JM/HQ/TW
17142
8 June 2017

Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39,
SYDNEY NSW 2001

Dear Ms McNally

CONCRETE BATCHING PLANT, GLEBE ISLAND
REQUEST FOR THE SECRETORY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

We are writing on behalf of Hanson Construction Materials Pty Ltd (Hanson), the proponent for the proposed concrete batching plant at Glebe Island.

Development with a Capital Investment Value (CIV) in excess of $10 million on land identified under Schedule 2 as 'Bays Precinct Site' is State Significant Development (SSD) for the purposes of the *Environmental Planning and Assessment Act 1979* (the Act) by way clause (8) of the *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD).

Hanson intend to seek development consent for a new concrete batching plant to be located at Glebe Island, within the Bays Precinct. The CIV of the envisaged development will be in excess of $10 million, and as such it will constitute SSD and an Environmental Impact Statement (EIS) will be required to accompany the development application. Accordingly, the purpose of this letter is to request the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of the EIS for the proposed development, pursuant to Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*.

The request for the SEARs below provides details regarding the site location, an outline of the project, and a preliminary consideration of the likely environmental and planning issues. We trust that the information provided below is sufficient to enable the Secretary to issue requirements for the preparation of the EIS.

1.0 BACKGROUND

Hanson currently operates a concrete batching facility at Blackwattle Bay, which is located on Bridge Road (Refer to **Figure 1**). The Blackwattle Bay facility also includes an aggregate shipping terminal, so it can take delivery of aggregates shipped from Hanson's Bass Point Quarry at Shellharbour.

Hymix, a subsidiary of Hanson, operates a concrete batching plant that is located north of the Sydney Fish Market at Bank Street, Pyrmont. The Hymix facility does not have shipping capability, so aggregates are delivered via road.

Figure 1 – Existing and proposed location the Hanson concrete batching plant

These sites have a combined capacity of up to 1,000,000m^3 per annum and together supply approximately 35% of Sydney City's concrete requirements. They collectively employ approximately 75 full time equivalent employees.

Both of these existing concrete batching plants are located within the Bays Market District area of the Bays Precinct, which includes the Sydney Fish Market. This Bays Market District Area is nominated as the first stage of the Bays Precinct Transformation Program and is identified as an 'immediate priority' for redevelopment. The anticipated project timeline for stage one is 'now-2019'.

With consideration of the likely redevelopment of the Bays Market District in the immediate future as part of the Bays Precinct Transformation Program, Hanson is planning for the closure of the existing Blackwattle Bay concrete batching plant. In addition to the general concrete supply impacts arising from the closure of the Blackwattle Bay facility, it will also result in the loss of aggregate shipping capacity in Central Sydney.

At the same time Sydney, and in particular the areas around and within the Central Business District (CBD), is also currently experiencing very high levels of construction and building activity, with multiple infrastructure projects and a large number significant developments underway. This is setting an unprecedented demand on concrete production capacities within inner Sydney. These high levels of construction activity are expected to continue in the medium term, in part due to the ongoing delivery of major infrastructure projects by the NSW Government.

Hanson is therefore seeking to develop a new concrete batching plant at Glebe Island, where it can be collocated with aggregate shipping facilities. Co-location of a concrete batching plant within the operational port facility, in proximity to Sydney CBD and the Bays Precinct itself, is of strategic merit, and offers several logistical benefits. The proposed facility at Glebe Island will allow Hanson to continue its supply of concrete to a range of concrete intensive projects around Central Sydney in a way that is efficient and effective, and minimises regional road traffic impacts by securing ongoing aggregate shipping terminal capability.

2.0 THE SITE

Located at Rozelle, Glebe Island is surrounded by White Bay (north), Johnston Bay (east) and Rozelle Bay (south). Glebe Island connects to mainland areas of Rozelle to its west.

Glebe Island is one of the last remaining industrial port facilities within 2km of Sydney City. The port has historically been used in the transportation of bulk construction materials such as cement, gypsum and sand and currently functions as a deep water port for common user berths, dry bulk imports and cruise ships. Glebe Island and White Bay are seen to be the only deep water wharves west of Sydney Harbour Bridge.

The port facility currently falls under the jurisdiction and management of Port Authority of NSW. The site is legally described as Lot 10 under Deposited Plan 1170710.

In addition to the port related uses, Glebe Island accommodates warehouses, manufacturing plants, and low to mid-rise commercial office buildings. The port's two eastern berths (Berth 1 and Berth 2) are located along the length of the Island's south-eastern edge. Much of the Glebe Island's remaining eastern part is undeveloped and currently incorporates at-grade parking.

The Island also contains several heritage listed items of local and state heritage significance. Of particular relevance to the area is the heritage listed Glebe Island Silos, which are located along Sommerville Road. The silos are understood to be used in association with Cement Australia's cement distribution facility.

Road access to Glebe Island is provided via the City West Link and James Craig Road.

3.0 DESCRIPTION OF PROPOSED DEVELOPMENT

Hanson propose to develop a new intermodal concrete plant to be located adjacent to Glebe Island Berth one (GLB1), as shown in **Figure 2**. The plant will be designed with a capacity to produce up to 1 million tonnes of concrete per annum. Concrete from the batching plant will be dispatched to the respective construction projects via agitator trucks.

The concrete batching plant will be supported by new aggregate shipping terminal facilities at GLB1 with the capacity to manage up to 1 million tonnes of concrete aggregates per annum delivered by ship from the Hanson Bass Point Quarry. In addition to being used directly within the new Glebe Island concrete batching plant, the shipping terminal facility will also support the existing Hymix concrete batching plant at Pyrmont. Aggregates unloaded at GLB1 will also be destined for nearby concrete plants such as Hymix Pyrmont across the Anzac Bridge. By facilitating delivery by ship, the proposed development will reduce the number of trucks required to haul aggregates into Sydney on the regional road network by up to 65,000 per annum.

The proposed hours for shipping activities and for the operation of the concrete batching plant are 24 hours a day, seven days a week. The proposed facility will employ approximately 100 full time equivalent employees.

The facility is proposed to adopt a low profile design sympathetic to its surrounding environs. The highest structures will be the cement silos which will be half the height of the adjoining heritage listed Glebe Island Silos. The plant will be managed and controlled in a similar manner to the Blackwattle Bay wharf and Bridge Street plants.

The proposed development will comprise of the following main components, with a general layout as shown indicatively in **Figure 2**:

- Purpose built aggregate storage bins;
- A raw material storage area;
- Waste management area;
- A car and truck parking facility;
- Loading and slumps stands; and
- Ancillary Site office and staff amenities.

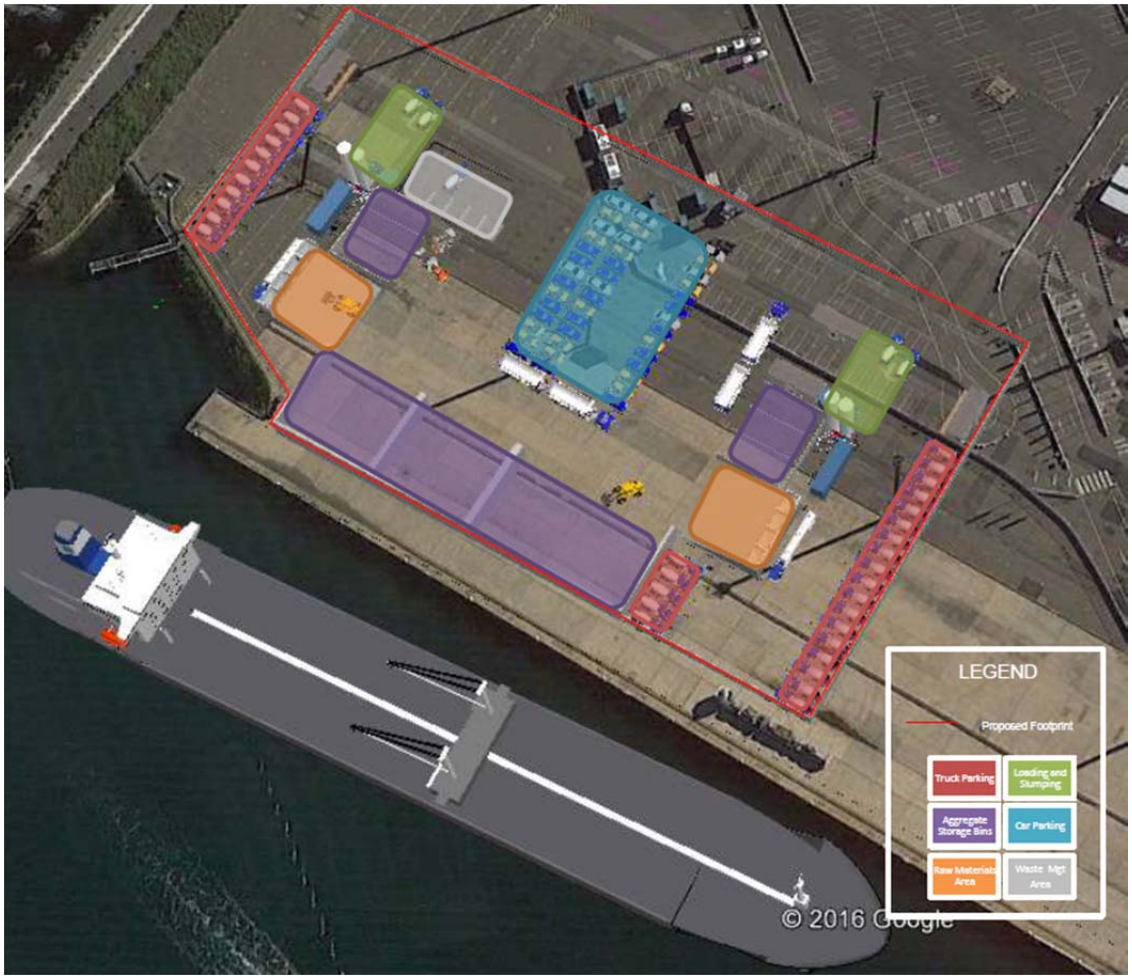

Figure 2 – Indicative features and components of proposed concrete batching plant
Source: Hanson

4.0 STRATEGIC CONTEXT

Glebe Island forms a part of the wider Bays Precinct area which is earmarked for staged urban renewal. Within the Bays Precinct, Glebe Island is situated within the 'longer- term priority destinations', which also include Rozelle Rail Yards and White Bay. Work in relation to these destinations is anticipated to start after 2022.

The strategic plan for the Bays is set out under the document titled '*The Transformation Plan: The Bays Precinct, Sydney.* The plan identifies a key feature for Glebe Island '*as a potential temporary construction logistics site for major infrastructure projects'*. This proposal for a concrete batching plant is consistent with the short to mid-term strategic goals for Glebe Island.

We note that the location of a concrete batching plant at Glebe Island is of short to mid-term strategic importance to the dynamics of the rapidly evolving Sydney City. The relocation of the existing batching plant capacity from Blackwattle Bay will ensure that the current and near future demand for concrete in and around Sydney CBD is still being met. With several critical infrastructure projects, such as Sydney Metro and Westconnex, underway and other renewal and infill projects ongoing within Sydney City, it is vital that support industries such as concrete batching plants are co-located in close proximity to actual demand. Given the time-sensitive nature of concrete, it is particularly important that mixed concrete is delivered to a construction site in a relatively short time span after it is batched, otherwise it will not meet technical specifications, and can even solidify in the agitator truck. Construction sites greatly benefit from having close access to these facilities.

The proposal is also in line with the Port Authority of NSW vision and strategic direction for Glebe Island as documented under the *NSW Freight and Ports Strategy, 2013*. The strategy specifically identifies the potential benefits of relocating the Hanson aggregates import facility at Blackwattle Bay to Glebe Island, and co-locating it with a new concrete batching plant at Glebe Island. The strategy also recognises the wider market and economic benefits that the new Glebe Island facility offers in reducing transport costs and improving supply chain efficiencies.

5.0 STATUTORY CONTEXT

5.1 State Environmental Planning Policy (State and Regional Development) 2011

The *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD) under clause 8 identifies that specific development types detailed under Schedule 1, or specific sites listed under Schedule 2 of this policy as State Significant Development (SSD).

Schedule 2 of this policy identifies development located on land identified as 'Bays Precinct Site' with a CIV of more than $10 million as SSD. The proposed development is located within the Bays precinct at Glebe Island. Given that the CIV is over the $10 million threshold, the proposed development will be identified as SSD.

5.2 Sydney Regional Environmental Plan No. 26 – City West (City West Plan)

City West Plan is the statutory planning instrument that governs development of the site. On 1July, 2009 the regional environmental plan was considered to be taken as a State Environmental Planning Policy.

Under the City West Plan, Glebe Island is zoned 'Port and Employment'. This proposal for the purposes of a concrete batching plant is consistent with the following aims and objectives of the zone:

- *to facilitate the continuation of commercial port uses, and*
- *to allow a range of commercial port facilities (such as buildings, structures, activities or operations and uses ancillary to these, associated with carrying goods from one port to another and associated with storage and handling and access to the port), and*
- *to encourage development on Glebe Island and land adjoining White Bay which requires close proximity to the port, and*
- *to encourage a mix of land uses which generate employment opportunities, particularly in relation to port and maritime uses, and*

The proposal will introduce additional manufacturing/industrial uses at Glebe Island, which will greatly benefit by being located within an operational port facility less than 2 km from Sydney City. The proposed use will also underpin the ongoing commercial port related uses of Glebe Island.

The proposal will also support the Island's zoning objective to increase a mix of employment generating uses.

The proposal is also largely consistent with the Glebe Island and White Bay Master Plan document dated November 2000. The Master Plan, a requirement of SREP 26, was prepared to guide future development at Glebe Island and White Bay. The Master Plan provides for the continued use of Glebe

Island and White Bay as a significant commercial port facility in Sydney Harbour and sets out the vision for the future development of Glebe Island and White Bay.

5.3 Other Legislation and Approvals

The owner of Glebe Island is the Port Authority of NSW, a State Owned Corporation responsible for managing navigation, security and operational safety needs of commercial shipping in Sydney Harbour. Hanson will require a Lease from the Port Authority in order to use the land for the concrete batching plant, as well as for aggregate shipping and unloading activities at Glebe Island Berth No. 1. Lease negotiations have already commenced and it is expected that a Lease in the order of 20-30 years will be appropriate, given the long term strategic direction currently established for Glebe Island.

Roads and Maritime Services (RMS) are responsible for managing navigation and safety on NSW waterways, including Sydney Harbour. Whilst ships using Sydney Harbour will need to be registered and ship captains licenced, no approvals are required for ship passage through Sydney Harbour that complies with navigational safety rules.

The proposed new aggregate shipping terminal facilities will exceed the 'shipping in bulk thresholds set out in clause 37 of Schedule 1 of the *Protection of the Environment Operations Act 1997*. As such, the activity will require an Environment Protection Licence from the Environment Protection Authority (EPA).

No other approvals from NSW Government agencies are expected to be required in relation to the proposed intermodal concrete batching plant.

The shipped aggregates will be delivered from Hanson's Bass Point Quarry at Shellharbour, in NSW. As such, no Commonwealth quarantine or customs issues are expected to arise.

6.0 OVERVIEW OF LIKELY ENVIRONMENTAL AND PLANNING ISSUES

Based on our preliminary environmental assessment, the following are the key environmental assessment issues that will need to be considered as part of the future EIS:

- Noise and Vibration
- Air Quality
- Traffic and Transport
- Water Management
- Social and Economic
- View Impacts
- Waste Management
- Heritage

These issues are briefly examined below. The EIS will focus on the assessment of environmental impacts against the environmental standards of relevant plans and policies, and in the context of the new site.

6.1 Noise and Vibration

Given the complementary nature of the proposed industrial use at Glebe Island port, an operational industrial port, potential noise and vibration impacts on immediately surrounding uses are considered to be low.

The isolated nature of the Island, surrounded by water, further mitigates potential noise and vibration impacts to nearby sensitive receivers. The nearest residential developments from Glebe Island is located at Pyrmont. These residential buildings are understood to have been subjected to higher acoustic attenuation standards at their DA stage in light of their proximity to a 24 hours operational port facility. Notwithstanding, a detailed noise assessment will be carried out for the concrete batching plant noise in accordance with the EPA's Industrial Noise Policy, the NSW Road Noise Policy, and the Interim Construction Noise Guideline.

The potential noise impacts generated by the passage of ships delivering aggregates to the Glebe Island port facility will also need to be assessed in EIS, however it is highlighted that the EPA's Industrial Noise Policy is not considered to be an appropriate framework for this kind of noise source. Hanson will liaise with the Port Authority of NSW and the EPA in order to agree a more suitable assessment methodology in relation to ship noise.

The proposal will also contribute to reduced noise associated with travel of heavy vehicle trucks delivering aggregates on the regional road network.

6.2 Air Quality

Potential air pollution associated with a concrete batching plant is largely limited to dust emissions generated during transfer stages of aggregates from the delivery vessel to the storage bin, and then to the concrete mixer. All storage bins and conveyors on site will be designed in accordance with the EPA air quality standards and will be designed to minimise the effect of wind on loose dry bulk aggregates.

Cement handling and transfer will be undertaken under negative pressure pneumatic conditions, significantly limiting the possible generation of cement dust beyond the site. These handling and transfer practices are standard for modern concrete batching plants and will be utilised at the new Glebe Island plant. These practices are also utilised at the existing Cement Australia cement silos located at Glebe Island, and associated cement shipping terminal activities.

The EIS will undertake a detailed air quality impact assessment in accordance with the EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, focussing on dust emissions from the concrete batching plant as well as emissions from aggregate delivery ships whilst docked at Glebe Island. Appropriate air quality control measures will be put in place at the plant, and the assessment will demonstrate that no adverse air quality impacts would arise from the operation of the concrete batching plant or the associated aggregate shipping activities.

6.3 Water Management

Water management is considered necessary for this proposal given its proximity to the water bodies and the alkaline nature of cement.

A suitable stormwater management system will need to be designed to capture potential stormwater run-off. This will need to be treated prior to discharge. Wash-down water and other water collected inside the facility will be collected and treated in the batching process.

Details of water quality management measures will be described in the EIS. An assessment of water quality will also be carried out to demonstrate that discharges to the local stormwater management system will comply with contemporaneous standards in relation to quantity of discharges and pollutant load reduction targets for discharges.

6.4 Traffic and Transport

Co-location of a new concrete batching plant with the aggregate shipping terminal port facilities will facilitate significant opportunities to remove heavy vehicles from local and regional roads. It is proposed that the aggregates for the new concrete plant will be sourced by ship from Hanson's Bass Point Quarry, Shellharbour and the cement from Cement Australia's facility which is already located and functioning on Glebe Island.

Given that aggregates are currently delivered via road to the Hanson Blackwattle Bay and Hymix concrete batching plant in Pyrmont, this proposal will have a positive traffic impact on regional roads. In particular, the ship delivery of aggregates is estimated to reduce the number of trucks on the regional road network by up to 65,000 per annum. Further, due to the proximity to the existing Cement Australia terminal, the Glebe Island plant is expected to remove over 3,000 cement tanker truck movements.

The EIS documentation will include additional traffic modelling that will inform the overall understanding of traffic and transport impacts relating to the proposal, with particular emphasis on the key transport routes expected to be utilised by the concrete agitator trucks, including James Craig Drive and the City West Link.

It is highlighted that the location of the proposed concrete batching plant means that it may be able to gain access to major infrastructure worksites for Westconnex (and the future Western Harbour Tunnel) and throughout the Bays Precinct with minimal impacts to the local road network.

6.5 Waste Management

The waste by products generated during the concrete batching process, including cementious wash out/slurry will be managed in accordance with NSW regulatory standards. As a general principle, modern concrete batching plants collect wash down water and residual aggregates for re-incorporation into the concrete batching process, thereby largely avoiding significant amounts of cementious waste.

A suitable waste management strategy will be developed at design stage and suitable contractors engaged to handle waste. A detailed strategy will inform the EIS report and documentation, which will include measures to minimise cementious waste and reuse aggregate materials where feasible to do so. The EIS will also include a protocol for ensuring that any materials excavated from beneath the existing hardstand are suitably classified in accordance with the Waste Classification Guidelines prior to their off-site disposal at an appropriately licenced waste disposal facility.

6.6 Visual Amenity and View Impacts

The concrete batching plant will comprise silos, storage bins and conveyors, as well as buildings for administrative staff and driver amenities. The silos and conveyors may exceed the height limit specified in the Glebe Island and White Bay Masterplan, however they will be surrounded by higher existing structures – being the Anzac Bridge and the Glebe Island Silos. The new concrete batching plant facilities will be designed in a manner that is consistent with the existing port related facilities, on the basis that Glebe Island will remain as an active operational port for the lifetime of the proposed concrete batching plant.

More detailed view analysis will be undertaken as part of the EIS documentation, which will particularly consider view corridors from Pyrmont and Balmain.

6.7 Heritage

The site is located on highly impacted and reclaimed land that has been subject of extensive port related development. Assessment of Aboriginal heritage is likely to be limited to a due diligence assessment in accordance with the Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW.

Glebe Island contains a number of heritage items, including:

- Glebe Island Bridge approach
- Glebe Island Dyke Exposures
- Glebe Island Plaque- Opening of Container Terminal
- Glebe Island Sandstone Quarry Sample
- Glebe Island Silos
- Glebe Island World War II Monument

Of these, only the Glebe Island Silos are listed as being of State significance. In addition, the nearby White Bay Power Station site is of State heritage significance.

Whilst the proposed concrete batching plant is not expected to impact directly on any heritage items, it will involve development in close proximity to a number of the identified items. As such, a Statement of Heritage Impact will be prepared to accompany the EIS.

6.8 Social and Economic impact

The proposal also offers supply chain efficiencies and will reduce transport costs significantly whilst ensuring that essential construction materials are made available in proximity to the area's experiencing significant construction boom in Sydney. The proposal will also ensure that existing employment and jobs are retained within the locality.

Additionally, it is noted that Hanson intend to provide concrete to several high profile ongoing projects in proximity to Central Sydney include the Westconnex M4-M5 Link (Haberfield to St Peters) and the new M5 (Beverly Hills to St Peters) road works. This proposal will ensure continued delivery of concrete to these ongoing projects as well as meet demand relating to the anticipated redevelopment of the Bays Precinct area, and throughout Central Sydney.

The proposed relocation will also have a positive economic impact by making the existing Blackwattle Bay batching plant site available for redevelopment in line with the Bays Precinct Transformation Plan. The new facility will also complement and reinforce the existing economic activity and use of Glebe Island port.

6.9 Other Issues

The EIS would include an assessment of other issues if identified as relevant during its preparation. At this stage, other significant issues are unlikely to arise for the following reasons:

- Contamination and Remediation: The site is not undergoing a change in land use or introducing more sensitive land uses to the site. Further, the concrete batching plant will not require excavation beneath the existing hardstand except for the localised installation of footings for new silos and structures. As such, the site is expected to be considered suitable for the continuation of port related industrial development without remediation.
- Biodiversity, Flora and Fauna: The site is currently made up of hardstand and has been continuously used as part of an operating port. The site does not contain any vegetation or habitat. No further ecological assessment is considered necessary.
- Bushfire: The site is not located on or adjacent to bushfire prone land. No further assessment of bushfire risks is considered to be necessary.
- Sustainability: The proposed development aims to achieve high levels of sustainability. The EIS will set out the proposed features of environmental sustainability.
- Infrastructure and Utilities: Apart from water supply, the concrete batching plant will place minimal additional demand on existing utilities available at the site. The EIS will document the utility demand, and set out any requirement for local utility infrastructure improvements required to accommodate the new concrete batching plant – including for water supply, sewage, electricity and telecommunications.
- Hazards: The EIS will document all dangerous goods expected to be stored on site, and provide details of storage volumes and location in order to undertake a preliminary screening assessment. The concrete batching plant will not involve the storage and handling of dangerous goods in excess of the screening thresholds set out in the *Applying SEPP 33* guideline, and so a Preliminary Hazards Analysis is not expected to be required.

7.0 CONSULTATION

Hanson has been working with the Port Authority of NSW for a number of years on establishing an intermodal concrete batch plant on Glebe Island. In 2012 the Port Authority invited requests for proposals for the lease of land at Glebe Island. Hanson responded to the request for proposal and has entered into negotiations for the lease of land on Glebe Island for the purposes of the intermodal concrete batching plant. These negotiations have continued through the transfer of the Bays Precinct development process to Urban Growth NSW.

In addition to the ongoing consultation with the Port Authority and Urban Growth NSW, the following key stakeholders will be consulted during the preparation of the EIS:

- RMS: Hanson will liaise with RMS in relation to the traffic impacts arising from the use of the City West Link by concrete agitator trucks and other vehicles associated with the concrete batching plant.
- EPA: Hanson will engage with the NSW EPA, in collaboration with the Port Authority, in order to agree an appropriate assessment methodology in relation to shipping noise.
- Inner West Council: Hanson will consult with the Inner West Council in order to understand and address local issues from Rozelle and Balmain.

- City of Sydney Council: Hanson will consult with the City of Sydney Council in order to understand and address local issues from Pyrmont.
- Utilities providers: Hanson will consult with relevant local utility service providers to ensure that water supply, sewage, electricity and telecommunications are adequately available at the site.

8.0 CONCLUSION

The purpose of this letter is to request the SEARs for the preparation of an EIS for a concrete batching plant at Glebe Island. We trust that the information detailed in this letter is sufficient to enable the Secretary to issue the SEARs for the preparation of the EIS, however should you have any queries regarding this matter or require any further information then please do not hesitate to contact me on 94094933 or tward@jbaplanning.com.au.

Yours sincerely,

Tim Ward
Associate