

5 May 2021

To: The Independent Planning Commission

SSD 8544 - Glebe Island Aggregate Handling Facility and Concrete Batching Plant

This submission has been prepared by Ethos Urban on behalf of Hanson, in relation to the proposed Glebe Island Aggregate Handling Terminal and Concrete Batching Plant (SSD 8544) that is currently before the Independent Planning Commission for determination.

Hanson has been progressing with detailed design and construction tendering processes, and has been receiving advice from builders in relation to constructability of the proposal. As part of this there have been a number of minor design refinements suggested that are considered beneficial in relation to the constructability of the development, and which Hanson would like to pursue. As such, the purpose of this letter is to set out the proposed designed refinements, and seek the agreement of the Commission (as the consent authority), pursuant to clause 55 of the *Environmental Planning and Assessment Regulation 2000*, to amend the development application.

It is noted that similar refinements to the design have previously been accepted by the Department at the Response to Submissions stage of the assessment process – acknowledging the nature of the proposed development and the minimal or beneficial effect on environmental impacts that are likely to arise.

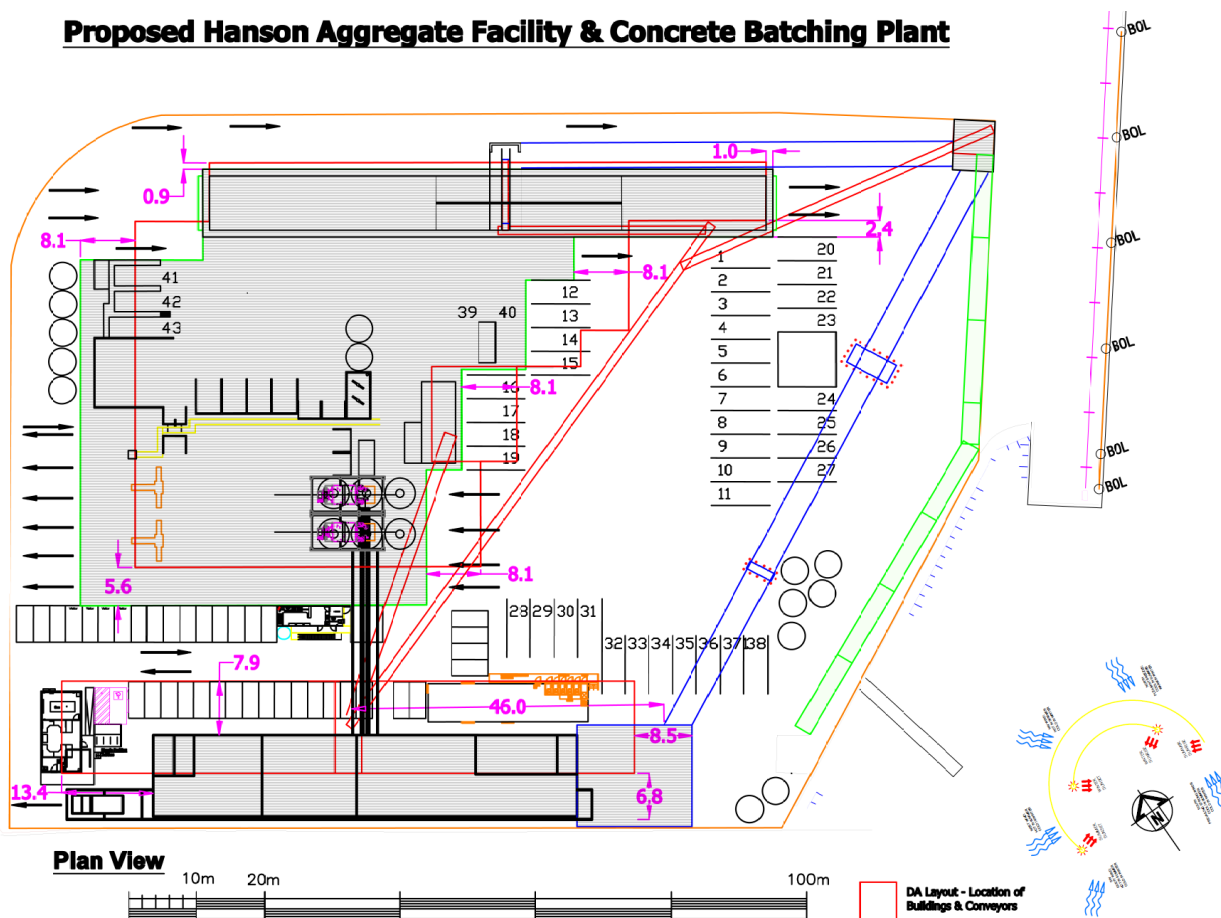
The Proposed Amendment

The proposed amendment to the development application would be limited to replacing the Site Plan Drawing (GAs – D1, Revision C, dated 30/10/2019) with the attached Site Plan. The figure below provides a comparative illustration of the design of the facility as it is proposed to be amended, with the red line boundary showing the location of the buildings and structures based on the current plan, for comparative purposes. The proposed amendments are described as follows:

- Shifting the concrete batching plant shed approximately 8m towards the west, away from the closest residential receptors in Pyrmont.
- Shifting the aggregate silos approximately 7m to the south, and a minor reduction in the overall footprint of the aggregate storage silos.
- Minor rearrangement of light vehicle car parking to accommodate the revised building footprint. No change in total number of light vehicle parking spaces.
- Minor rearrangement of truck parking spaces to accommodate the revised building footprint. Total number of truck parking spaces would reduce from 50 to 43.
- Minor relocation and reorientation of enclosed receival bin conveyor, to create a shorter overall length of the conveyor between the aggregate receival bin and the aggregate storage silo.
- Relocation of the site office and reception building to the western end of the aggregate storage silos, compared to the western end of the concrete batching plant shed.
- Relocation of the site water tanks to accommodate the revised building footprint.

No change is proposed in relation to the operational capacity or general arrangements for vehicle access.

Proposed Hanson Aggregate Facility & Concrete Batching Plant



Assessment of Revised Site Layout

Overall changes proposed to the arrangement and layout of the facility are minor, and are not of a scale or nature that can result in any new impacts or a significant increase in any previously assessed impacts. All potential impacts associated with the changes are considered further in **Table 1** below.

Table 1 Consideration of Impacts Associated with the Proposed Amendments

Changes	Consideration of Impacts
Shifting the concrete batching plant shed approximately 8m towards the west, away from the closest residential receptors in Pymont.	<p>No new impact and no increase in any previously assessed impacts.</p> <p>The amended design occupies a slightly reduced footprint relative to that originally proposed and assessed, but there is no overall change in the height, bulk and scale of the buildings and structures and from a visual perspective it is not expected that the amended building design would be noticeable.</p> <p>The change in footprint does not affect the type or intensity of activities proposed to be carried out at the site, and would not be expected to result in any noticeable change to assessed noise impacts. Being slightly further away from sensitive receptors would, if anything, likely result in a marginally lower level of noise at these receptors.</p>

Changes	Consideration of Impacts
<p>Shifting the aggregate silos approximately 7m to the south, and a minor reduction in the overall footprint of the aggregate storage silos.</p>	<p>No new impact and no increase in any previously assessed impacts.</p> <p>The amended design occupies a slightly reduced footprint relative to that originally proposed and assessed, but there is no overall change in the height, bulk and scale of the silos. Visually, it is not expected that the amended building design would be noticeable.</p>
<p>Minor rearrangement of light vehicle car parking to accommodate the revised building footprint. No change in total number of light vehicle parking spaces.</p>	<p>No noticeable change to visual or noise impacts. All parking will still be located behind the proposed container wall and for light vehicles is located in-between the aggregate silos and concrete batching building. The total number of light vehicle parking spaces will not change, so suitable parking will still be provided.</p>
<p>Minor rearrangement of truck parking spaces to accommodate the revised building footprint. Total number of truck parking spaces would reduce from 50 to 43.</p>	<p>No noticeable change to visual or noise impacts. All truck parking will still be located behind the proposed container wall, and will predominantly be located around the eastern end of the concrete batching building. The reduced number of truck parking spaces relates to overflow parking spaces that had previously been identified along the internal access road along the northern southern sides of the buildings – these spaces were in reality overflow parking spaces that were not needed and were not ever likely to be used. The 43 parking spaces for trucks is sufficient to allow parking on site for all trucks that will be based or will need to access the facility.</p> <p>It is highlighted that proposed Condition B17 provides for the submission of a Car Park and Service Vehicle Layout that requires the parking arrangements to be safe, secure, and functional, and to prevent queuing off-site. The inclusion of this condition indicates an acceptance from the Department that the car and truck parking arrangements may vary slightly from the approved plan, as is now proposed. Further, Condition E6 requires the preparation of an Operational Traffic Management Plan that includes a Heavy Vehicle Management Plan, and which also ensures no off-site queuing. With the application of these conditions it is considered that no off-site parking or traffic management issues will occur, and the site will need to be demonstrably suitable in terms of truck parking arrangements.</p>
<p>Minor relocation and reorientation of enclosed receival bin conveyor, to create a shorter overall length of the conveyor between the aggregate receival bin and the aggregate storage silo.</p>	<p>No significant change to visual or noise impacts.</p> <p>The location of the aggregate receival bin will remain the same, however the enclosed conveyor will make a more direct connection to the aggregate silos, resulting in an alignment slightly to the east of the current plan. Notwithstanding this the conveyor is shorter, and more direct, being a straight connection with no changes in direction (as there are in the current design). As such, it is considered that that the amended design will not result in visual and noise impacts that are noticeable compared to what has been assessed and recommended for approval by the Department. In particular in relation to noise, Hanson is confident that the design of the conveyor will be able to achieve or improve on the allowable noise emissions accepted by the Department.</p> <p>It is highlighted that proposed Condition B24 requires all mechanical plant to be demonstrably compliant with the Noise Policy for Industry, ensuring that noise emissions from the conveyor will continue to comply with the Policy irrespective of any minor variations in the location of mechanical plant. In addition to this, Condition E5 requires the preparation of an Operational Noise Management Plan, and Conditions F4-F17 require compliance with the specified noise levels at the closest residential receptors, and monitoring to be undertaken to verify compliance. With the application of these conditions it is considered that no off-site noise impacts will occur beyond what has been accounted for in the proposed development consent.</p>
<p>Relocation of the site office and reception building to the western end of the aggregate storage silos, compared to the western end of the concrete batching plant shed.</p>	<p>No new impact and no increase in any previously assessed impacts as design refinements are minor and will not be noticeable from off-site.</p>
<p>Relocation of the site water tanks to accommodate the revised building footprint.</p>	<p>No new impact and no increase in any previously assessed impacts as design refinements are minor and will not be noticeable from off-site.</p>

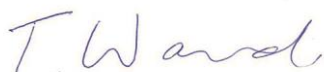
Conclusion

With consideration of the minor nature of the proposed design refinements, and the lack of any meaningful or noticeable impacts arising that could reasonably be considered to arise from the refinements, Hanson seeks the agreement of the Commission to amend SSD 8544 prior to its determination by the Commission.

We would be happy to further discuss these design refinements at the stakeholder briefing scheduled for Thursday 6 May, or to provide any additional information that the Commission considers necessary in order to justify or support the proposed design refinements and DA amendment.

Please do not hesitate to contact me on 0450 133 453 or at tward@ethosurban.com if you need anything further, otherwise we look forward to briefing the Commission on Thursday.

Yours sincerely,



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