



28 May 2021

Mr Stephen Barry
Planning Director
Independent Planning Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

by email: [REDACTED]

Dear Mr Barry

**Glebe Island Concrete Batching Plant and Aggregate Handling Facility (SSD 8544)
Questions on Notice**

I refer to your correspondence dated 7 May 2021 regarding the above application.

The Department has consulted with the Applicant and has provided a response to the Commission's questions about the proposal at **Attachment A**.

If you have any questions about this matter please contact Karl Fetterplace, Senior Planning Officer, on [REDACTED] or via email at [REDACTED].

Yours sincerely

A handwritten signature in black ink, appearing to read 'Anthony Witherdin'.

Anthony Witherdin
Director
Key Sites Assessments

ATTACHMENT A

1. Strategic Context

- a) *The Department's Assessment Report includes Figure 9 - 'Bays West Structure Plan 2040 and beyond' from the Draft Bays West Place Strategy (Strategy), which shows public access on the site with an elevated public domain. Please provide advice on the implications of SSD-8544 on the Bays West vision as outlined in Figure 9.*

The draft Place Strategy (the Strategy) seeks to improve foreshore connections throughout the precinct where possible. However, it also recognises that the working harbour and operational port would need to be accommodated. Where land use conflicts occur, the Strategy includes options for connections to run within the precinct instead of along the foreshore and consideration of innovative solutions (such as the provision of an elevated public domain area).

Given the site would be used for a ports and employment purpose and it would need to utilise heavy machinery and the adjoining port, the proposal does not include public domain areas or pedestrian access through the site. However, the Department considers the proposal would not preclude the provision of connections to run within the precinct or consideration of other innovative solutions to provide public domain areas.

The Department notes that an elevated public domain would be one potential way to provide open space where land use conflicts occur, however the strategy would not preclude the provision of public domain being provided by an alternate means. Further improvements to access to and around the site and the provision of public domain areas would be subject to further detailed planning including careful consideration of site constraints, land use conflicts and consultation with relevant stakeholders.

- b) *The Department's Assessment Report identifies the proposal "is consistent with the Draft Bays West Place Strategy's designation of the site as a concrete batching facility that would utilise the existing berths, whilst allowing for potential future uses to coexist within the precinct" (page V). Please provide some more detail regarding the coexistence of the proposal with potential future uses in the Precinct.*

The Department notes the site is located within the Glebe Island East sub-precinct, which would contain an integrated ports facility (including concrete batching and use of the existing berths). The Department is satisfied the proposal is consistent with the Strategy's designation for the site as a concrete batching facility that would utilise the existing berths.

The Strategy also seeks to allow other uses to co-exist within the precinct so it can evolve over time into a mixed-use precinct with integrated and enhanced port and working harbour activities. To ensure future uses can coexist, the Department recognises that further detailed planning of the sub precincts would need to take place to minimise any land use conflicts. Future master plans, rezonings, buffer zones, DCPs, development applications and new emerging technologies, will play an important role in managing potential land use conflicts at the site. The Port Authority of NSW would also work with stakeholders to consider how the future port and maritime functions can evolve and innovate to complement other future land uses within the Bays West area.

The Department has also sought to minimise the impacts associated with the proposal to the greatest extent possible and has included a range of conditions to ensure the potential impacts of the proposal are appropriately mitigated and managed. This includes applying strict noise criteria based on the best achievable noise levels for the proposal, sourcing a dedicated quieter vessel to supply raw material to the facility to ensure noise from ship berthing is minimised, and requiring management plans (to be prepared in consultation with Councils and government agencies) to address noise and air quality issues. This would also assist in allowing other uses to coexist on the site in line with the vision of the Strategy.

c) *What are the likely time frames in the Strategy for development of the Glebe Island East Sub Precinct?*

At present, the Department’s priority is to commence master planning and rezoning for the Bays Metro Station and White Bay Power Station. The timing of other precincts including the Glebe Island East Sub Precinct has not yet been confirmed. However, the Department notes the timing as indicated in the Bays West Structure Plan is 2040 and beyond.

2. Height details

a) *The RL height of the heritage silos (to top of concrete) and the Multi-User Facility surrounding the project site*

- The height of the heritage silos (to top of concrete) is RL 43.891 AHD
- The height of the signage structure affixed to the silos is RL 52.4 AHD
- The maximum height of the overall built form, which includes the silos is approximately RL 65 AHD
- The height of the Multi-User Facility is approximately RL 24.2 AHD

b) *The RL of the ANZAC Bridge deck at the pylon structure closest to the proposed development:*

The height of the ANZAC Bridge deck at the pylon structure closest to the proposed development is RL 30.63 AHD.

c) *The RL height of all proposed buildings at the Project Site:*

Building	Top of Building (RL, m)
Cement Silos	28.1
Concrete Batching Shed	11.4
Aggregate Storage Silos	37.6
Truck Unloading Tipper Bay	19.2
Aggregate Receival Bin	15.0
Shipping container wall	10.8

3. Landscaping

a) *The Applicant and NSW Port Authority have commented that it is impractical to provide landscaping on the Site other than the green wall attached to the containers and small plants. The Department’s Assessment Report states that “...the Applicant proposed a Landscape Plan to mitigate visual impacts. The Department supports the provision of landscaping on the site to help soften and screen the development where practical to do so and recommends a condition...” (paragraph 6.3.18). The Commission seeks further assessment of visual impacts, on the basis that the applicant has stated that it is not practical to provide landscaping of sufficient size/quantity to “screen” and “soften” the proposal, particularly the silos.*

The Department accepts that landscaping would not screen the proposed taller structures, and there are currently no deep soil zones on the site that would allow large trees to be planted. The Department also accepts that the site is bounded to the north by the Multi-user facility and the south by the existing Glebe Island Bridge abutments.

However, despite these constraints, the Department does not agree that it is impractical to provide some landscaping on the site, and that, in conjunction with public art, would help mitigate and soften the visual impacts of the proposal. The Department also notes that the provision of a Landscape Plan was a key mitigation strategy outlined in the Applicant’s Visual Impact Assessment. The Department therefore recommended Conditions B26 (Public Art Strategy) and C40 (Landscape Plan) to require the Applicant to submit further details of measures to soften the visual impact of the

proposal, including the silos and proposed green wall (including details of planting and maintenance). The condition also requires the Applicant to prepare the Public Art Strategy and Landscape Plan in consultation with the Port Authority, local residents and resident groups, and the Inner West and City of Sydney Councils. This would help address the visual impacts of the proposal and provide some visual interest.

b) *Please provide further details regarding the practicality of providing a green wall attached to the shipping container wall, ongoing maintenance challenges and its effectiveness in mitigating visual impacts.*

The Applicant states that a green wall can be attached to shipping containers in the same way that it could be attached to any other structure or building which typically supports green walls.

The Department's recommended condition would require details of the green wall to be submitted to and approved by the Department prior to the issue of the relevant Construction Certificate. The Department would need to consider matters such as maintenance requirements and appropriate plant species for the local climate, at that time. However, the Department considers the recommended Conditions B26 and C40 could be strengthened to include a specific requirement for a maintenance plan to be prepared and implemented for the proposed green wall, should the IPC wish.

Regarding its effectiveness in mitigating visual impacts, the Department considers the proposed green wall would help screen views to the east of the truck parking and movement areas, and other ground level activities at the site, as well as the lower portions of the silos and concrete batching building.

4. Noise / Enclosure of Structures

a) *At paragraph 6.4.4, the Assessment Report describes how concrete batching will be undertaken in a partially enclosed building. Can the Department please confirm the extent of enclosure of all structures proposed.*

The Applicant has committed to carrying out all concrete batching and truck unloading activities within fully enclosed buildings. The only proposed openings relate to the time-limited opening of roller doors for loading and unloading. Additionally, the entire conveyor system would be fully enclosed. The Applicant also advised that aggregate trucks would be loaded on weighbridges directly underneath the silos in a partially enclosed space, filled from a chute from inside the silos structure (as opposed to originally being proposed on the outside of the silos). The Department understands the Applicant has provided the Commission with amended plans to clarify this.

b) *The Applicant has indicated that the silos may be concrete or other material, such as metal cladding. Please confirm whether the Noise Assessment for the project specified whether the buildings need to be a specific material or acoustically treated to meet noise criteria.*

The Applicant's EIS states that the silos would be constructed out of concrete and the Department has assessed the proposal on this basis. The Noise Assessment does not specify that the buildings (including the silos) need to be a specific material or acoustically treated to meet the relevant noise criteria.

5. Traffic

a) *The intersection delays that have been identified at The Crescent/City West Link Road intersection are expected to result in a reduced Level of service (LoS) and resultant queuing impacts, with or without the proposal. The Commission seeks information to understand the developments that are included in this assessment of the cumulative impact and the length and location of queuing, particularly during the AM and operational peak periods.*

The TIA assessed the cumulative traffic impacts associated from existing development and with several construction support sites that are either in place or planned for the area to facilitate the construction of major transport projects including:

- WestConnex M4-M5 Link and Rozelle Interchange projects
- Western Harbour Tunnel and Warringah Freeway upgrade
- Sydney Metro City & Southwest project

The TIA also considered the impacts associated with the Port Authority's Multi-User Facility.

The traffic modelling (based on a worst-case scenario considering cumulative impacts) indicates the southern leg of The Crescent experiences significant delays (under current and future operating conditions). Queuing on the southern leg of the intersection (i.e. the northbound traffic on The Crescent approaching the intersection) is modelled to extend up to approximately 840 m.

The Department notes the Applicant's TIA assessed impacts prior to the opening of the Rozelle Interchange. If the proposal is not operational until 2024 (as now advised by the Applicant), the Rozelle Interchange is planned to be open by this time, providing relief to the road network.

b) The truck route for the development includes The Crescent, which passes through residential areas. Further information is sought on the proposed truck routes and potential impacts.

The Traffic Impact Assessment (TIA) does not nominate The Crescent as a specified truck route. Aggregate haulage trucks will almost exclusively use the existing arterial road network and the WestConnex (including the Rozelle Interchange) once it is operational. Concrete agitator trucks would only travel along The Crescent if they are accessing worksites located along The Crescent or surrounding areas.

The Department also recommended Condition A5 (Limits on Consent) to prevent access to and from the site through residential areas.

c) Information relating to the volume and frequency of sand deliveries by truck.

The Applicant has confirmed that trucks would be used to deliver and dispatch sand and aggregate to and from the site and these movements were included in the total truck movements assessed in the TIA. The Applicant estimates total sand deliveries would be 75 per day for an average production day and up to 241 trucks per day for a peak production day. These trucks would be predominantly spread across the 12-hour workday (7am-7pm), although they could arrive during the night-time period. Arrival times are dependent on a number of factors, including the quarry they are sourced from, its operational or approval constraints, and traffic conditions. The Applicant therefore states it cannot specify an hour-by-hour breakdown of the frequency, however up to approximately 20 trucks per hour are expected during peak operational periods.

6. Construction period

a) The Applicant has indicated that the construction period would be 18-24 months with completion around 2024. Please confirm this is the period that the Department based its assessment on and provide any further comments, if necessary.

The Department based its assessment on the construction timeframe specified in the Applicant's EIS which states that construction would be undertaken over a six to nine-month period, with operations commencing in mid-2022.