	Landscape Design for Michael Baksaj	Rosemary Williams	1 October 2018

(C) ASSESSMENT MANAGER’S CONDITIONS (COUNCIL)

(a) Development assessable against the Planning Scheme

1. Development must be carried out generally in accordance with the approved plans and the facts and circumstances of the use as submitted with the application, including but not necessarily limited to the subject of any alterations:

- found necessary by Council's delegated officer at the time of examination of the engineering plans or during construction of the development because of particular engineering requirements; and
 - to ensure compliance with the following conditions of approval.
2. Timing of Effect
- 2.1 The conditions of the development permit must be complied with to the satisfaction of Council's delegated officer prior to the commencement of the use except where specified otherwise in these conditions of approval.
- 2.2 Prior to the commencement of use, the applicant must notify Council that all the conditions of the development permit have been complied with, except where specified otherwise in these conditions of approval.
3. General
- 3.1 The applicant/developer is responsible for the cost of necessary alterations to existing public utility mains, services or installations required by works in relation to the proposed development or any works required by condition(s) of this approval.
- 3.2 All external works must be designed, constructed and carried out in accordance with FNQROC Development Manual requirements (as amended) and to the satisfaction of Council's delegated officer.
- 3.3 Waste Management
- On site refuse storage area must be provided and be screened from view from adjoining properties and road reserve by 1 metre wide landscaped screening buffer or 1.8m high solid fence or building.
- 3.4 Limitations on ancillary maintenance
- On site maintenance of vehicles associated with the transport depot use is to be limited to changing of flat tyres and greasing of vehicles.
- 3.5 Hours of Operation
- The hours of operation for the approved use shall be limited to the hours between 6:00am to 5:30pm Monday to Friday. No activities associated with the approved use are permitted on Saturdays, Sundays or Public Holidays.
- 3.6 Any fuel stored on site associated with the approved use (other than in the buses) must be kept in a sealed, bunded area with a storage capacity of at least 150% of the storage capacity of any fuel storage tanks/containers.
- 3.7 Building Materials and Finishes
- All building materials and finishes, including roofing iron/tiles, guttering, external blockwork/render and window screening structures must be made from non-reflective, modern building materials and must be of a neutral colour, to the satisfaction of Council's delegated officer.

4. Infrastructure Services and Standards

4.1 Access

An asphalt heavy duty access crossover with dimensions suitable for the proposed school buses, must be constructed (from the edge of Shaban Close to the property boundary of the subject land) in accordance with the FNQROC Development Manual, to the satisfaction of Council's delegated officer.

4.2 Stormwater Drainage/Water Quality

4.2.1 The applicant/developer must take all necessary steps to ensure a non-worsening effect on surrounding land as a consequence of the development.

4.2.2 All stormwater drainage concentrated by the development must be collected from site and discharged to an approved legal point of discharge.

4.3 Carparking/Internal Driveways

All car parking and trafficable areas associated with the approved use, must be asphalt or concrete surface treated and maintained for the life of the development, to the satisfaction of Council's delegated officer.

4.4 Environmental Management

4.4.1 Any material likely to degrade the water (e.g. oils, lubricants, solvents, coolants, degreasing agents etc) must be stored within a bunded area, or an appropriately designed chemical storage container, suitable for preventing the escape of material into surface or underground water resources.

4.4.2 All waste products associated with the approved use including tyres, wheels, fluids (lubricants, fuels, solvents, coolants, degreasing agents etc.) must be disposed of off-site and must not be stored on site for more than two (2) weeks, to the satisfaction of Council's delegated officer.

4.5 Landscaping/Visual Screening

Within three (3) months of this approval taking effect, the applicant/developer must establish the landscape buffer generally in accordance with the Landscape Designs for Michael Baksaj dated 1 & 2 October 2018 by Rosemary Williams Landscape Consultant.

The landscaping of the site must be carried out in accordance with the endorsed landscape plan and mulched, irrigated and maintained to the satisfaction of Council's delegated officer.

All landscaping must be maintained for the life of the development.

4.6 Lighting

4.6.1 Where outdoor lighting is required the developer shall locate, design and install lighting which prevents the potential for light spillage to cause nuisance to neighbours and must be provided in accordance with Australian Standard 1158.1 – Lighting for Roads and Public Spaces.

4.6.2 Illumination resulting from direct, reflected or other incidental light emanating from the subject land does not exceed 8 lux when measured at any point 1.5m outside the property boundary of the subject site. The lighting fixtures installed on site must meet appropriate lux levels as documented within Australian Standard 4282 – Control of the Obtrusive Effects of Outdoor Lighting.

5. Additional Payment Condition/s (section 130 of the Planning Act 2016)
 - 5.1 The additional payment condition has been imposed as the development will create additional demand on trunk infrastructure which will create additional trunk infrastructure costs for council.
 - 5.2 The developer must pay \$4,545.00 as a contribution toward trunk infrastructure with the amount of the contribution increased on 1 July each year in accordance with the increase for the PPI index for the period starting on the day the development approval takes effect, adjusted by reference to the 3-yearly PPI index average to the date of payment.
 - 5.3 The trunk infrastructure for which the payment is required is:
 - The trunk transport infrastructure servicing the land
 - 5.4 The developer may elect to provide part of the trunk infrastructure instead of making the payment.
 - 5.5 If the developer elects to provide part of the trunk infrastructure the developer must:
 - Discuss with Council's delegated officer the part of the works to be undertaken;
 - Obtain the necessary approvals for the part of the works;
 - Indemnify the Council in relation to any actions, suits or demands relating to or arising from the works;
 - Take out joint insurance in the name of the Council and the developer in the sum of \$20,000,000 in relation to the undertaking of the works;
 - Comply with the reasonable direction of Council officers in relation to the completion of the works;
 - Complete the works to the standards required by the Council.

(D) ASSESSMENT MANAGER'S ADVICE

- (a) A number of other charges or payments may be payable as conditions of approval. The applicable fee is set out in Council's Fees & Charges Schedule for each respective financial year.
- (b) The change in the use of the building may also require a change in the classification of the building under the Building Act. You are advised to contact a Building Certifier to establish if a change in the classification of the building is required.
- (c) Compliance with applicable codes/policies
The development must be carried out to ensure compliance with the provisions of Council's Local Laws, Planning Scheme Policies, Planning Scheme and Planning Scheme Codes to the extent they have not been varied by a condition of this approval.
- (d) Compliance with Acts and Regulations
The erection and use of the building must comply with the Building Act and all other relevant Acts, Regulations and Laws, and these approval conditions.

(e) Environmental Protection and Biodiversity Conservation Act 1999

The applicant is advised that referral may be required under the *Environmental Protection and Biodiversity Conservation Act 1999* if the proposed activities are likely to have a significant impact on a matter of national environmental significance. Further information on these matters can be obtained from www.environment.gov.au.

(f) Cultural Heritage

In carrying out the activity the applicant must take all reasonable and practicable measures to ensure that no harm is done to Aboriginal cultural heritage (the “cultural heritage duty of care”). The applicant will comply with the cultural heritage duty of care if the applicant acts in accordance with gazetted cultural heritage duty of care guidelines. An assessment of the proposed activity against the duty of care guidelines will determine whether or to what extent Aboriginal cultural heritage may be harmed by the activity. Further information on cultural heritage, together with a copy of the duty of care guidelines and cultural heritage search forms, may be obtained from www.datsip.qld.gov.au.

(E) RELEVANT PERIOD

When approval lapses if development not started (s.85)

- Material Change of Use – six (6) years (starting the day the approval takes effect);

(F) OTHER NECESSARY DEVELOPMENT PERMITS AND/OR COMPLIANCE PERMITS

- Development Permit for Building Work

(G) OTHER APPROVALS REQUIRED FROM COUNCIL

- Access approval arising from condition number 4.1 (Please contact Planning Section to obtain application form and applicable fee)

THE SITE

The subject site is situated on Shaban Close, Mareeba and is described as Lot 9 on SP210182. The site is generally rectangular in shape with an area of 2.492 hectares and is zoned Rural Residential under the Mareeba Shire Council Planning Scheme 2016.

The site has frontage of approximately 94 metres to Shaban Close which is constructed to 5.5 to 6 metre wide bitumen sealed standard. Earth table drains are constructed along both sides of Shaban Close. Access to and from Shaban Close is gained via a pipe culvert situated generally in the centre of the site's frontage.

The site is improved by a 120m² dwelling house located in the north-eastern corner. The remainder of the site is flat retaining a scattering of trees over its southern half.

Surrounding properties are zoned rural residential and have been developed for rural residential living purposes.



Map Disclaimer:

Based on or contains data provided by the State of Queensland (Department of Environment and Resource Management) (2009). In consideration of the State permitting use of this data you acknowledge and agree that the State gives no warranty in relation to the data (including accuracy, reliability, completeness, currency or suitability) and accepts no liability (including without limitation, liability in negligence) for any loss, damage or costs (including consequential damage) relating to any use of the data. Data must not be used for direct marketing or be used in breach of the privacy laws.



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BACKGROUND AND CONTEXT

Nil

PREVIOUS APPLICATIONS & APPROVALS

Nil

DESCRIPTION OF PROPOSED DEVELOPMENT

The development application seeks a Development Permit for Material Change of Use - Transport Depot in accordance with the plans shown in **Attachment 1**.

The application includes the following outline of the proposed development:

"A Development Permit for a Material Change of Use is sought to facilitate the construction of Transport Depot over the site. The proposed development will provide parking for a total of four (4) school buses over the property. The construction of a Transport Depot approximately 21 metres x 20 metres as per provided on the Proposal Plans is required to house the buses. The location of the proposed Depot is to be erected in front of the existing structure.

The proponents have provided Freshwater Planning Pty Ltd with the following outline of the general day to day running of the Transport Depot.

The proposal is to house a total of four (4) buses over the property with one (1) bus provided as a spare vehicle and would not be used unless it had to; Two (2) buses would leave the property at approx. 6.40am and 7.15am returning at 9.00am. The same two buses would again leave at 2.40pm returning at 4.30pm and 4.50pm to end the school day; The last (4th) bus leaves from Dimbulah, picking up school kids along the way taking them to school in Mareeba. This bus departs from Mareeba in the afternoon returning to Dimbulah. This bus stays in Dimbulah overnight so only needs to be kept at the proposed Transport Depot between the hours of 9.00pm and 3.00pm on school days.

A total of two staff need to attend the site to access the buses. No customers or other members of the public need to access the block for any reason what so ever for the day to day running of the business.

The proponents have also informed Freshwater Planning Pty Ltd that they have undertaken discussions with the adjoining and adjacent neighbours noting that 'the owners on the eastern boundary are fine with having the buses next door; The owner of the property on the western boundary lives in Melbourne of which I have informed him about the buses and he said he doesn't have an issue; The neighbour directly across the road also does not have an issue with the buses. I have had discussions with many other people living on Shaban Close and they have all said the buses are not an issue. The proposal is definitely only going to be used as a storage facility and not a workshop for the buses'. In relation to the possible noise of the proposed Use the proponents note that 'Audibly, the only noise is buses leaving and entering the property. Surrounding and other properties house are generally not too close to the road. Also, I believe most people are either at work or school etc... at most occasions when the buses are leaving or returning, except for the two morning starts which leave at 6.40am and 7.15 am.'

The site contains frontage to the existing Road Network, being Shaban Close with no change to the existing crossover required. The site is connected to all available services and provided with the necessary services with the proposed development connecting to these provided services. The site is large enough to ensure the appropriate disposal of stormwater occurs.

The proposed development is for the construction of a Transport Depot within Mareeba ensuring that the day to day needs and services of Mareeba and surrounding Townships are met by providing a transport service so that residents can access appropriate education services. This helps to cement Mareeba as a Major Urban Area and Regional Centre of the Tablelands while providing a much needed and relied upon service within the Township."

REGIONAL PLAN DESIGNATION

The subject site is included within the Rural Living Area land use category in the Far North Queensland Regional Plan 2009-2031. Mareeba is identified as a Major Regional Activity Centre in the Regional Plan. The Regional Plan Map 3- 'Areas of Ecological Significance' also identifies the site is:

- *Terrestrial Area of General Ecological Significance*

PLANNING SCHEME DESIGNATIONS

- | | |
|----------------------|--|
| Strategic Framework: | <ul style="list-style-type: none"> • Land Use Categories |
| Zone: | <ul style="list-style-type: none"> • Rural Residential Area |
| Overlays: | <ul style="list-style-type: none"> Rural Residential zone - Precinct C Airport environs overlay Bushfire hazard overlay Environmental significance overlay Flood hazard overlay Hill and slope overlay Transport infrastructure overlay |

Planning Scheme Definitions

The proposed use is defined as:-

Column 1 Use	Column 2 Definition	Column 3 Examples include	Column 4 Does not include the following examples
<i>Transport depot</i>	<i>Premises used for the storage, for commercial or public purposes, of more than one motor vehicle. The use includes premises for the storage of taxis, buses, trucks, heavy machinery and uses of a like nature. The term may include the ancillary servicing, repair and cleaning of vehicles stored on the premises.</i>	<i>Contractor's depot, bus depot, truck yard, heavy machinery yard</i>	<i>Home based business, warehouse, low impact industry, service industry</i>

RELEVANT PLANNING INSTRUMENTS

Assessment of the proposed development against the relevant planning instruments is summarised as follows:-

(A) Far North Queensland Regional Plan 2009-2031

Separate assessment against the Regional Plan is not required because the Mareeba Shire Council Planning Scheme appropriately advances the Far North Queensland Regional Plan 2009-2031, as it applies to the planning scheme area.

(B) State Planning Policy

Separate assessment against the State Planning Policy (SPP) is not required because the Mareeba Shire Council Planning Scheme appropriately integrates all relevant aspects of the SPP.

(C) Mareeba Shire Council Planning Scheme 2016

Relevant Developments Codes

The following Development Codes are considered to be applicable to the assessment of the application:

- 6.2.10 Rural residential zone code
- 8.2.2 Airport environs overlay code
- 8.2.3 Bushfire hazard overlay code
- 8.2.12 Transport infrastructure overlay code
- 9.3.5 Industrial activities code
- 9.4.2 Landscaping code
- 9.4.3 Parking and access code
- 9.4.5 Works, services and infrastructure code

The application included a planning report and assessment against the planning scheme. An officer assessment has found that the application satisfies the relevant acceptable outcomes (or performance outcomes where no acceptable outcome applies) of the relevant codes set out below, provided reasonable and relevant conditions are attached to any approval.

Relevant Codes	Comments
Rural residential zone code	<p>The application can be conditioned to comply with the relevant acceptable outcomes contained within the code apart from the following:</p> <ul style="list-style-type: none"> ▪ Performance Outcome PO8, Acceptable Outcome AO8 ▪ Performance Outcome PO9, Acceptable Outcome AO9 <p>The applicant has demonstrated compliance with the higher order Performance Outcomes PO8 and PO9 of the Rural Residential Zone Code.</p> <p>Further details are provided as the end of this report.</p>

The standard transport infrastructure contribution of \$4,585.00 equates to a total annual vehicle movements of 3,650 (10vpd x 365 days).

The additional traffic generated by this development represents $0.9912 \times \$4,585.00$ or \$4,545.00.

The developer must pay a one off payment of **\$4,545.00** as a contribution toward trunk infrastructure with the amount of the contribution increased on 1 July each year in accordance with the increase for the PPI index for the period starting on the day the development approval takes effect, adjusted by reference to the 3-yearly PPI index average to the date of payment.

The trunk infrastructure for which the payment is required is:

- The trunk transport infrastructure servicing the land

REFERRAL AGENCY

This application did not trigger a referral under Schedule 10 of the *Planning Regulation 2017*.

Internal Consultation

Technical Services

PLANNING DISCUSSION

Compliance with the Performance Outcomes of the Rural Residential Zone Code is summarised as follows:

Rural Residential Zone Code

PO8

Non-residential development:

- is consistent with the scale of existing development;*
- does not detract from the amenity of nearby residential uses;*
- does not impact on the orderly provision of non-residential development in other locations in the shire; and*
- directly supports the day to day needs of the immediate residential community; or*
- has a direct relationship to the land on which the use is proposed.*

A08

No acceptable outcome is provided.

Comment

The proposed transport depot is non-residential development.

The proposed bus shelter shed measures 20m by 21m (420m²), varying in height from 4.2m on the western side to 6m on the eastern side. The scale is governed by the need to house 4 school buses and is sufficient to do this without being unnecessarily larger. The proposed bus shelter shed will be less than half the area of an established shed at 63 Shaban Close.

There are multiple transport depot uses established within 1 kilometre of the subject land. These include:

- 297 Ray Road - buses
- 284 Ray Road - prime movers & trailers
- 24 Shaban Close - prime movers & trailers

The amenity of the locality will be maintained through appropriate landscaping, building colours and the typical hours of operation.

The proposed development will not impact on the orderly provision of other non-residential development.

The proposed use supports the day to day needs of the Mareeba township through the provision of essential public transport, namely the transportation of school children.

The applicants, and owners of the school buses will reside on the subject land.

The development complies with PO8

PO9

Development must not detract from the amenity of the local area, having regard to:

- (a) *noise;*
- (b) *hours of operation;*
- (c) *traffic;*
- (d) *advertising devices;*
- (e) *visual amenity;*
- (f) *privacy;*
- (g) *lighting;*
- (h) *odour; and*
- (i) *emissions.*

AO9

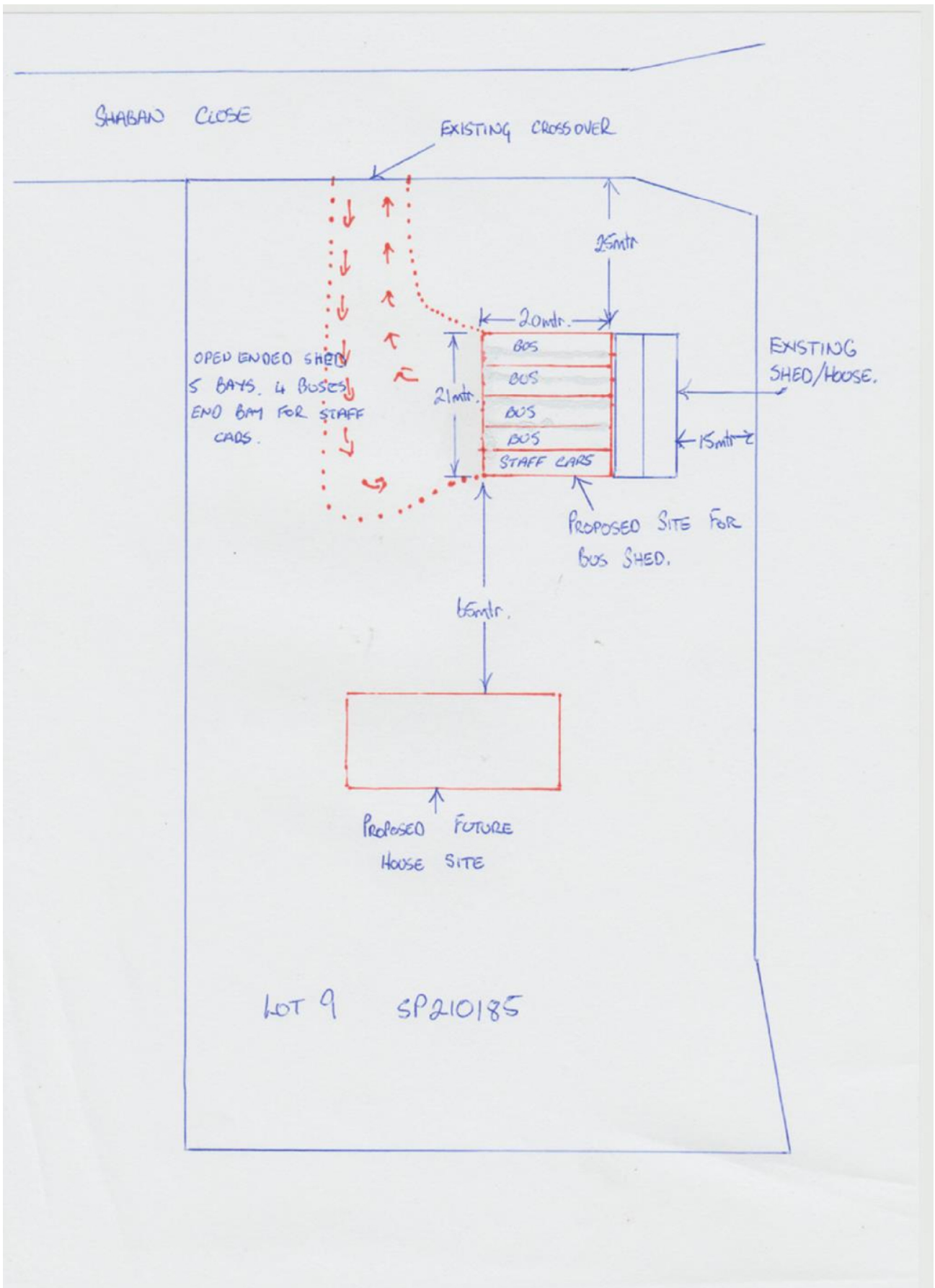
No acceptable outcome is provided

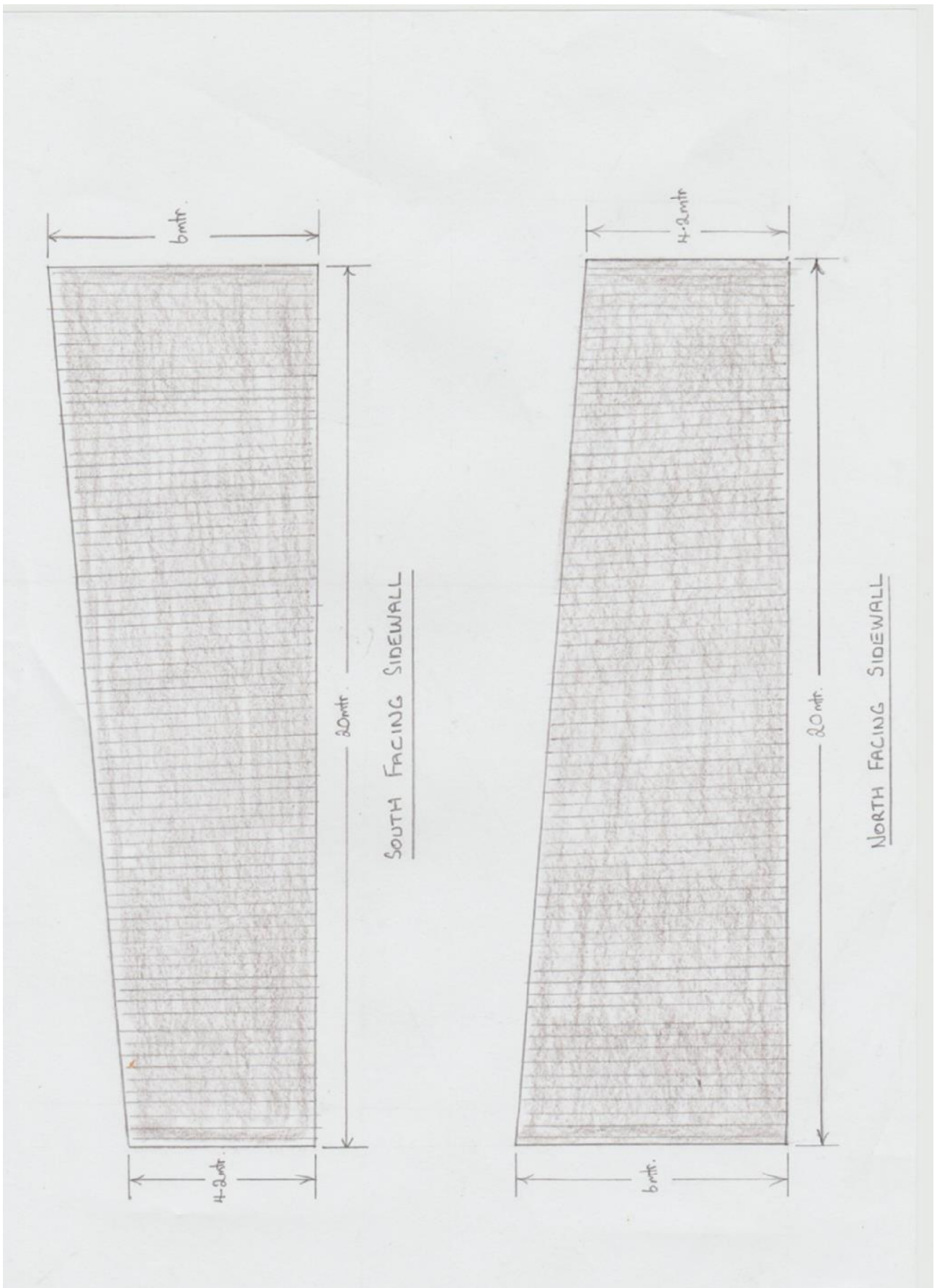
Comment

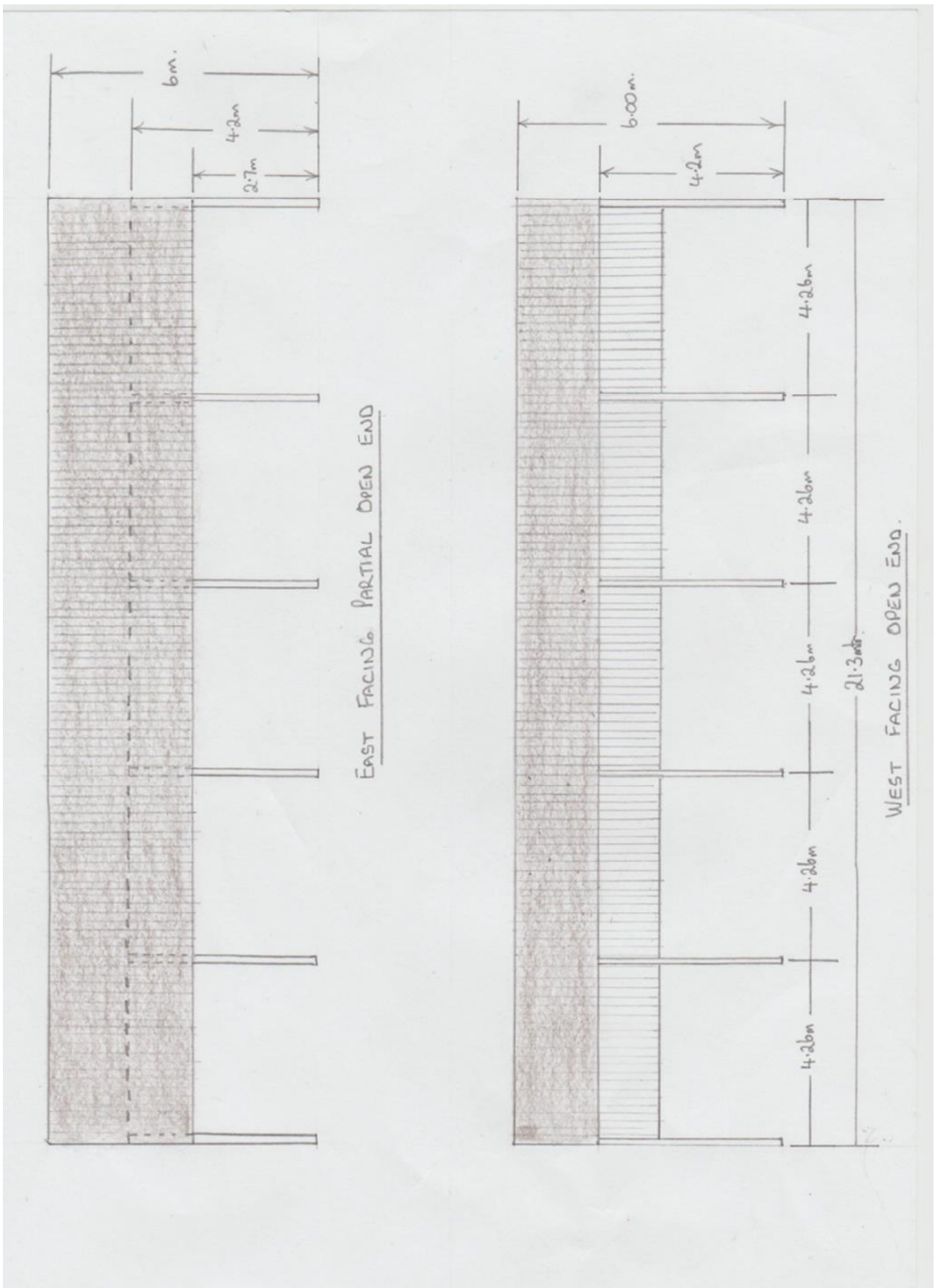
The proposal will provide a limited use over the site with bus operations restricted to school days and generally between the hours of 6.40am/7.15am to 9.00am in the mornings and 2.40pm to 4.30pm/4.50pm in the afternoons. It is not considered that the proposed use will have significant impact on the adjoining properties or those within Shaban Close.

The dwelling houses on adjoining properties are setback at least 25 metres from the boundary of the subject land and are further setback from the actual transport depot shed. The western adjoining property retains natural vegetation buffering and a new vegetation buffer will be established by the developer to provide visual screening in all directions.

It is considered that the proposed development will not have a significant effect on the amenity of the immediate area.







10 October 2018

MICHAEL & NARELLE BAKSAJ
PO BOX 1863
MAREEBA QLD 4880
MOB: 0447 737 554
HOME: 4092 4390

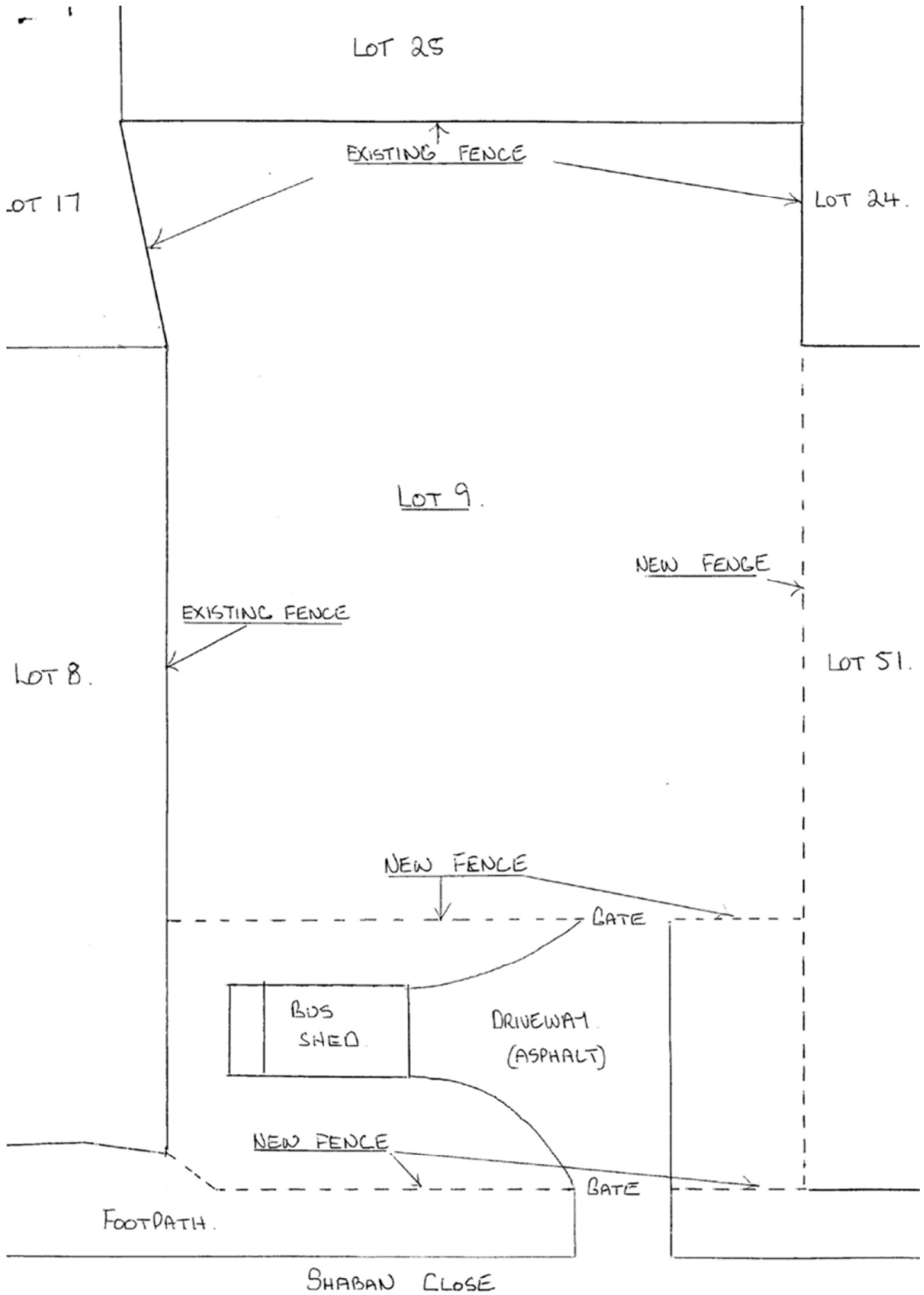
PROPOSED FENCING PLAN
LOT 9 SHABAN CLOSE MAREEBA

Along the Eastern and Southern boundaries existing fencing is already in place. The existing fences are a combination of chain mesh and hinge mesh fencing at 1200mm high.

Proposed new fencing on the Western boundary will be hinged mesh fencing with galvanised star pickets at 1200mm high.

Proposed fencing for the Northern boundary which is also the front boundary will be a feature fence of a rural/rustic appearance. Square timber posts and timber rails with rustic corrugated iron to make the fence solid in appearance, at a height of 1200mm.

Approximately 60 metres back from the front boundary will be a hinged mesh fence with gates, this will separate the proposed bus storage area from the proposed residential area to the rear of the block.





Mareeba Garden Centre

Anzac Avenue, Mareeba 4880

PH:0740922857 FAX 0740925148

Email: mareebagardencentre@bigpond.com

GARDEN DESIGN FOR MICHAEL BAKSAJ 2/10/18

SYZYGIUM AUSSIE SOUTHERN (*Syzygium australe*)

This is the tree of my choice for this property that will fill all requirements. It has a good rounded shape, glossy leaves and foliage that commences at the base of the tree. A three dimensional planting is not needed if all trees used are the same variety.

In my experience working with hundreds of these trees, they always keep their shape. They need plenty of water and a Native, preferable slow release fertiliser.

I would advocate planting without using any fertiliser at all. A light amount of fertiliser around mulch area a couple of weeks later is best.

When planting in the Tropics the roots will be looking for moisture so filling the holes with water before planting is the best bonus possible.

Syzygium Aussie Southern will provide a lovely healthy green buffer for both neighbours and the property owner which is very easy to maintain if the proper steps are taken before and after planting.

Rosemary Williams
Landscape Consultant
Mareeba Garden Centre

2 October 2018

Page 2 Design for Michael Baksaj

For full future blockout this design will require approx 200 plants of Syzygium Aussie Southern in 140mm pots.

Trees should be planted at intervals of 1.5m a distance of 1m from the fence.

Soil to be mounded above broken or hoed soil (existing).

Good watering on hoed soil will give roots of plants a better chance of moving around and growing into the under soil as well.

2-3m of additional soil brought in should be sufficient but allowing for the whole fence line will amount to a considerable amount of soil to be added.

Soil should be tested before planting as natives need a fairly acidic soil PH and definitely an acidic fertiliser. A basic soil test can be carried out at Mareeba Garden Centre.

MULCH

Tea tree mulch is very good as it has an acidic PH.

Some MSC tip mulch is okay but the PH needs to be checked.

ALTERNATIVE TREE

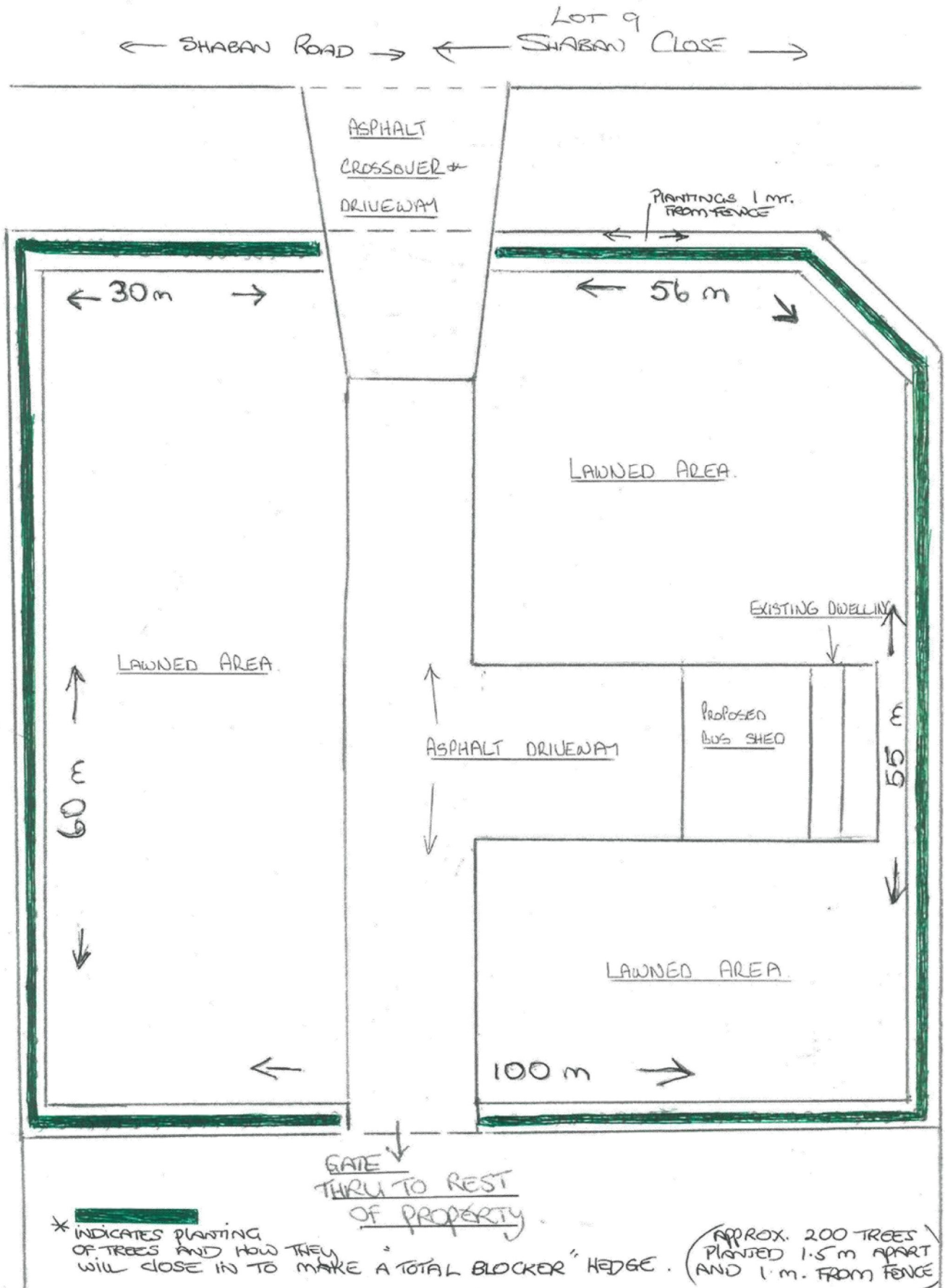
As there is a huge demand for hedging at present and should the recommended syzygium be low in supply a suitable substitute for Aussie Southern would be Syzygium australe Resilience.

Should you have any questions at all regarding this project please ring me "Rosie" on 0458 510529.

"

③ LANDSCAPE DESIGN FOR MICHAEL BAKSAJ

BY ROSEMARY WILLIAMS LANDSCAPE CONSULTANT 11/10/18.



Design for Michael Bakas.

By Kosemark Williams 1/10/18.

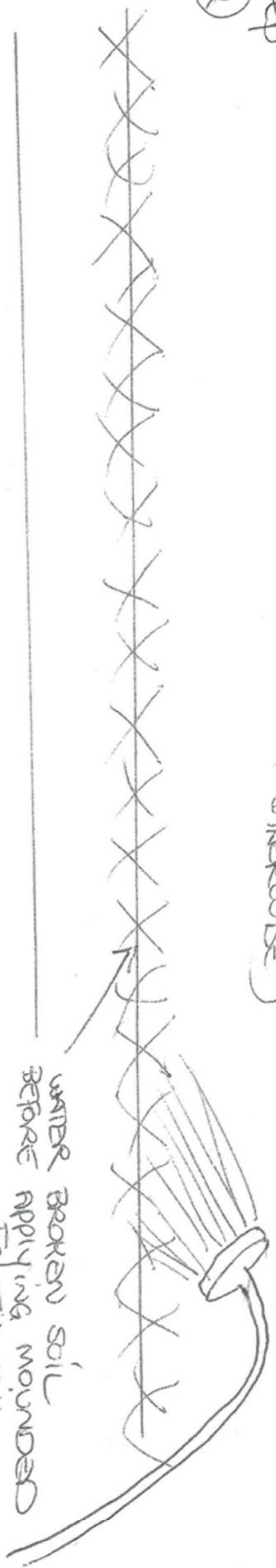
Step 1



"ripped" or broken soil

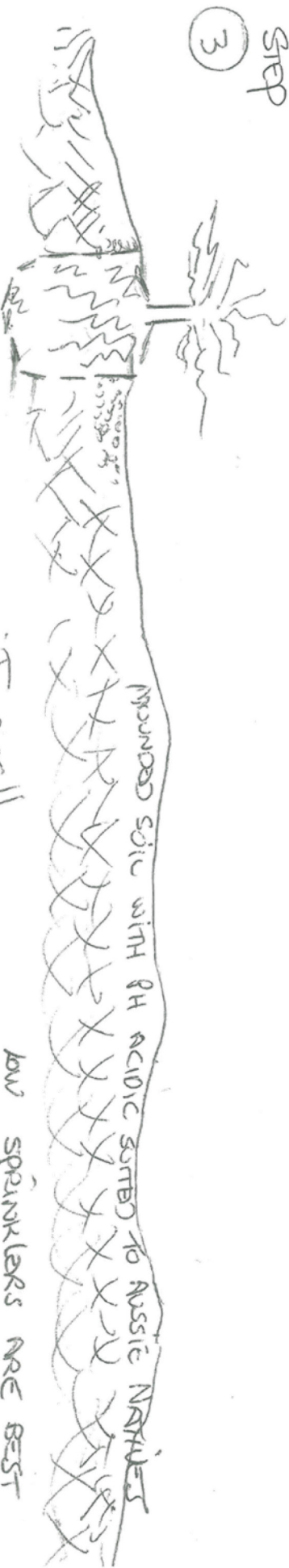
HARD SOIL IN HOT DRY CLIMATE REQUIRES THE SOIL TO BE RIPPED OR ROMNEY BED (IT WILL NEVER ACHIEVE THE BEST RESULTS OTHERWISE)

Step 2



WATER BROKEN SOIL BEFORE APPLYING MOUND SOIL.

Step 3



MOUND SOIL WITH PH ACIDIC SUBST TO ASSURE NUTRIENTS

NO FERTILIZER UNDER ROOTS IN TROPICS!!
FILL HOLES WITH WATER BEFORE PLANTING AND ALLOW TO DRAIN

(BOTTOM ROOTS WILL BENEFIT WITH LOTS OF WATER)

LOW SPINKLERS ARE BEST USED, AS DRIPPERS CONSTANTLY BLOCK IN LEG AREAS WHERE MAINTENANCE IS DIFFICULT.

7