

## Rationale of Development Proposal

As a result of the Covid-19 pandemic, state-based expenditure on infrastructure and incentives to improve economic activity has led to a significant demand for building products such as cement. However, it is noted that cement production is a high carbon emitting activity. Hanson has acknowledged that increases in resource production require greater waste recovery and emission reduction to maintain sustainable operations.

To enhance both its sustainability and workplace operations Hanson proposes to construct an additional storage silo adjacent to its current storage silo. The new silo will allow Hanson to store Supplementary Cementitious Materials (**SCM's**).

SCM can be used to improve technical characteristics including the durability, pumpability and the finish of concrete. It epitomises a sustainable way to utilise waste resource recovery through using a by-product from coal power stations, steel production and other manufacturing processes. It further reduces the net carbon emissions produced in the production of cement as less concrete is required to be added per batch resulting in less emissions.

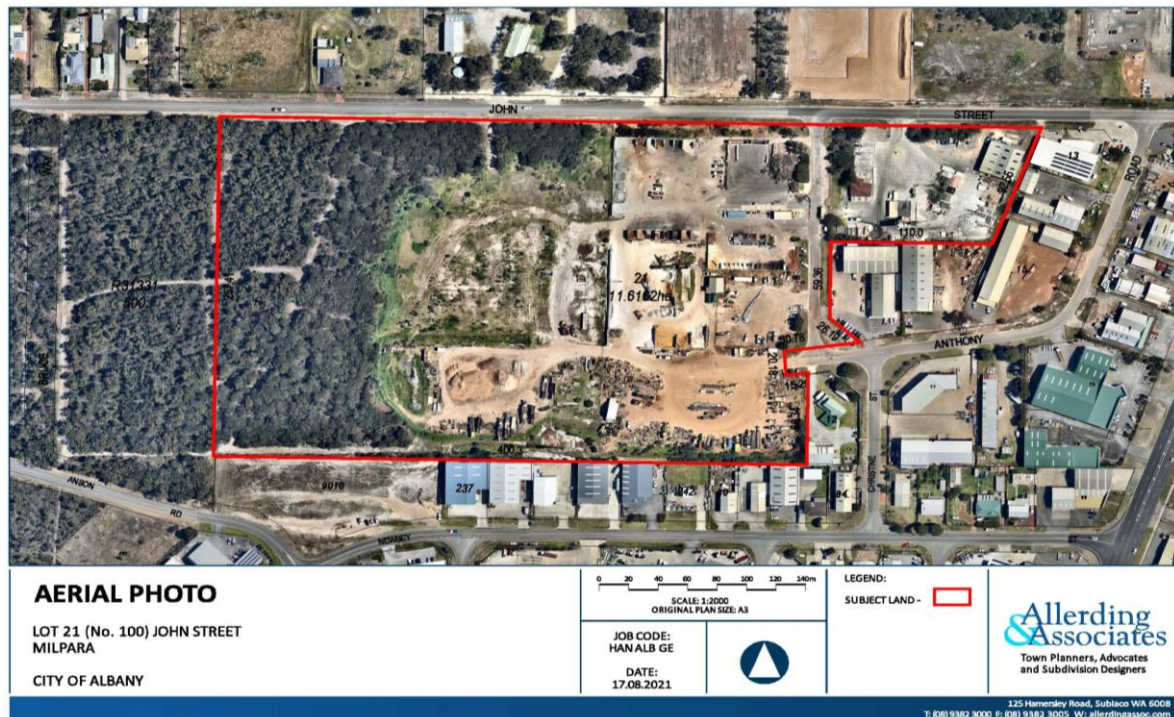
## Specifications of Development Proposal

The application proposes to install a Storage Silo with a total height of 22.27m at the north-eastern end of the Subject Site. As seen in **Figure 2** the site is surrounded by pre-existing development, predominantly industrial in nature and is not likely to have a significant adverse effect on the streetscape when viewed from the nearby residential properties.

The proposed silo will be located within the area currently used for Hanson's concrete adjacent to the existing silo on site and is located more than 70 metres from the road frontage.

The location of the proposed silo is:

- Approximately 500 metres from Residential zoned land on John Street (to the west of the Subject Site);
- Approximately 500 metres from Residential zoned land to the east, being Stirling View Drive;
- Approximately 50 metres from Residential zoned land to the north east at Brooks Garden Boulevard.



**Figure 2: Aerial Photo**

The development scope includes:

- Install new silo top filter system;
- Modify existing handrails;
- Install new silo ladders;
- Remove old box filter and replace with new;
- Install new silo monitoring systems;
- Create walkway step between silos;
- Modify load hopper to take new air slide;
- Install new footing / piles for silo support;
- Install new fill pipes and ducting;
- Connect new silo into existing air systems;
- Install double valve system;
- Install new cement weigh hopper;
- Install double valve system;
- Install new air-slide to suit;
- Manufacture and install new support legs and platform;
- Install 600mm high x 150mm concrete bund wall between silo legs and install new cladding to load bay.

To provide context of the proposals integration into the site refer to **Figure 3** and **Figure 4**. **Figure 5** illustrates the developments exterior and elevations. For a scaled version of the Development Plans refer to **Annexure 3**.

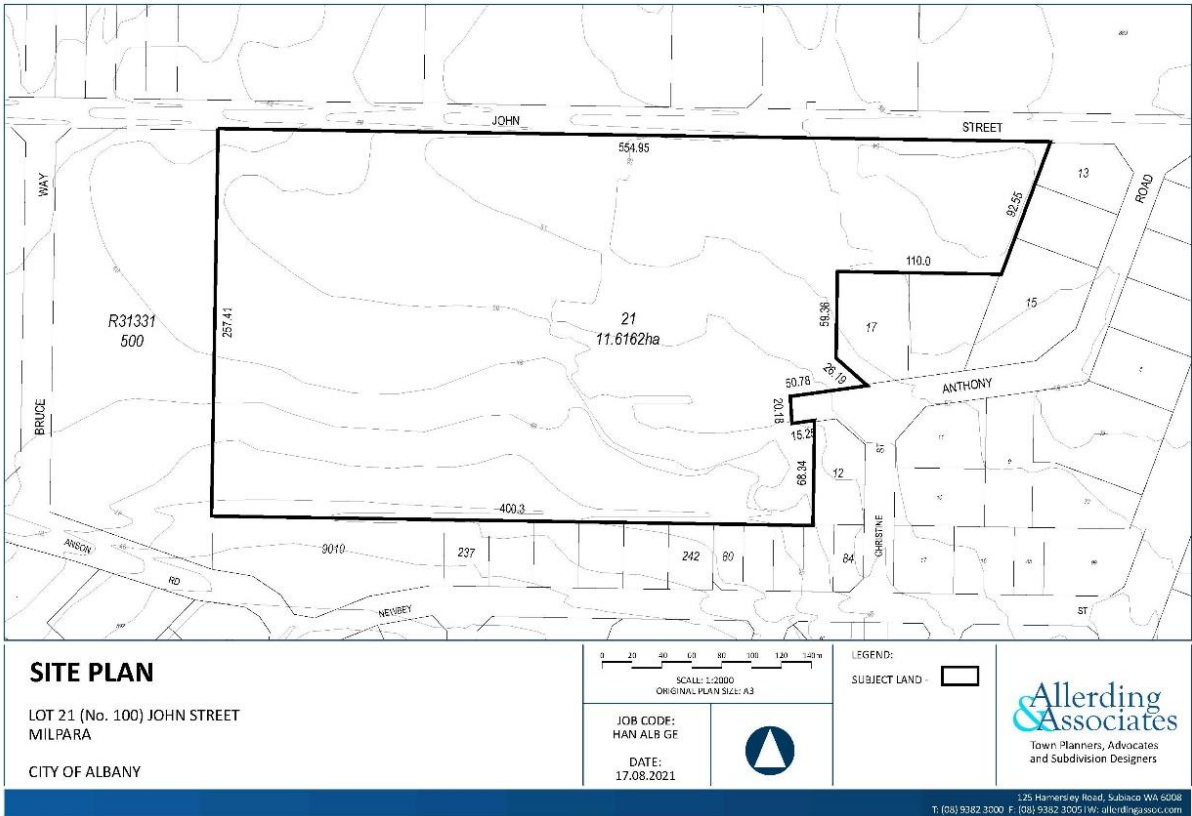


Figure 3: Subject Site

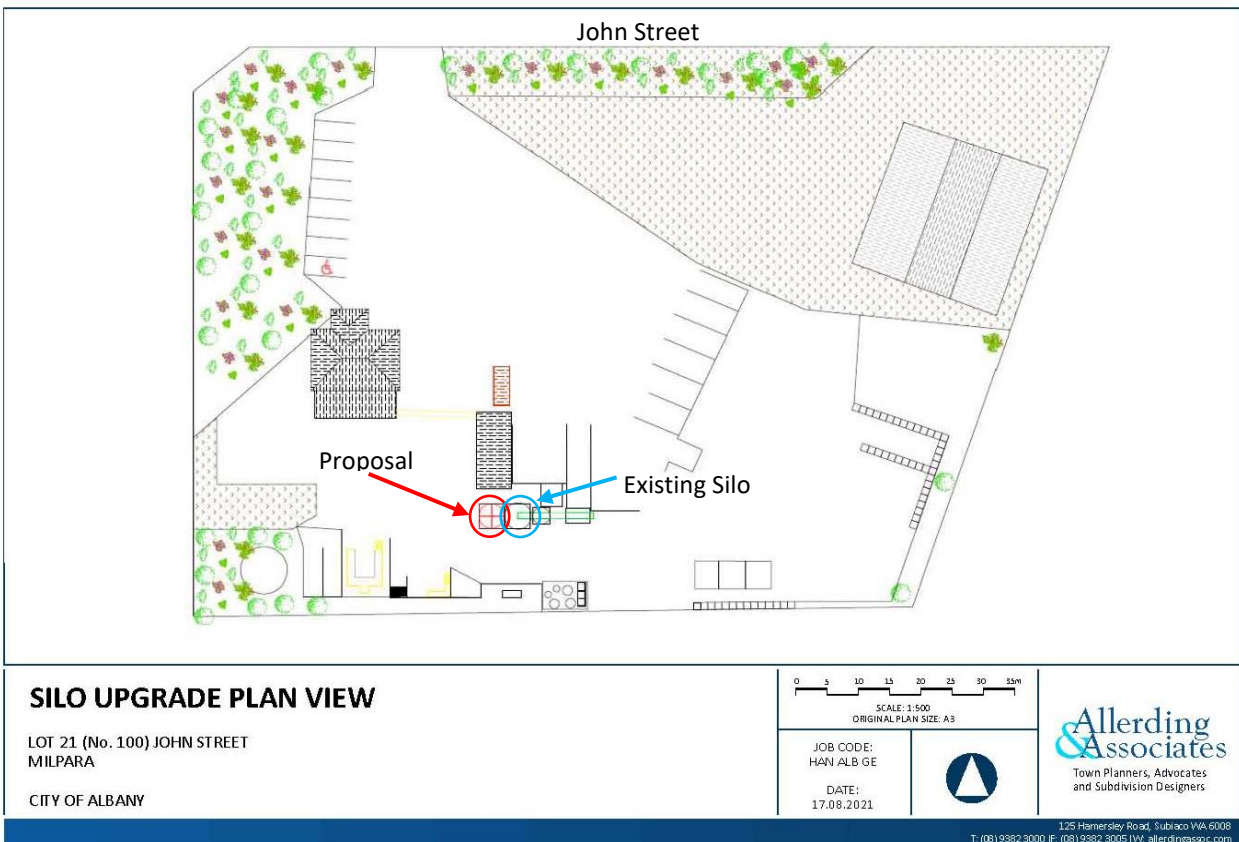


Figure 4: Site Layout and Proposal



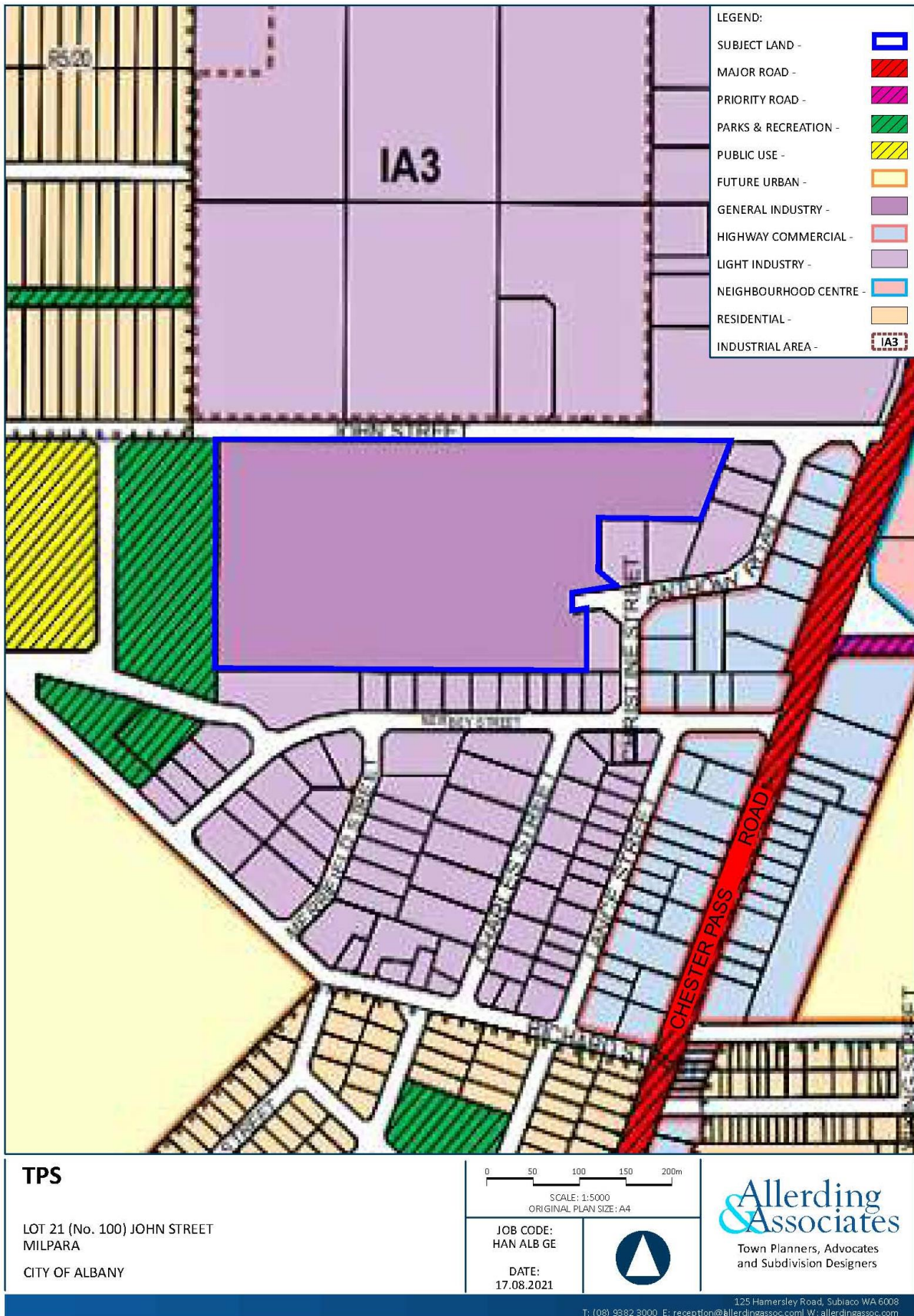


Figure 6: TPS Map

<b>Objective</b>	<b>Response</b>
b) <i>Restrict retail activities from premises to those activities that are incidental to the primary industrial function on the site</i>	Not relevant in the context of this application.
c) <i>Provide for any required buffer areas around land uses in accordance with the Environmental Protection Authority's Guidance Statement No. 3 – Separation Distances Between Industrial and Sensitive Land Uses and regulate development within the buffer area to ensure compatibility with the industrial activities and surrounding land uses; and</i>	The existing concrete batching plant operations were registered the Department of Environment in 1997 with an amended registration being issued in 2005. The proposed silo does not increase capacity of the existing operations.
d) <i>Restrict the sizes and location of signs and encourage on-site landscaping to improve the visual amenity within the zone</i>	The application does not include any new signs nor does it reduce the amount of on site landscaping.

In terms of land use, the existing land use of the concrete batching plant, would reasonably be described as Industry General and that is not proposed to change as a result of this application. Under Table 2 – Zoning Table of LPS1, the Industry – General land use is an “P” or permitted use in the General Industry zone.

## **Planning & Development (Local Planning Schemes) Regulations 2015**

The *Planning and Development (Local Planning Schemes) Regulations 2015 (the Planning and Development Regulations)* were gazetted on 25 August 2015 and came into effect on 19 October 2015. The Planning and Development Regulations have introduced a set of Deemed Provisions under Schedule 2 that now form part of LPS1 (**Deemed Provisions**).

Clause 67 of the deemed provisions deals with matters to be considered by Local Government and include the following key provisions relevant to this Development Application. Those provisions have been considered in the context of the proposal. Consideration of the proposal pursuant to Clause 67 is provided in **Table Two** below.

**Table Two: Matters to be Considered**

Matters to be considered	Comment
a) <i>the aims and provisions of this Scheme and any other local planning scheme operating within the Scheme area;</i>	The storage silo is incidental to the existing land use and is considered to be consistent with the aims and provisions of the Scheme, noting that introduction of the silo is a more sustainable approach to concrete production.
b) <i>the requirements of orderly and proper planning including any proposed local planning scheme or amendment to this Scheme that has been advertised under the Planning and Development (Local Planning Schemes) Regulations 2015 or any other proposed planning instrument that the local government is seriously considering adopting or approving;</i>	The proposal is consistent with the scheme. To our knowledge, no proposed amendments to the Scheme applicable to the site have been advertised at this time.
c) <i>any approved State Planning Policy</i>	The application considered State Planning Policy 3.7: Planning in Bushfire Prone Areas. The existing use remains unchanged and this proposal will not result in employees being on site for extended periods of time.
d) <i>any environmental protection policy approved under the Environmental Protection Act 1986 section 31(d)y;</i>	The subject site has been approved and registered under the Environmental Protection Act 1986.
e) <i>any policy of the Commission</i>	None relevant.
f) <i>any policy of the State;</i>	The proposal is consistent with Environmental Protection Act 1986 and Environmental Protection (Concrete Batching and Cement Product Manufacturing Regulations 1998).
g) <i>any local planning policy for the Scheme area</i>	Local Planning Policy: Building Facades in Industrial Zones has been addressed and considered not to be relevant to the proposal.
h) <i>any structure plan or local development plan that relates to the development;</i>	Not relevant.
i) <i>any report of the review of the local planning scheme that has been published under the Planning and Development (Local Planning Schemes) Regulations 2015;</i>	The proposal is consistent with the current scheme. No review of scheme has been published.

Matters to be considered	Comment
<p>j) <i>in the case of land reserved under this Scheme, the objectives for the reserve and the additional and permitted uses identified in this Scheme for the reserve;</i></p>	<p>Not applicable.</p>
<p>k) <i>the built heritage conservation of any place that is of cultural significance</i></p>	<p>Not applicable.</p>
<p>l) <i>the effect of the proposal on the cultural heritage significance of the area in which the development is located;</i></p>	<p>Not applicable.</p>
<p>m) <i>the compatibility of the development with its setting including</i></p> <ol style="list-style-type: none"> <li data-bbox="331 808 778 949">i. <i>the compatibility of the development with the desired future character of its setting; and</i></li> <li data-bbox="331 972 778 1256">ii. <i>the relationship of the development to development on adjoining land or on other land in the locality including, but not limited to, the likely effect of the height, bulk, scale, orientation and appearance of the development;</i></li> </ol>	<p>In regard to compatibility, the use of the site for a concrete batching plant is not proposed to change, the proposed development is considered to be compatible with the surrounding industrial setting and will be located immediately next to an existing silo.</p> <p>Due to the surrounding development being industrial in nature it is not expected to be incompatible or affect adjoining developments. An existing silo already exists on the site. Whilst the height of the proposed silo is greater than the exiting silo, given the setback to the proposed development from John Street and the distance to nearby residential zoned land, the height of the proposed silo is not considered to create an adverse impact on the amenity of the locality.</p>
<p>n) <i>the amenity of the locality including the following —</i></p> <ol style="list-style-type: none"> <li data-bbox="300 1464 778 1541">(i) <i>environmental impacts of the development;</i></li> <li data-bbox="300 1554 778 1592">(ii) <i>the character of the locality;</i></li> <li data-bbox="300 1606 778 1682">(iii) <i>social impacts of the development;</i></li> </ol>	<p>There is no proposed environmental impact as a result of the silo.</p> <p>The locality is industrial in nature and is not proposed to be impacted by the development.</p> <p>No social impacts from the development.</p>
<p>o) <i>The likely effects of the development on the natural environment or water resources and any means that are proposed to protect or to mitigate impacts on the natural environment or water resource.</i></p>	<p>No impacts to any water resources.</p>



Matters to be considered	Comment
<p>p) <i>whether adequate provision has been made for the landscaping of the land to which the application relates and whether any trees or other vegetation on the land should be preserved;</i></p>	<p>The application does not propose to remove any vegetation.</p>
<p>q) <i>The suitability of the land for the development taking into account the possible risk of flooding, tidal inundation, subsidence, landslip, bushfire, soil erosion, land degradation or any other risk</i></p>	<p>Land is deemed suitable for the development. The proposal has been assessed and for bushfire risk and deemed to be safe due to the proposal not intensifying operations.</p>
<p>r) <i>the suitability of the land for the development taking into account the possible risk to human health or safety;</i></p>	<p>Land is considered suitable for the development and all safety precautions have been integrated into the development.</p>
<p>s) <i>The adequacy of -</i></p> <ul style="list-style-type: none"> <li data-bbox="331 913 775 987">i. <i>the proposed means of access and egress from the site; and</i></li> <li data-bbox="331 1003 775 1111">ii. <i>arrangements for the loading, unloading, manoeuvring and parking of vehicles;</i></li> </ul>	<p>Access arrangements remain unchanged.</p>
<p>t) <i>the amount of traffic likely to be generated by the development particularly in relation to the capacity of the road system in the locality and the probable effects on traffic flow and safety;</i></p>	<p>The proposed silo is not considered to significantly change the numbers of vehicles attending the site.</p>
<p>u) <i>The availability and adequacy for the development of the following-</i></p> <ul style="list-style-type: none"> <li data-bbox="331 1480 699 1514">iii. <i>public transport services;</i></li> <li data-bbox="331 1532 655 1565">iv. <i>public utility services;</i></li> <li data-bbox="331 1583 775 1655">v. <i>storage management and collection of waste;</i></li> <li data-bbox="331 1673 775 1812">vi. <i>access for pedestrians and cyclists (including end of trip storage, toilet and shower facilities);</i></li> <li data-bbox="331 1830 775 1901">vii. <i>access by older people and people with disability;</i></li> </ul>	<p>Not relevant as the use is not changing.</p>
<p>v) <i>the potential loss of any community service or benefit resulting from the</i></p>	<p>Not relevant.</p>

Matters to be considered	Comment
<i>development other than potential loss that may result from economic competition between new and existing businesses;</i>	
w) <i>the history of the site where the development is to be located</i>	The existing site has a history of being used for a concrete batching plant, supplying cement to its locality. This proposal is consistent and ancillary to the existing approved uses.
x) <i>the impact of the development on the community as a whole notwithstanding the impact of the development on particular individuals;</i>	No negative impact on the community.
y) <i>any submissions received on the application;</i>	Not known at this time.
za) <i>the comments or submissions received from any authority consulted under clause 66;</i>	Not known at this time.
zb) <i>any other planning consideration the local government considers appropriate;</i>	None known.

## City of Albany Local Planning Policies

Our investigation of the City's planning framework revealed no immediate Local Planning Policies that would affect the development. We note the existence of Local Planning Policy: Building Facades in Industrial Zones. This policy has the one singular statement that states:

*The front facades of any new building or a refurbished building in all industrial zones throughout the City shall be designed to enhance the visual appearance of the building from the street. A combination of building materials is encouraged, however the use of metal sheeting on the front façade should not be the substantial material used.*

As the development is a structure and not a building with a front façade, we consider that this policy does not apply.

### State Planning Policy (SPP) 3.7: Planning in Bushfire Prone Areas

The subject site is located within a bushfire prone area as seen in **Figure 7**. Under Section 5 of the Planning Bulletin 111/2016: Planning in Bushfire Prone Areas it states:

*If the proposal does not result in the intensification of development (or land use), does not result in an increase of residents or employees; or does not involve the occupation of employees on site for any considerable amount of time, then there may not be any practicable reason to require a BAL Assessment. Exemptions may apply to infrastructure including roads, telecommunications and dams; and to rural activities, including piggeries and chicken farms which do not involve employees on site for a considerable amount of time.*

*The deemed provisions exempt renovations, alterations, extensions, improvements or repair of a building, and incidental uses*

The proposal is an incidental structure that does not intensify the use, nor will it require employees to be on site for an extended period of time. Therefore, a Bushfire Assessment has not been provided for this application.



**Figure 7: SPP 3.7: Bushfire Prone Area**

## Environmental Protection Regulations 1987

Under the Environmental Protection Regulations 1987 there is no change to the prescribed premise and the subject site will remain as category 77 and meet the required design capacities (Refer to **Figure 8**).

### **Schedule 1** Prescribed premises

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<b>Category number</b>	<b>Description of category</b>	<b>Production or design capacity</b>
77	Concrete batching or cement products manufacturing: premises on which cement products or concrete are manufactured for use at places or premises other than those premises.	100 tonnes or more per year

**Figure 8: Extract from Environmental Protection Regulations 1987**

Refer to Annexure 4 for site registration of Category 77 under the Environmental Protection Regulations 1987.

## **Environmental Protection (Concrete Batching and Cement Product Manufacturing Regulations 1998).**

The proposal will comply with all necessary provisions under the regulations with an emphasis on Section 6: *Storage of cement* and Section 7: *Air cleaning system for cement storage silo*. The storage silo has been designed in conjunction with both these sections and meets all the required design parameters as discussed in the design specifications.

## Conclusion

On behalf of Hanson Construction Materials Pty Ltd we seek Council's support for the proposed Additional Storage Silo at 100 John Street (Lot 21), Milpara. In summary:

- The Additional Storage Silo will allow Hanson to store additional cement and/or SCM's. SCM's are a cement replacement product and can include but are not limited to flyash a by-product substance from power stations and Granulated Blast Furnace Slag (GBRS), a by-product in the production of steel. The use of SCM's in the production of concrete allow Hanson to improve the technical characteristics of a concrete mix and reduce the net carbon footprint of concrete production.
- The Additional Silo will be developed immediately adjacent to the existing silo minimising its effect on the streetscape;
- Approval of the proposal would be consistent with the relevant Local and State planning frameworks.

We therefore respectfully seek the City of Albany's support for planning approval of an Additional Storage Silo at 100 John Street (Lot 21), Milpara.

Should you require any further information, please do not hesitate to contact our office.

Yours sincerely

**ALLERDING AND ASSOCIATES**



**CASEY HILL  
TOWN PLANNER**

Encl:

CC: Client



# SILO UPGRADE PLAN VIEW

LOT 21 (No. 100) JOHN STREET  
MILPARA

CITY OF ALBANY



SCALE: 1:500  
ORIGINAL PLAN SIZE: A3

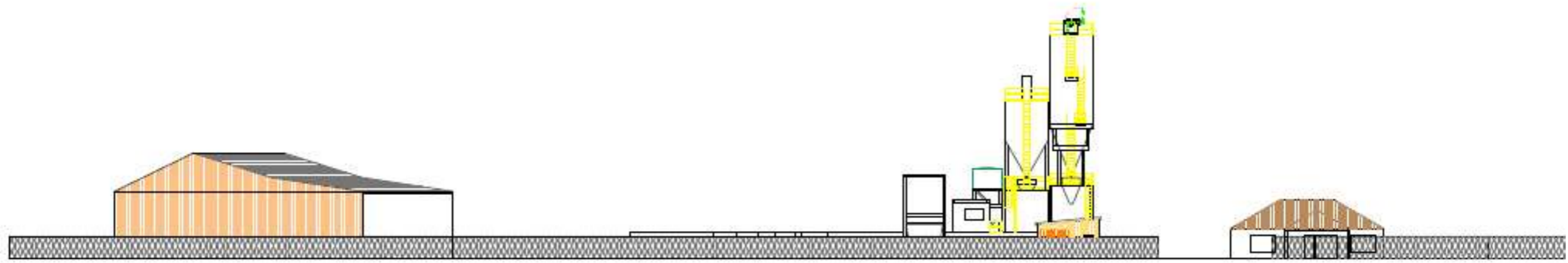
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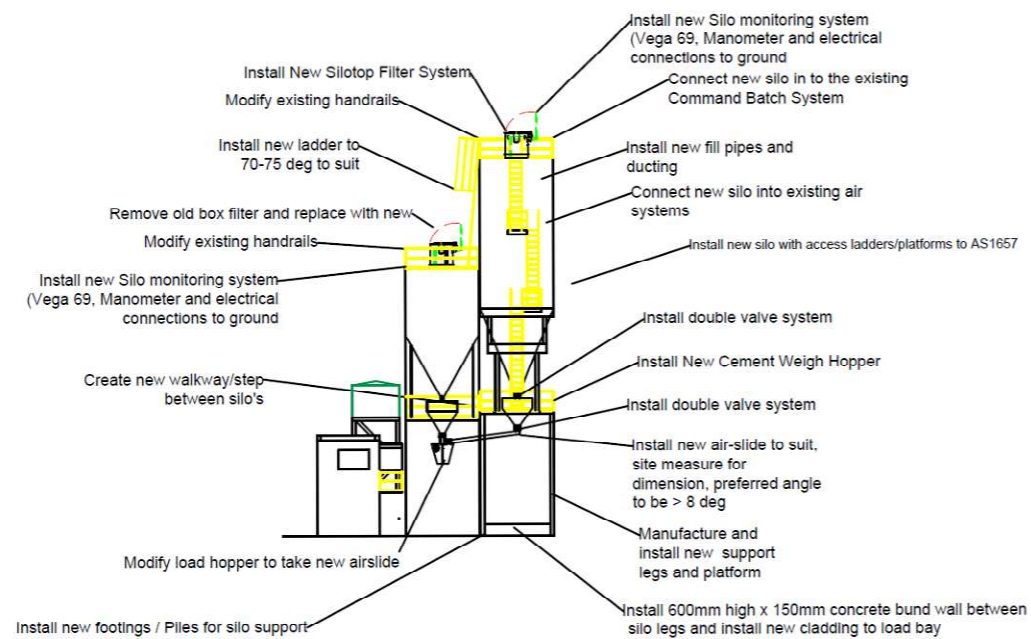
**Allering  
& Associates**

Town Planners, Advocates  
and Subdivision Designers

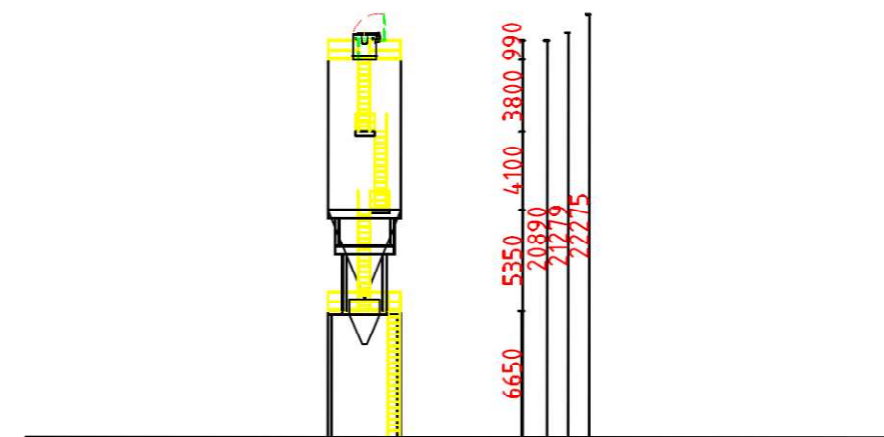


FRONT ELEVATION

SCOPE of WORKS



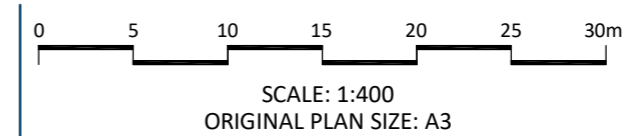
PROPOSED MT BARKER SILO LAYOUT



SILO UPGRADE ELEVATIONS

LOT 21 (No. 100) JOHN STREET  
MILPARA

CITY OF ALBANY



JOB CODE:  
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DATE:  
17.08.2021



Town Planners, Advocates  
and Subdivision Designers



1

2

3

4

6

5



Image 1

Silo obscured by trees



# Image 2



Image 3



Image 4



Image 5



Silo obscured by buildings

Stirling Steelworks

Nutrien  
Ag Solutions

Image 6



Proposed Silo

ALBANY

Farmers Centre