

From: [Cameron Sargent](#)
To: [Casey Joshua](#)
Cc: [Anthony Witherdin](#); [Karl Fetterplace](#)
Subject: Response - IPC draft conditions - Glebe Island Silos -SSD 8544
Date: Monday, 19 July 2021 4:49:33 PM
Attachments: [RFI Response re Draft Conditions 20210715 FINAL.pdf](#)

Dear Casey

Please find attached Hanson's response to the Independent Planning Commission's draft development consent. There are five main conditions that Hanson has made specific comments on.

The Department has reviewed the response and makes the following comments.

Condition B26(a) (i) – The Department agrees that referring to the 'average height of the Anzac Bridge deck' is unclear. However, the removal of the RL 30.36 reference would create greater uncertainty. To remove this uncertainty, it is recommended that Condition B26(a)(i) be worded "The maximum height of the silos (including roof) must not exceed RL 30.36 AHD (being the RL of the deck at the pylon closest to the aggregate silos)".

Condition D4 – This is not supported. Reference to the words "unless otherwise permitted by the Planning Secretary" should be removed as this is not a standard condition of consent. If the Applicant wishes to extend the hours of construction during the works, they should lodge a modification application with the Department that can be assessed on its merits.

Condition F3(e) – This is not supported. The Department's assessment (and Applicant's proposal) only considered the delivery of 1,000,000 tonnes of aggregate per year (whether by ship or truck). The Applicant's proposal for an additional 500,000 tonnes of aggregate per year delivered by truck and its associated potential environmental impacts never formed part of the application and is outside of the scope of the Department's merit assessment.

Condition F4 – Noted. The Commission could seek clarity from the Applicant on how much of the 1,000,000 tonnes per annum of aggregate will be delivered by ship and road.

Condition F6 – The Department notes the Applicant would accept the Commission's recommended shipping curfew on the basis that vessel deliveries be increased from 3 per week/max 10 per month to 18 per month/216 per year. The Department advises, that while the Commission may decide to consider this request, it is outside of the scope of the Department's merit assessment.

If the Commission would like to discuss anything further on the above matters, please contact me on the number below or email me on [REDACTED]

Kind regards

Cameron Sargent
Team Leader, Key Sites Assessments

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Planning,
Industry &
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The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

15 July 2021

Anthony Witherdin
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Dear Mr Witherdin,

**RE: Glebe Island Concrete Batching Plant and Aggregate Handling Facility (SSD-8544)
Request for Comment on Conditions (Draft V03 IPC additions)**

Hanson Construction Materials Pty Ltd (Hanson) is writing in response to a request for comment on conditions received from the Department of Planning, Industry & Environment (DPIE) on 9 July 2021. Hanson's comments are provided below.

Condition B26(a)(i) – Maximum Height of Silos

The IPC have proposed for the aggregate storage silos not to exceed the average height of the ANZAC Bridge deck or RL 30.36 AHD. Since the average height of the ANZAC Bridge deck is likely to be a different height than RL 30.36 AHD, Hanson proposes that Condition B26(a)(i) removes any reference to the RL 30.36 AHD as this creates confusion given the slope of the deck. The suggested wording for this condition is:

- (i) *Reduce the height of the aggregate silos to the extent that the maximum height of the silos (including roof) does not exceed the average height of the ANZAC Bridge deck (opposite and for the length of the silos).*

Due to the uncertainty of the accuracy of the RL specified, the suggested wording will allow for a more refined and detailed survey to be completed during the final design phase of the project whilst ensuring that the intent of the condition remains as originally proposed.

Condition D4 – Construction Works Outside Standard Construction Hours

The IPC have proposed that construction works can only occur outside of the standard construction hours if required by the Police or public authority, or in an emergency.

Hanson proposes that the text *'unless otherwise permitted by the Planning Secretary'* is added to this condition as a means of providing a pathway for approval in the exceptional circumstance that construction works outside standard construction hours is required, noting that such a provision:

- Is a standard inclusion in State Significant Development consents.
- Retains the clear intention for construction works to be organised to occur during standard construction hours to the extent reasonably practicable.
- Retains the desired environmental objective of minimising noise impacts outside of standard construction hours.

Condition F3(a) – 1 million tonnes of concrete aggregates delivered to site per annum

The IPC have proposed that the concrete aggregates delivered to site must not exceed 1 million tonnes per annum. Hanson is seeking clarification if this condition should actually state: *'1,000,000 tonnes of concrete aggregate delivered **by ship** per annum'*, as this is what is stated on Page 1 of the Draft Conditions of Consent. We also note that this is consistent with our letter of 19 May 2021 which confirmed that Hanson intends to deliver 1 million tonnes of aggregates by ship as well as up to 0.5 million tonnes by road, given that not all aggregates used at the facility can be sourced from quarries with sea access.

Condition F4 – 80% of Concrete Aggregates Delivered by Ship Per Annum

The IPC have proposed that 80% of the concrete aggregate delivered to the site per annum must be delivered by ship.

Hanson has undertaken operational modelling and has identified that if the silo storage capacity and the shipping frequency is limited as is currently proposed (by conditions B26 and F6 respectively), there will be an increased risk of the facility regularly running out of aggregates. This would severely impact the operational efficiency of the facility and undermine the environmental and economic benefits predicted to be achieved through the operation of the facility. The proposed limitation in Condition F4 will therefore exacerbate the operational efficiency impacts arising from silo storage and shipping capacity restrictions, as it would create an added restriction in delivering aggregates to the site, potentially preventing aggregate delivery by road, at the same time as aggregates are restricted from being delivered by ship under condition F6.

Condition F6 –Aggregate Ship Deliveries

The IPC have proposed for Hanson to receive a maximum of 10 aggregate ship deliveries per month. We believe this figure has been extracted from page 31 of the Environmental Impact Assessment (EIS), *'Ship deliveries are anticipated three times per week and each delivery will last approximately 12 hours. Approximately 10 ships are anticipated each month.'*

The above statement was an average estimate based on the proposed annual shipping volume of 1 million tonnes of aggregates with a ship capacity of approximately 8,000 tonnes. At the time, the proposed onsite aggregate storage capacity was 26,000 tonnes which therefore allowed for a lower shipping frequency and a larger shipping capacity.

Due to the proposed restrictions in Condition B26(a)(i) to limit the height of the aggregate storage silos and Condition F6 to enforce a curfew on ship berthing and unloading activities, the latest production profile to meet a demand of 1 million tonnes requires aggregate deliveries by ship approximately 18 times per month or 216 times per year. Although, Hanson would prefer for the shipping limits to be on a yearly basis rather than a monthly basis to allow for increased shipments during peak operational periods throughout the year.

It is also highlighted that limitations on total or average ship movements would undermine the economic and environmental benefits associated with the facility, and are contradictory to the intent of Condition F4, which is to maximise the amount of the facility's aggregates to be delivered via ship.

Noting the existing unrestricted shipping arrangements at Glebe Island Berth 1, Hanson is willing to accept the ship berthing and unloading curfew hours specified in Condition F6 – which would impose a new restriction on shipping activities that is not currently and has not historically been applied at the port. This limit can be accepted, on the basis that the yearly maximum aggregate shipping deliveries is increased to 216 times per year. The decreased aggregate storage on site will allow for Hanson to ensure the dedicated ship is a more manoeuvrable, smaller, and quieter vessel. The smaller vessel removes the need for tugs which therefore also reduces the acoustics associated with tug activities. In addition, Hanson would also commit to not undertaking any berthing and unloading activities on public holidays.

Thank you for providing Hanson the opportunity to review the Draft Conditions of Consent. If you have any questions, please don't hesitate to contact Ashleigh Zarlenga via email

████████████████████ or phone ████████████████████.

Yours sincerely,

HANSON CONSTRUCTION MATERIALS PTY LTD



ANDREW DRIVER
Development Manager
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