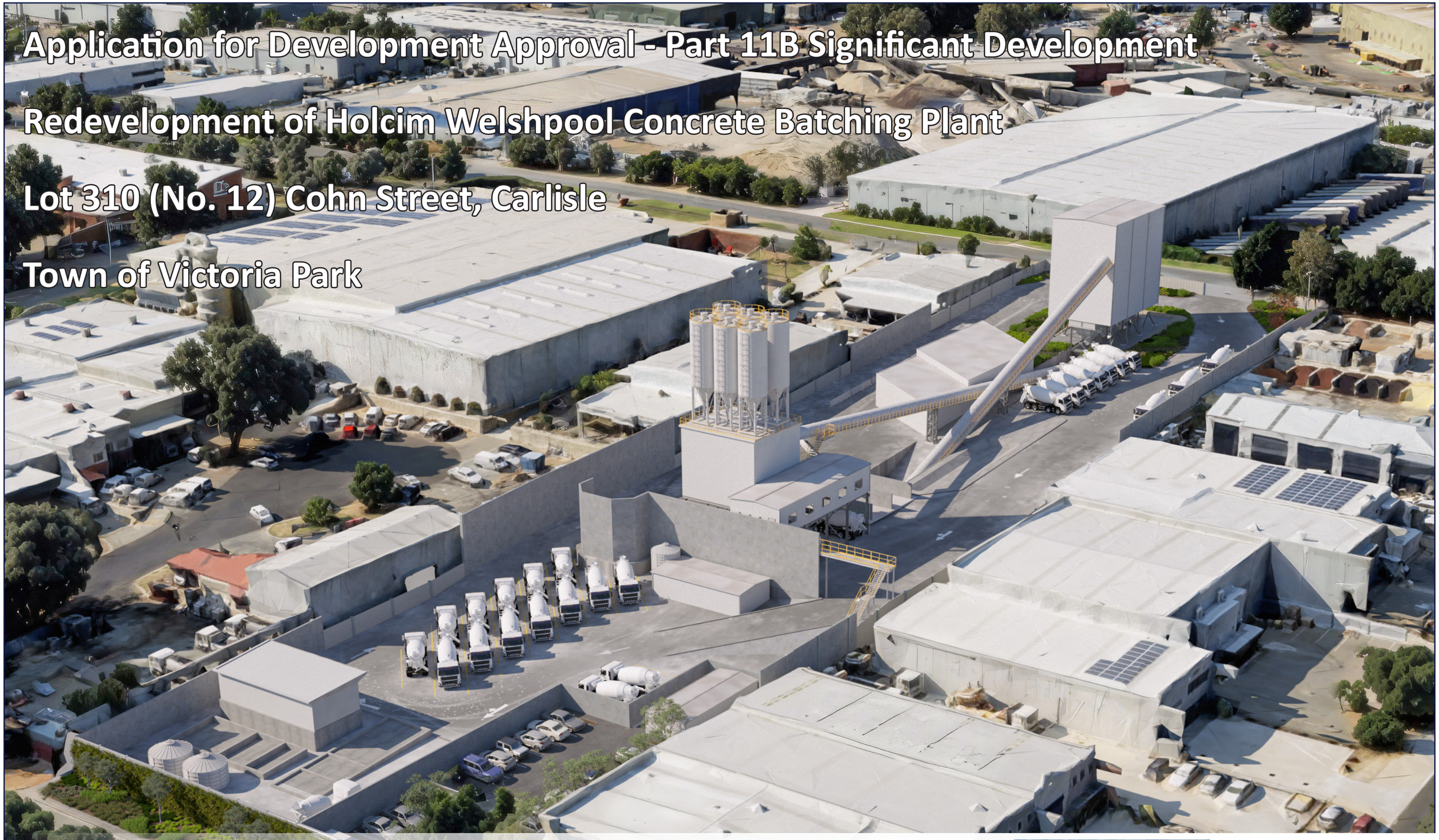
ATTACHMENT 18 - APPLICANT PLANNING REPORT

Application for Development Approval - Part 11B Significant Development

Redevelopment of Holcim Welshpool Concrete Batching Plant

Lot 310 (No. 12) Cohn Street, Carlisle

Town of Victoria Park



Prepared For: Holcim (Australia) Pty Ltd

Prepared By: Allerding and Associates

JUNE 2025 **SD-035-25**

HOLCIM

DEPARTMENT OF PLANNING, LANDS AND HERITAGE

DATE	FILE
25-Jun-2025	SD-035-25

Allerding & Associates

Town Planners, Advocates and Subdivision Designers
ABN 24 044 036 646

125 Hamersley Road, Subiaco WA 6008
T: (08) 9382 3000 W: allerdingassoc.com

CONTENTS

ATTACHMENTS

FIGURES

TABLES

Document ID: HOL CAR DA/ Part 11B Application for Holcim Welshpool Concrete Batching June 2025

Issue		Status	Prepared by:		Approved by:	
			Name	Initials	Name	Initials
1	13 June 25	DRAFT	A Butterworth	AB	S Allerding	SA
2	19 June 25	FINAL	A Butterworth	AB	S Allerding	SA

EXECUTIVE SUMMARY

We submit this Form 11B – 1 Significant Development: Application for Development Approval on behalf of Holcim (Australia) Pty Ltd (**Holcim**) seeking development approval from the Western Australian Planning Commission (**WAPC**) pursuant to Part 11B of the *Planning and Development Act 2005* (**Act**). This proposal represents a replacement Concrete Batching Plant, located at Lot (12) Cohn Street, Carlisle (**Subject Site**) that will allow the continuation of inner city operations in place of Holcim Concrete Batching Plant at Lot 1001 (No. 120) Claisebrook Road, Perth (**East Perth Plant**).

This Application is lodged on the basis that, subsequent to our written request to the Hon. Minister for Planning pursuant to s171M of the Act, the Premier has advised that he considers that the Application raises issues of such State or regional importance that it would be appropriate for the Application to be determined under Section 171 of the Act. The Hon. Premier has referred the Application to the WAPC to be considered under Part 11B, Section 171 of the Act. Refer **Attachment 1** for the Premier's correspondence authorising the Development Application to be made and determined under Part 11B of the Act. **Attachment 1** also includes the Form 11B-1 and consent letter.

A Concrete Batching Plant has operated from the Subject Site for more than 60 years, since circa 1959. The purpose of this Application is to seek approval for redevelopment of the existing facility that will enable the Concrete Batching Plant (known as the **Welshpool Plant** within Holcim and referred to as such throughout this application) at the Subject Site to accommodate a replacement facility for the East Perth Plant to enable supply focussing on inner city and infrastructure projects.

The Subject Site is key to servicing and supplying concrete for the Perth Metropolitan Area and with the closure of the East Perth Batching Plant in 2027, it is important that the Welshpool Plant is redeveloped to ensure an ongoing continuous and reliable source for the supply of Holcim's concrete contracts from this site and to support major infrastructure projects in terms of a supply of concrete products, including high specification concrete. With the closure of both batching plants in East Perth by the end of 2027, the Welshpool Plant will be the closest batching plant to the Perth Central Business District (**CBD**) to efficiently deliver high specification concrete for major infrastructure and building projects.

A key component of the proposal is to remove heavy vehicle access from Cohn Street and reconfigure the Plant layout to relocate key batching activities further east away from residential dwellings, and to provide updated technologies and new plant infrastructure. This will minimise any potential impact on properties in Cohn Street as well as minimising potential environmental impacts. Despite increases in overall throughput, with the proposed reconfiguration and use of new technology and plant, the key improvements from existing operations summarised below are intended to improve Plant operations overall and minimise any effects such that they are concentrated towards the eastern end of the site adjacent to other general industrial uses. The proposed redevelopment is planned to occur in a staged process.

Table 1 provides a summary of the key improvements as a result of the redevelopment of the Plant. As evidenced by the Summary Table, despite increased throughput, with the comprehensive redevelopment of the site and relocation of activities from the residential area and replacement with modern equipment, all externalities are expected to improve from the current situation.

We consider that the redevelopment of the site to a current modern standard will result in a better outcome environmentally and for those residents along Cohn Street.

Table 1 provides a summary of the key improvements to the Welshpool Plant.

Table 1: Summary Table of key improvements to the Welshpool Plant

Description	Existing	Key Improvements
Noise	Noisier activities (slump stand and cement tanker loading) closer to Cohn Street (residents).	Currently the Welshpool Plant contains the noisier activities to the western side of the site adjacent to the residential properties on Cohn Street. These will be relocated further eastwards away from residences and will be separated further by the use of a number of new and modified acoustic wall treatments which have been added to the revised site layout. The Application proposes to continue to use a "dry mix" process during the day, where agitators have the sand, cement and aggregate poured into the agitator at the loading bay, with water top up at the slump stand. This Application also proposes to introduce a wet mix concrete plant for night activities. A wet mix concrete plant process involves thoroughly combining aggregates, sand, cement, water, and any required additives within a fully enclosed, centrally located mixer. Upon completion, the concrete mix is directly discharged into agitator trucks for transport to the construction site. This method significantly reduces noise and dust generation because water is added at the beginning of the process, and all mixing occurs within a sealed and housed environment. As detailed in the Acoustic Assessment accompanying this Application, the operations will be fully compliant with the *Environmental Protection (Noise) Regulations 1997*. Any after-hours activities will be subject to a Noise Management Plan that requires all batching activities to be contained fully on the eastern portion of the site.
Lighting	Currently no lighting plan in place.	Improved. A Lighting Design Report and Lighting Plan has been developed and accompanies this Application. The Lighting Design Report and Lighting Plan confirm compliance with AS 4282 thus ensuring light spill does not adversely impact upon adjacent to residential properties.
Dust	No visual offsite dust. Existing aggregate bins are not enclosed and open to the air.	Improved. The new Plant will introduce a new system whereby raw aggregate and sand is delivered in a covered shed area where materials are dropped into an underground hopper and then transported via a covered conveyor system to the material bins at the Briggs Street end of the site. The material for each agitator is then weighed and transported to the aggregate loading bays by a covered conveyor system for dispatch to the agitators. The enclosed and improved measures incorporating additional dust control measures, including covered conveyors, enclosed aggregate bins, and high-efficiency filters on the cement silos will ensure delivery and storage of products that generate dust are either fully covered or subject to improved suppression. As outlined in the attached Air Quality Modelling Report, predicted concentrations are well below the National Environmental Protection Measure (**NEPM**) limits for particulates (dust).
Traffic	Cement tankers exit via Cohn Street. All other vehicles access in and out via Briggs Street.	Improved. The proposed redevelopment removes all heavy vehicles from Cohn Street. Staff car parking comprising light vehicles only is relocated to the western side of the site accessed via Cohn Street. All heavy vehicles only access and egress the site via Briggs Street. Light vehicles access via Cohn Street. The Transport Impact Statement included in this report has determined that the surrounding road network can readily accommodate increased traffic levels. A Traffic Management Plan is also provided as part of this Application.
Visual Amenity	Wall facing Cohn Street is currently 4.0m. Plant is visible. Screening vegetation in place.	Improved. Cohn Street already contains a high landscaped presentation with screening vegetation to be retained and further improved through additional landscaping along the verge. The silo that is currently visible from Cohn Street will be relocated further eastwards and the new silos will similarly be visible above the existing wall as a result of the redevelopment. However, as evidenced by the images provided in this report, the silos are not a dominant feature and the silos are likely to be further screened as the proposed verge trees grow over time. A Visual Assessment accompanies this Application which supports that the proposed redevelopment of the Plant will not have an adverse impact on the visual amenity of the locality.
Water Management	First flush water management system to contain dirty/contaminated water onsite.	Improved. A new drainage basin, wedge pits and an underground stormwater system ensures that a 1% AEP event and all contaminated and dirty water is contained and controlled on site with no offsite discharge. The onsite water management system satisfies DWER criteria. A Surface Water Assessment accompanies this Application in support of this Application.

1.0 INTRODUCTION

Holcim is seeking planning approval for redevelopment of its existing Concrete Batching Plant operations at Lot (12) Cohn Road, Carlisle (**Subject Site**). Refer to **Attachment 1** for a copy of the Form 11B – 1 Significant Development and correspondence from the Premier authorising that the application be made and determined under Part 11B of the Act.

The redevelopment of the site will result in rearrangement of activities on site with a key focus on minimising the potential for impacts to surrounding properties and improved environmental outcomes.

The Plant redevelopment will include:

- Construction of a new Concrete Batching Plant with a reconfigured Plant layout including relocating the noisier activities further from Cohn Street and relocating the silos further from Cohn Street such that the visual impact of the silos is mitigated;
- Removal of all heavy vehicle access from Cohn Street;
- Construction of new facilities for the storage of aggregate and the associated equipment for the supply of concrete to the market, including the inner city area and for major infrastructure projects;
- The Plant to continue to be able to operate 24 hours per day, seven days a week, if required to enable supply outside standard hours for inner city and infrastructure projects that can require evening and early morning pours of concrete;
- Provision of a new driver's room building including upgraded amenities for staff on site;
- Upgraded facilities for parking, garaging and washing out of agitators (concrete trucks); and
- Formal carparking area for employees, production staff and visitors.

The following provides a brief snapshot of the proposal:

- Increased annual production from 110,000m^3 (approximately 250,000 tonnes per year) to 300,000m^3 (approximately 700,000 tonnes per year), producing grey concrete only.
- The design of the Plant complies with the *Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998*;
- Increased total number of vehicle movements, but with modification to the access agreements with all truck/heavy vehicle movements being via Briggs Street and only passenger/light vehicle movements via Cohn Street;
- Continued potential for night time operations, when required;
- A comprehensive Acoustic Assessment report as well as a Noise Management Plan have been prepared to accompany this Application. This redevelopment will reconfigure the site to relocate the noisier activities closer to Briggs Street (further removed from residential properties) and includes the construction of a number of acoustic walls as well as the introduction of a wet mix plant during night operations, which combined ensures that operations will be compliant with the *Environmental Protection (Noise) Regulations 1997*;

- A Lighting Design Report and Lighting Plan accompany this Application, which confirm compliance with Australian Standard 4282 (**AS 4282**) thus ensuring light spill does not adversely impact upon adjacent to residential properties;

- As part of this Application, the loading bay will be capable of being enclosed on three (3) sides and aggregate bins will be enclosed or underground. Air quality modelling has also been provided which results in the predicted concentration of dust particulates being well below the National Environmental Protection Measure (**NEPM**). An Air Quality Management Plan also accompanies this Application;

- Increased landscape planting and screening along the verges of both Cohn Street and Briggs Street;

- The existing screening wall to Cohn Street and the relocation of the taller plant further from Cohn Street will minimise the visibility of the new Plant from Cohn Street; and

- Improved on site water management with increased efficiency and recycling.

Refer to **Attachment 2** for the Development Plans subject of this Application.

Attachment 3 provides the Landscape Plan to accompany this Application.

Attachment 4 provides a Feature Survey of the current development on site.

Figure 1: Holcim Agitator
(Source: ourdreamhomeproject.com/Holcim-Australia)

2.0 BACKGROUND

Holcim advises that the Subject Site has operated as a Concrete Batching Plant since 1959. **Table 2** provides a list of the previous planning approvals for the Site.

Table 2: Previous Planning Approvals

Date	Planning Approval
February 2015	Addition of slump stand and wedge pit to existing Concrete Batching Plant.
June 2015	Demolition of the existing site amenities building.
March 2017	Retaining wall, administration office, front fence and carpark additions to the existing Concrete Batching Plant.
May 2021	Development Approval issued by the Joint Development Assessment Panel for redevelopment of the existing Concrete Batching Plant, including 24 hour per day operations and redesign of the Site with an alternative layout. *This approval has not been enacted to date, but is valid with substantial commencement by May 2027.*

Refer to **Attachment 5** for a copy of the letter of Development Approval issued by the Metro Inner South Joint Development Assessment Panel dated 21 May 2021 and the stamped approved plans for the redevelopment of the Welshpool Plant. This approval has not been enacted to date, but remains valid until May 2027.

The Site has a current Environmental Approval for the existing Concrete Batching Plant operations. A Notice of Amended Registration was issued by the Department of Environment and Conservation, pursuant to the *Environmental Protection Act 1986* and that Amended Registration was issued to Holcim for a premises described as Schedule 1, Category 77: Concrete Batching or Cement Products Manufacturing, noting that the registration commenced on 1 October 1996 (the date that the Site was acquired by Holcim).

On 24 August 2021, Holcim applied to the Department of Water and Environmental Regulation (**DWER**) for a Works Approval to construct the Plant that was subject of the Planning Approval granted in May 2021. Works Approval W6587/2021/1 was issued by the DWER in January 2022.

On 31 July 2024, Holcm submitted an Application to the DWER to amend the Works Approval specifically to extend the time frame for construction of the redevelopment of the Plant that was subject of the Works Approval issued in January 2022. On 31 October 2024, DWER issued an amended Works Approval which is valid until 18 January 2027 for construction of the Plant. The Works Approval is subject to a list of conditions addressing:

- The construction phase including construction of the approved plant, infrastructure and equipment as per the approved design and compliance reporting;

- Environmental commissioning phase including submission of an Environmental Commissioning Report and conditions relating to air quality monitoring, ambient dust monitoring and ambient noise monitoring; and

- Recording and reporting.

Upon receipt of the abovementioned reports after commissioning of the Plant, DWER would then determine whether the Plant would continue to operate under the existing registration.

As the design of the Plant has changed as a result of this Application, a new amendment to the Works Approval is required to be lodged with DWER upon receipt of Development Approval for this proposal.

3.0 SITE DETAILS

3.1 Subject Site

The Subject Site has a land area of 1.0321 hectares with frontage in excess of 50 metres in width to Cohn Street to the west and Briggs Street to the east. The particulars of the subject Site are described in **Table 3**.

Table 3: Site Details

Lot Number	Street Address	Deposited Plan	Volume	Folio
310	12 Cohn Street	34532	2223	197

The Certificate of Title includes reference to a memorial advising that the Site has been classified under the Contaminated Sites Act 2003. The Memorial specifically advises that this Site has been classified "Remediated for Restricted Use." Schedule 1 of the Contaminated Sites Act 2003 outlines that the criterion to fit within this category is that the Site is contaminated but has been remediated so that it is suitable for restricted use.

A copy of the Certificate of Title, Deposited Plan and Memorial are included in **Attachment 6**. **Attachment 7** contains a plan showing the sites in the locality that are classified as "Remediated for Restricted Use" and the Contaminated Sites Act 2003: Basic Summary of Records Seach Response (**Response**). The Response details that should the Site be proposed for a more sensitive land use, this will trigger the need for further investigations and risk assessment. As the land use is not changing, there is no requirement for further investigation and/or risk assessment.

A Feature Survey of the current development on site is provided at **Attachment 4**.

3.2 Location and Context

The Subject Site is located approximately 6.0km south east of the Perth Central Business District and is located within an existing industrial area. Refer **Figure 2**: Location Plan.

The Site has dual frontage to both Cohn Street to the west and Briggs Street to the east. The land to the north west, on the opposite side of Cohn Street is residential in nature with a mixture of single and grouped dwellings.

The abutting land to the north and south is industrial in nature. The lots to the east include industrial properties fronting Savill Place, Hume Doors and Timber fronting Briggs Street, Capital Recycling further east along Briggs Street and FedEx Express Shipping warehouse located on the opposite side of Briggs Street.

The land to the south east of the Subject Site is located within the City of Canning and also contains industrial type uses.

The Site has a crossfall of approximately 10 metres, with the natural ground level at the Cohn Street end being in the vicinity of 15.5m RL and the natural ground level at the Briggs Street end of the site being approximately 25.0m RL.

With dual frontage to the lot, it is proposed to have access to the site via Cohn Street for staff (passenger/light) vehicles only with all industrial traffic accessing the site via Briggs Street (to the south) to access Orrong Road.

Figure 3 provides indicative routes to the Perth CBD to deliver high specification concrete to the Perth CBD. The figure affirms the capacity for heavy vehicles to access the CBD without having to use residential streets.

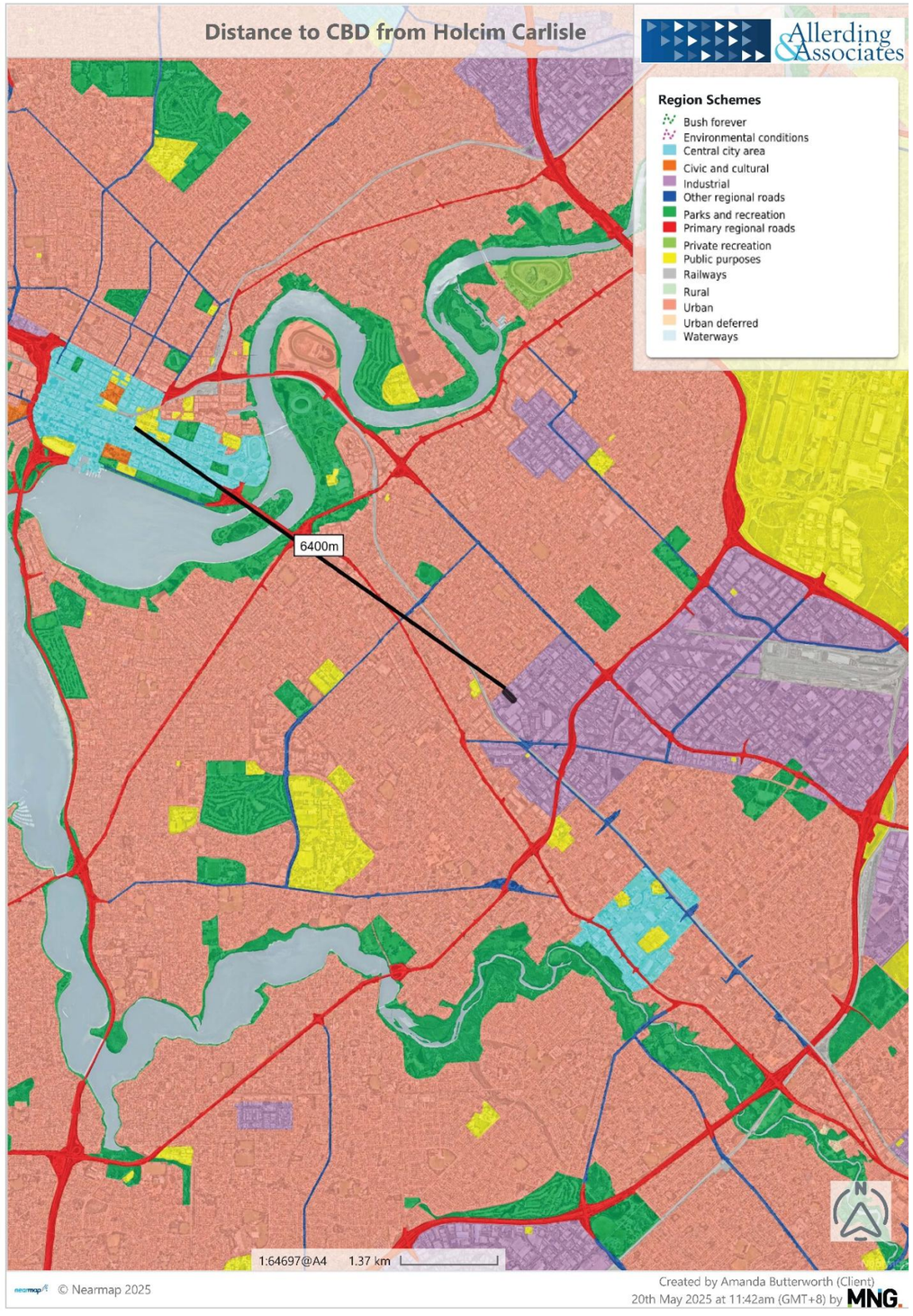


Figure 2: Location Plan and distance from the Subject Site to the Perth CBD

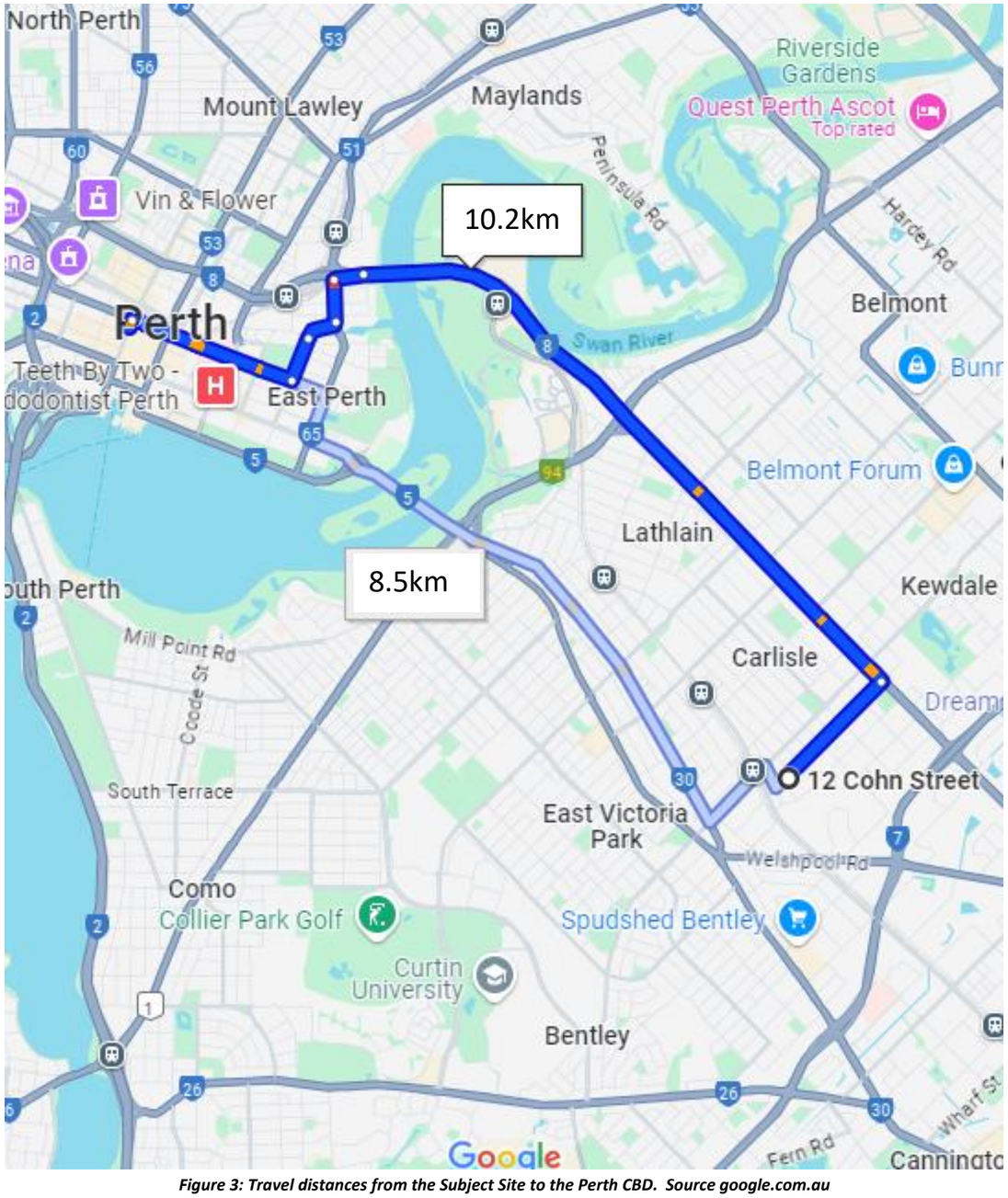


Figure 3: Travel distances from the Subject Site to the Perth CBD. Source google.com.au

3.3 Land Use

The Site is currently approved for use as a Concrete Batching Plant. Whilst a Concrete Batching Plant has operated from the Site for over 60 years, Holcim has operated at the Site since 1996. Refer **Figure 4** for an Aerial Photo showing the existing operations. It is proposed to continue the use of the Site as a Concrete Batching Plant, but this Application seeks approval for redevelopment of the infrastructure on Site to a modern standard with the intent to reduce emissions and impacts when comparing the emissions and impacts of the existing dated facilities to the emissions and impacts of the proposal. It is also proposed to increase the capacity of the Plant as part of the redevelopment and for the Plant to provide grey concrete only. Therefore, it is not intended to change the land use, it is proposed to continue to operate under the approved land use being a Concrete Batching Plant.

The previous approval for the Batching Plant was issued under the Town of Victoria Park Local Planning Scheme No. 1. Whilst the Town of Victoria Park Local Planning Scheme No. 1 deemed a Concrete Batching Plant to be a Noxious Industry. Under the now operative Town of Victoria Park Local Planning Scheme No 2 (**LPS2**), the land use would reasonably be classified as "Industry". The "Industry" land use is defined as follows:

> *means premises used for the manufacture, dismantling, processing, assembly, treating, testing, servicing, maintenance or repairing of goods, products, articles, materials or substances and includes facilities on the premises for any of the following purposes –*
>
> *(a) the storage of goods;*
> *(b) the work of administration or accounting;*
> *(c) the selling of goods by wholesale or retail;*
> *(d) the provision of amenities for employees;*
> *(e) incidental purposes*

Figure 4: Aerial Photo of Existing Concrete Batching Plant

3.4 Servicing

Servicing to the Subject Site is detailed below:

(a) A sewer connection exists from the Cohn Street verge. The development is connected to sewer at Cohn Street, with the connection point being to the north of the proposed driveway access. The sewer line extends along the western boundary of the Subject Site, with the sewer line being located within the Subject Site at the rear of 10 Cohn Street and then is located in the rear of the adjacent properties for the majority of the length of the western side boundary (4-16 Downing Street);

(b) All reticulated water services are located on the opposite side of Cohn Street and Briggs Street. The Subject Site is connected to reticulated water;

(c) The Western Power connection point is at the Cohn Street frontage of the property and low and high voltage distribution overhead powerlines are located on the opposite side of Briggs Street. A new transformer/power box is required in order to provide a more stable and secure power source for the Site. The power/transformer box is proposed to be located in the north western corner of the property, adjacent to Cohn Street;

(d) An ATCO distribution pipeline (critical asset) is located on the Briggs Street verge of the property. Holcim is aware of their obligations to seek approval from ATCO prior to any excavation and/or any within the Briggs Street verge and/or within 15 metres of the critical gas asset;

(e) NBN infrastructure is located within the Cohn Street verge and NBN private services for Holcim extend into the property. Holcim is aware of their obligations in regard to any work near the NBN infrastructure;

(f) Telstra infrastructure is located within the Cohn Street verge and private telecommunication services for Holcim extend into the property. Holcim is aware of their obligations in regard to duty of care for any work near the Telstra infrastructure; and

(g) Holcim is aware that a Work Zone Permit Application to the Town of Victoria Park is required for any work that obstructs a verge; and

(h) Holcim has Licence To Take Water GWL150782(5) from the DWER to abstract up to 24,000 Kilolitres of water for Concrete Batch Plant purposes.

3.5 Existing Concrete Batching Plant Operations

At its most basic level, batching concrete has been described as like baking a cake, in so far as the ingredients are all delivered and stored separately in secure containers and only come together, and mixed with water, when it is necessary to batch the concrete. A Concrete Batching Plant primarily places a measured mix of cement, sand, aggregate and water within an agitator truck, which is then mixed by rotating the agitator bowl to produce concrete. **Attachment 4** provides a Feature Survey of the Site where the different elements of the current operations are shown.

The existing operations currently stores sand and aggregate in open above ground bins and the cement is stored in the silos. The existing operations have regular truck deliveries of sand and aggregate raw materials where the delivery trucks currently reverse and then tip the tray of the truck in the open to then deliver the raw material into the above ground bins (for decorative concrete) or to the in ground tipper bins (for grey concrete). The cement is delivered by truck delivery and is transferred direct to the silo in a pressurised manner. All cement tankers leave the Site via the gated access on Cohn Street.

As required, the sand and aggregate are collected via the front end loader and transferred to the aggregate weigh hopper for decorative mixes which is then transferred to the Batching Plant building via conveyor or collected directly by the aggregate conveyor for grey concrete mixes.

The agitator is reversed into the Batching Plant building where the measured aggregate, sand, cement and water is placed in the agitator in the loading bay. Additional water may be added separately to the mix within the agitator to ensure that the mix is to the required specification, this is undertaken at the slump stands that are presently located at the Cohn Street end of the site near the western side boundary. Once the concrete is at the required consistency, the agitator truck leaves the Subject Site via the Briggs Street exit to deliver the concrete to site. After delivery of concrete at the job site, the empty agitator truck travels back to the Plant, is washed out in the wash down bay, located at the Cohn Street end of the Welshpool Plant and then gets refilled with concrete for the next job.

Water from the wash down area is recycled on site. The Water Management System is located at the Cohn Street end of the Site. Refer **Figure 5** for an image of the current operations.

The existing operations produce decorative concrete as well as grey concrete. As part of this Application, to fulfil its function as a replacement Plant for East Perth, decorative concrete will no longer be produced on this Site.

Figure 5: View of existing operations with Briggs Street in the foreground and Cohn Street at the back of the image

4.0 PROPOSED DEVELOPMENT

The development consists of a number of components, which will be constructed in stages in order to minimise disruption and ensure the ongoing supply of concrete from the Site.

In regard to demolition of structures, a demolition plan is provided in **Attachment 2**. The demolition plan identifies all structures to be removed, noting that the buildings to be demolished will be removed in stages in order to minimise disruption to the existing operations.

Stage One

- Demolition of the existing site office and light vehicle carpark;
- Construction of new internal traffic lane on the north eastern boundary, and modify the access to Briggs Street to create a second crossover to separate entry and exit vehicles. The new crossover will be constructed at the northern end of the Briggs Street frontage to the Site;
- Construction of the new road and slump stand pavement at the Briggs Street end of the Site;

Stage Two:

- Demolition of the existing decorative concrete ground bins;
- Installation of the new Batching Plant building including load bays, construct the underground aggregate delivery bin 1, the aggregate batch conveyor and aggregate storage building;
- Construction of new wedge pits and the drainage basin adjacent to the aggregate batch conveyor;

Stage Three:

- Construction of noise walls, retaining walls;
- Construction of a light vehicle carpark and ablutions buildings including infiltration storage under the proposed light vehicle carpark;

Stage Four:

- Demolition of the old Plant;
- Construction of the new ramp;
- Construction of the underground aggregate delivery bin 2;
- Upgrading of the landscaping on site and to the verges of Cohn Street and Briggs Street.

4.1 Concrete Batching Plant Processes

The processes undertaken on Site, being the process of concrete production via the mixing of aggregate (sand, gravel and crushed stone) and slurry (cement plus water) remains unchanged. What is proposed to change is the location of those activities on Site (to place noisier activities at the Briggs Street end of the Site) and to introduce new modern equipment in the processes undertaken on Site. The new equipment is aimed at reducing the potential noise and dust emissions from the Site, as well as increasing efficiencies.

As part of this Application, given the increase in production capacity, decorative concrete will no longer be produced on this Site. All concrete produced at the Subject Site will be grey concrete, including high specification concrete. Concrete has a limited shelf life starting from the commencement of batching to the time that the concrete is delivered and poured at its destination. The shelf life ranges generally from 60 to 90 minutes depending on the specification of the concrete required with high specification concrete having a shorter shelf life. Given the introduction of production of high specification concrete at this Plant and the increased volumes, the new Plant arrangement maximises efficiencies as well as minimising dust and noise.

4.1.1 Deliveries

All trucks will enter the Site at Briggs Street from a new crossover located on the southern corner of the Site. Refer to the traffic circulation plan in **Attachment 2** which shows the cement tanker and tipper truck (delivery vehicle) paths. The Concrete Batching Plant will receive aggregate and sand from tipper trucks (which enter the Site from the southern access point on Briggs Street). All sand and aggregate deliveries are made into one of the two centrally located aggregate delivery bays on Site. Once a delivery truck is positioned over the underground receiving bins, the tray of the delivery truck is raised to unload the material into the bins marked 'Aggregate Delivery Bins'. Once the truck is emptied, the delivery trucks then follow the traffic circulation plan to exit the Site from the proposed exit at the northern end of Briggs Street.

The cement delivery trucks follow the cement tanker path as shown on the traffic circulation plan in **Attachment 2**. The cement tanker will enter the Site from the southern access point on Briggs Street then proceed to cement silo lane 1 or cement silo lane 2. Once in position, the cement tanker is pressurised to pneumatically transfer the cement into the silo in a sealed pressurised manner. As the transfer system is sealed, no cement dust can escape during transfer of the cement from the tanker to the silo. Once emptied and decoupled from the cement silo, the cement delivery trucks then exit in accordance with the traffic circulation plan and leave the Site from the proposed exit at the northern end of Briggs Street.

4.1.2 Raw Materials Storage and Transfer

The aggregate and sand, once delivered to the aggregate delivery bins, is transferred to the aggregate storage building, located at the Briggs Street end of the Site. The sand and aggregate is transported along the automated aggregate delivery conveyor to storage silos at the Briggs Street end of the Site. This is illustrated on the Layout Plan in **Attachment 2**. The aggregate storage building consists of a series of four sided silos in a covered configuration that provide for covered storage of materials. Different silos are used to store different sized aggregates and the size of the aggregate is dictated by the requirement of each individual order.

When an order is to be fulfilled, the appropriate sand and aggregate is released from the aggregate storage silos into the aggregate weigh hoppers located underneath the silos. The sand and aggregate are then transported from the aggregate storage building to the Plant building by the aggregate batch conveyor. The aggregate batch conveyor is automated and covered. From the conveyor system, the aggregate and sand are then transported to fully enclosed holding hoppers to be mixed with water and cement into the agitators.

4.1.3 Batching

Agitators are parked in the agitator waiting bays until their truck number is called/displayed. Once the job for the agitator is called, the agitator proceeds to the required loading bay (lane A or B). The plant includes two loading bays. Each of the loading bays are fully enclosed with automated doors that close once the agitator is in position and prior to loading commencing.

The control room directs the Batching Plant to mix the required amount of aggregate, sand, water mixture, and any additives (if required) in the load out bay to the required concrete specification. Once the agitator is in position in the loading bay, and the automatic door is closed behind the agitator, the mixture (of sand, aggregate, cement

and water) is transferred into the agitator and mixing of the concrete within the agitator commencing within the loading bay.

During day time operations, after batching, the agitator exits the loading bay and proceeds to the slump stands, where more water will be added to the concrete mixture to ensure that the required consistency of the concrete is reached.

During night time operations, a wet mix process will be used. This involves thoroughly combining aggregates, sand, cement, water, and any required additives within an enclosed, centrally located mixer. Once mixing is complete, the concrete is directly discharged into agitator trucks for immediate delivery to the construction site. In most cases, the agitators can depart without needing to stop at the slump stand, as additional water is typically not required. When a new concrete mix is being introduced, this may, on occasion, require a small amount of water to be added to the agitator at the slump stands prior to exiting the property at the northern end of Briggs Street. However, in all batching activities during the night time hours (predominantly 10pm to 7am), the wet mix batching process will be used and in almost all deliveries, the agitator will leave the premises without the need to add water at the slump stand, minimising noise impact.

Once the agitator has delivered the concrete, it returns to Site and the truck is washed out, prior to then parking and awaiting the next order. During day time operations, washing of the agitators occurs at the wash out area at the Cohn Street end of the Site. Once washed if there are more deliveries for that agitator, it will use the internal accessway on Site to then return to the agitator parking/waiting bays, on the southern side of the Subject Site. During night operations, all washing of agitators occurs in the north western most slump stand (closest to Cohn Street) as this provides the best noise mitigation being immediately behind the noise barrier.

4.1.4 Parking

As outlined above, agitators are parked in the waiting bays during the day.

At the end of the day, once deliveries of concrete are complete and the agitator is washed out, the agitator is parked at the northern end of the Site in an agitator parking bay. Noting that there is a crossfall on the property from Briggs Street down to Cohn Street, the agitator parking area is accessed via a ramp on the southern side of the property.

4.2 Proposed Structures

The Application proposes various structures as part of this Application, which are summarised below.

4.2.1 Batching Plant, Conveyors and Aggregate Storage

The Batching Plant building includes:

- Two (2) loading bays which the agitators drive into and have automated doors which are automatically closed behind the agitator when the agitator is in place to enclose the bay on three sides, noting that there is an automated dust extraction system for the loading bays when agitators are loading;
- Up to Six (6) Cement silos with a maximum total height of 31m to the apex of the silos;
- Fully enclosed holding hoppers to hold the raw materials prior to batching;
- The batch office, where the staff control what raw materials are placed in each batch of concrete; and
- Two (2) cement lanes where delivery trucks transfer the cement from the truck into the silos, noting that the cement delivery area is covered.

Refer **Figure 6** for a photo of the loading bay facility at Holcim's Epping Plant which is similar to that proposed in this application.

Figure 6: Holcim's Epping loading bay facility

The aggregate storage building consist of a number of four sided storage silos with weigh hoppers underneath. The building will be clad in metal and has a total height of approximately 20.38 metres above the proposed finished ground level adjacent to the aggregate storge building.

The conveyors between the Batching Plant and aggregate storage building will be enclosed and metal clad, similar to what is seen in F**igure 7.**

Figure 7: Covered conveyors at Holcim's Footscray Plant

4.2.2 Slump Stands

After the agitator has received the mix of cement, water, sand and aggregate in the loading bay, water is added to the agitator so that the consistency of the concrete is to the correct specifications. This process is carried out at the slump stands, located adjacent to the conveyors. The Application proposes five slump stands. The slump stands have walls on the southern end and the northern side and is roofed. The walls and the roof are to assist with noise mitigation.

During night time operations, water will be added when the agitator is located within the enclosed loading bay. This is referred to as "wet mix batching". While the wet mix batching process is a longer process, this minimises noise, by removing the requirement for agitators to use the slump stand, which is particularly important for night time operations.

4.2.3 Noise Walls

The Application proposes a number of noise walls to mitigate off site noise impacts. Details of the noise walls are shown on the plans in **Attachment 2**. The noise walls include:

- Retention of the existing noise wall along Cohn Street that measures 4 metres in height with installation of new 1.5m slant back panels installed and a noise insulated gate of 4 metres in height to give access to the proposed light vehicle carpark.

- Four (4) and seven (7) metre high noise walls on sections of the side boundaries where neighbouring buildings do not provide noise attenuation;

- Four (4) metre noise walls surrounding all sides of the light vehicle carpark, with personnel doors that provide access between the carpark/ablutions and the Batching Plant, together with a slant back installed along the Cohn Street frontage to the carpark. The carpark will have an operable gate to Cohn Street that will be 4 metres in height;

- Introduction of a noise wall measuring eight (8) metres in height central to the Site, noting that the 8 metres in height is measured from the finished ground level adjacent to the Batching Plant building.

- Noise walls on all three external sides of the slump stands with another noise wall located internally on the last slump stand closest to Briggs Street. The slump stands will also be roofed.

- The washout bays will be enclosed on three sides and be roofed.

Photos of the existing noise wall on Cohn Street and view of the existing Batching Plant structure is provided in **Figure 8** with **Figure 9** showing the view of the proposed plant from Cohn Street.

4.3 Traffic Generation, Vehicular Access and Vehicle Movements

At present, the Subject Site has vehicular (commercial and passenger) access to both Cohn Street and Briggs Street, with no separation of access for light vehicle from trucks (agitator and delivery trucks). As part of this Application, it is proposed to revise the access arrangements such that there is one singular access to Cohn Street, for passenger vehicles only and that access is being relocated to the north western side of the Site, as shown in the Development Plans provided at **Attachment 2**. The proposed carpark located adjacent to Cohn Street would be utilised by on site staff and drivers of the agitators. The change to only passenger vehicles accessing Cohn Street takes into account that there are residential land uses immediately opposite the Subject Site.

All agitators, delivery vehicles and any heavy vehicles will access the Site via Briggs Street only. It is proposed to modify the access arrangements to Briggs Street to separate incoming and exiting heavy vehicles. The western crossover to Briggs Street will be used for entry only and vehicles will exit via the eastern crossover to Briggs Street.

The proposed vehicle access arrangements provide for a new crossover and new egress location for outgoing vehicles located at the eastern side of the Briggs Street frontage. It is noted that the crossover to the adjacent property to the east (at 65 Briggs Street) has an existing crossover that is located 6.0 metres to the east of this proposed crossover. Therefore, the location of the proposed egress from the Subject Site being alongside the eastern side boundary will not affect the existing access arrangements to the Site to the east. As can be seen from the Development Plans at **Attachment 1**, the splay to the crossover is contained within the verge of the Subject Site.

Heavy vehicles entering the Site will access the Site via the modified access point on Briggs Street.

The property to the immediate west, 16 Downing Street, Carlisle has its crossover to Downing Street, so the proximity of the proposed crossover will not adversely impact upon the access arrangements to the adjacent property at 16 Downing Street.

Figure 8: Current view from Cohn Street, noting the silos are visible above the existing front fence

Figure 9: View of proposal from Cohn Street, noting the silos are similarly visible above the existing wall on Cohn Street, with no other structures being visible from this location.

5.0 TECHNICAL REPORTS ACCOMPANYING THE APPLICATION

This Application is supported by a number of technical reports in relation to the proposed redevelopment of the Concrete Batching Plant. The findings and recommendations of the reports are as follows.

5.1 Landscape Plan

Accompanying this report is a Landscape Masterplan at **Attachment 3**. The Landscape Masterplan includes details of existing and proposed landscaping, photos of existing vegetation on site and on the verges, images of proposed landscaping treatments and a technical assessment of the landscaping. The Landscape Masterplan concludes that:

> *The proposed development has exceeded the required landscaping area within the primary street setback by 30%. The total number of trees provided also exceeds the minimum requirement, contributing positively to the streetscape and urban canopy.*

5.2 Acoustic Assessment and Noise Management Plant

Accompanying this report is an Acoustic Assessment at **Attachment 8**. The Acoustic Assessment details all the acoustic treatments proposed in this Application and recommends the use of noise walls. The Acoustic Assessment concludes in Section 7 by outlining that:

> *The design incorporates acoustic mitigation measures, in the form of acoustic barriers / roofing. These are detailed within the report and on the noise mitigation wall / roof plan in Appendix A.*
>
> *An Operational Noise Management plan will be prepared for the site, incorporating the requirements for day-time vs night-time operations and the normal procedural undertakings such as complaint response processes.*
>
> *The proposed Holcim Welshpool batching plant with noise mitigation walls and roofing incorporated is capable of complying with the requirements of the Environmental Protection (Noise) Regulations 1997 at all times.*

A copy of the Noise Management Plan, which provides greater detail in regard to the noise management, is provided at **Attachment 9**. The Noise Management Plan details designed mitigation including the use of noise walls as well as addressing operating practices and management measures to be implemented. In addition, the Noise Management Plan provides a complaint response protocol.

5.3 Transport Impact Statement and Traffic Management Plan

A Transport Impact Statement (**TIS**) is provided at **Attachment 10**. The Traffic Management Plan (**TMP**) for the Site is provided at **Attachment 11**.

Table 4 below provides a forecast of typical volumes for daily vehicle movements:

Table 4: Typical Volumes For Daily Vehicle Movements

Vehicle Type	Typical Forecast Total Movements Per Day
Light vehicles	114
Agitator trucks	398
Delivery trucks	140
Total	652

As outlined in Section 7.1 of the Transport Impact Statement (TIS):

> *No road safety or road capacity issues associated with the proposed redevelopment of Holcim's site on Briggs Street have been identified. The forecast increase in traffic volumes can readily be absorbed by the surrounding road network and there are no significant traffic safety concerns with the proposal.*
>
> *Access to the site is currently good and the adjacent RAV network accommodates the trucks currently servicing the site. All heavy vehicle traffic will enter and leave the site via Briggs Street. In the near future the intersection of Welshpool Road and Leach Highway is expected to be grade-separated which will reduce congestion there and marginally improve conditions for Holcim traffic.*
>
> *The upgrade of Orrong Road is currently at the planning stage and no funds have yet been allocated for construction. Early concept plans indicate that good connectivity will be retained between the Holcim site and Orrong Road with little or no impact to future traffic.*
>
> *The Town of Victoria Park's parking requirements are met by the proposed 23 bay on site car park. Internal circulation routes have been checked using swept path analysis and no issues found.*

Section 5.1 of the TIS concludes that sufficient on site parking is provided for light vehicles.

Section 5.2 of the TIS states that swept paths of the larger trucks accessing Site have been assessed and are acceptable.

Section 7.2 of the TIS recommends "Based on the traffic assessment herein, DVC supports the development application in terms of its traffic and road safety impact and recommends its approval."

The Traffic Management Plan as provided in **Attachment 11** details routes to be used for an aggregate truck approach and departure and the cement tanker approach and departure. Those routes do not use Cohn Steet or any local residential roads to access the regional road network.

5.4 Surface Water Assessment

Details of water management are provided in the Surface Water Assessment, provided at **Attachment 12**. The Water Management Plan divides the Site into 3 catchments, being: the contaminated catchment; the dirty catchment; and the clean catchment. All of the Site, other than the landscaping will be concrete paved in order to capture and direct the stormwater to the appropriate catchment. Furthermore, in the interest of sustainability and efficiency, as much of the existing concrete pavement will be retained where possible.

The water from the contaminated catchment is directed to the wedge pits where the water is separated and reused where possible. The contaminants from the contaminated water are collected and taken off site and disposed of at an approved facility. The approved facility includes Holcim's Quarry operations in Gosnells whereby the waste material is removed from the wedge pit and then it is crushed and screened and then recycled and used to make road base.

Water from the dirty water catchment is similarly directed to wedge pits where the water is separated and reused where possible. Some of the sediment from the dirty water can be recycled.

Stormwater from the remaining areas or "clean" catchment is directed to an onsite infiltration storage system located underground in the light vehicle car park and therefore stormwater is retained on site to a 10% AEP storm event.

Small quantities of fuels (less than 200 litres) and oils are retained on site for the fixed plant. No maintenance of vehicles is undertaken on site which might result in hydrocarbon leakage. Areas where fuel and oils are kept are appropriately bunded. In the event of any spills, the area will be mopped up with a spill kit and the waste taken off site by a licensed contractor.

As outlined in the Surface Water Assessment Report, water will be collected from all potentially contaminated areas. Potentially contaminated areas include:

- Load bay;
- Slump stands;
- Agitator washout; and
- Wedge Pits.

All potentially contaminated areas will be sealed (concreted) and drained to a collection (chisel/wedge) pit where gross solids will be allowed to settle out. This collection pit will be designed to be cleaned out to ensure that the capacity of the pit is retained.

Section 4 of the Surface Water Assessment Report states that:

> *The runoff generated from contaminated catchments will be directed to the respective wedge pits. The captured runoff will then be pumped into the first flush pit, ensuring that the 1 in 2 AEP, 24-hour storm runoff is diverted for treatment via the first flush pit, holding pit, and stirrer pit. This process effectively manages and treats the contaminated runoff from both the first flush event and the 1 in 2 AEP, 24-hour storm event, meeting the criteria set by DoW (2013) and Holcim (2013).*

As outlined in the Surface Water Assessment Report, stormwater from the clean catchment will be directed to soakwells onsite such that all clean stormwater will be retained on site. Sediment traps will minimise sediment flow into the stormwater system.

Section 5.2.2 of the Surface Water Assessment Report states as follows:

> *The results demonstrate that runoff generated under the proposed development conditions can be effectively managed within the storage system, ensuring a minimum 0.25-metre freeboard and preventing site inundation. This ensures the underground storage system has sufficient capacity to contain and control the 1% AEP flood within the site, in compliance with Policy 203 of the Town of Victoria Park (2023).*

The conclusion at Section 6 of the Surface Water Assessment Report states as follows:

> *GHD has completed a stormwater assessment for the Development Application and Works Approval application of Holcim (Australia) Pty Ltd for the Welshpool Concrete Plant redevelopment, confirming that all stormwaters can be retained, disposed of, and/or recycled on-site in compliance with DWER and Town of Victoria Park requirements.*

5.5 Air Quality Modelling and Air Quality (Dust) Management Plan

In regard to dust, air quality modelling has been undertaken and a copy of that report is provided at **Attachment 13**. The conclusions of that report, as detailed in Section 6 of the report, are as follows:

> *MRP has undertaken an air quality assessment for the redevelopment of the Welshpool concrete batching plant. The emission rates of the redevelopment were estimated using the NPI manual for Emission Estimation Technique Manual for Concrete Batching and Concrete Product Manufacturing and AERMOD was used to predict the TSP, PM10, PM2.5 concentrations and the dust deposition. Background level concentrations from Caversham and South Lake were used to assess cumulative impacts.*
>
> *The TSP, PM10, PM2.5 concentrations in isolation and cumulatively as well as dust deposition concentrations are predicted to remain well below the standard criteria at sensitive receptor locations.*
>
> *Comparative assessment shows that despite an increase in production, due to the implemented controls and relocation of some sources away from sensitive receptors, concentrations of TSP, PM10 and PM2.5 are unlikely to differ from current operations at nearby sensitive receptors. Given the small number of verified complaints that have been received and incidents that have occurred have related to upset conditions rather than normal operations, and that these problems have been quickly identified and rectified, it is unlikely that amenity will be significantly affected due to nuisance impacts from dust.*

Therefore, the proposal is compliant with the relevant requirements and will be well below the standard criteria at the sensitive receptor locations on the opposite side of Cohn Street.

Appendix 1 of the Air Quality Modelling Report also contains an Air Quality (Dust) Management Plan for the site.

5.6 Arboricultural Report

It has been recently observed that the existing verge tree on Briggs Street is in poor condition and is considered to be dead. **Attachment 14** contains an Arboricultural Report. Section 7 of that report contains the recommendation and the report recommends "Removal of the tree and grinding of the stump."

5.7 Lighting Design Report

As the existing and proposed redeveloped Plant are intending to operate 24 hours per day, if it is deemed that lighting is required, a Lighting Design Report and Lighting Plan has been prepared. A copy of the Lighting Design Report and Lighting Plan is provided within the Lighting Design Report and Lighting Plan at **Attachment 15.**

As outlined in Section 10 of the Lighting Design Report "All lighting requirements have been achieved within the parameters of relevant standards and proves satisfactory for all areas. Compliance achieved for all spill light parameters".

5.8 Visual Assessment

A Visual Assessment of the proposed Plant redevelopment has been carried out utilising a methodology based on the Visual Landscape Planning in Western Australia: a manual for evaluation, assessment, siting and design.

A copy of the Visual Assessment Report is provided at **Attachment 16**. The report provides a visual impact assessment from a number of vantage points. The anticipated visual impact and responses to visual management objective is provided below

In relation to the view location of 11 Cohn Street (a residential property immediately opposite the Plant):

> *The development is compatible with the 'Best practice siting and design' Visual Management Objectives (**VMO**) assigned to this view. The siting and design of the proposal includes measures that attempt to integrate it with its surrounding landscape character, including the colouring of the silos and access gate, and the extension of the existing verge landscape approach.*
>
> *Mitigation strategies to further improve the blending of the Plant into the site include the selection of Eucalyptus victrix as the tree species for verge planting, which grows to approximately 8m high and 4m wide, which will increase screening of the silos as the trees establish.*

In relation to the view location of the corner of Cohn Street and Downing Street, being on the border of the industrial and residential zoning change:

> *The development is compatible with the 'Best practice siting and design' VMO assigned to this view. The landscape character, view experience and landscape values identified in the visual landscape evaluation are retained using colours and textures that blend with the existing industrial character of the site, and the siting behind other built form contributes to the segmented line of the horizon.*

In relation to the view location of the corner of Briggs Street and Downing Street, being within the industrial area:

> *The development is compatible with the 'Best practice siting and design' VMO assigned to this view. The siting and design of the proposal includes measures that attempt to integrate it with its surrounding landscape character, including the colour and texture of the visible built form.*
>
> *The visual impact is lessened by the view location being located within the Light Industrial LCU, where the viewer is likely to be travelling by car and moving through the area, not lingering.*
>
> *Mitigation strategies would be difficult to implement in this location given the height of the proposed Plant above other built form, and the corner location being unsuitable for the planting of trees to screen views.*

In relation to the view location of the corner of Cohn Street and Juniper Street, being on the border of the industrial and residential zoning change:

The development is compatible with the 'Best practice siting and design' VMO assigned to this view. The landscape character, view experience and landscape values identified in the visual landscape evaluation are retained using colours and textures that blend with the existing industrial character of the site, and the siting behind other built form contributes to the segmented line of the horizon. Screening of the Plant from an existing tree helps reduce the visual impact of the proposal.

The conclusions of that report are contained in the executive summary and as follows:

> *The visual impact assessment process indicated that the proposed development is 'blending' with the existing landscape character from all viewpoints assessed, although in some locations the line and form of the proposed Plant appear prominent. Overall, the landscape character, view experience and landscape values identified in the visual landscape evaluation are retained.*
>
> *Therefore, the proposed Welshpool Concrete Plant upgrades will meet the Best Practice Siting and Design management objective as the proposal attempts to integrate the development with the existing character. The proposed landscape plan (**Appendix C**) will also mitigate visual impacts by increasing the level of screen planting such as the addition of Eucalypt trees.*

A full set of the perspectives and rendered images of the proposed Plant redevelopment are provided at **Attachment 17**.

5.9 Waste Management

A copy of the Waste Management Plan is provided at **Attachment 18**. The Waste Management Plan adopts a waste minimisation strategy, maximising recycling. Details of the strategies for office waste, water, packaging and concrete waste is provided in the Waste Management Plan. The Waste Management Plan demonstrates that all waste will be recycled or appropriately disposed of.

5.10 Summary

The technical reports demonstrate that the redevelopment of the Plant, with the proposed improvements to the infrastructure and management practices, is capable and warrants approval, the proposed improvements will not have an adverse impact on the adjacent dwellings. In all, the physical and operational changes to the Plant will provide overall benefits and improvements to current operations, notwithstanding the increased throughput involved.

6.0 CONSIDERATION UNDER THE PLANNING FRAMEWORK

6.1 Metropolitan Region Scheme

The Subject Site and land to the east, west and south are all zoned Industry under the Metropolitan Region Scheme (**MRS**).

Refer to **Figure 10** for a plan showing the MRS zoning of the Subject Site and surrounds.

The *Planning and Development Amendment (Metropolitan Region Scheme) Act 2024* (**MRS Act**) became operational on 31 March 2025. The Application has been assessed under the MRS Act.

Pursuant to Clause 22 of the MRS Act, the purpose of the Industrial zone is "to provide for manufacturing industry, the storge and distribution of goods and associated uses."

The proposed continued use of the Site for a Concrete Batching Plant is consistent with the purpose of the Industry zone under the MRS Act.

6.2 State Planning Policy 1: State Planning Framework

State Planning Policy 1 (**SPP1**) is the key strategic framework guiding future planning decisions relating to environment, community, economy, infrastructure, regional development, and governance.

In particular, consistent with s.3 (1) of the *Planning and Development Act 2005* which states as follows:

> *3. Purposes and interpretation of this Act*
>
> *(1) The purposes of this Act are to —*
>
> *(a) consolidate the provisions of the Acts repealed by the Planning and Development (Consequential and Transitional Provisions) Act 2005 (the Metropolitan Region Town Planning Scheme Act 1959, the Town Planning and Development Act 1928 and the Western Australian Planning Commission Act 1985) in a rewritten form; and*
>
> *(b) provide for an efficient and effective land use planning system in the State; and*
>
> *(c) promote the sustainable use and development of land in the State.*

The Proposal is aligned with the sustainable use and development of land within the State.

In relation to 'Economy', SPP1 the following is relevant:

> *Planning should contribute to the economic well-being of the State, regions and local communities by supporting economic development through the provision of land, facilitating decisions and resolving land use conflicts. In particular, planning should provide for economic development by:*
>
> *i) providing suitable zoned and serviced land for industry, business and other employment and wealth generating activities;*

Holcim's Concrete Batching Plant plays a critical role in supporting the State economy, particularly in terms of volume direct to CBD development, Government and other infrastructure projects and volume to residential construction.

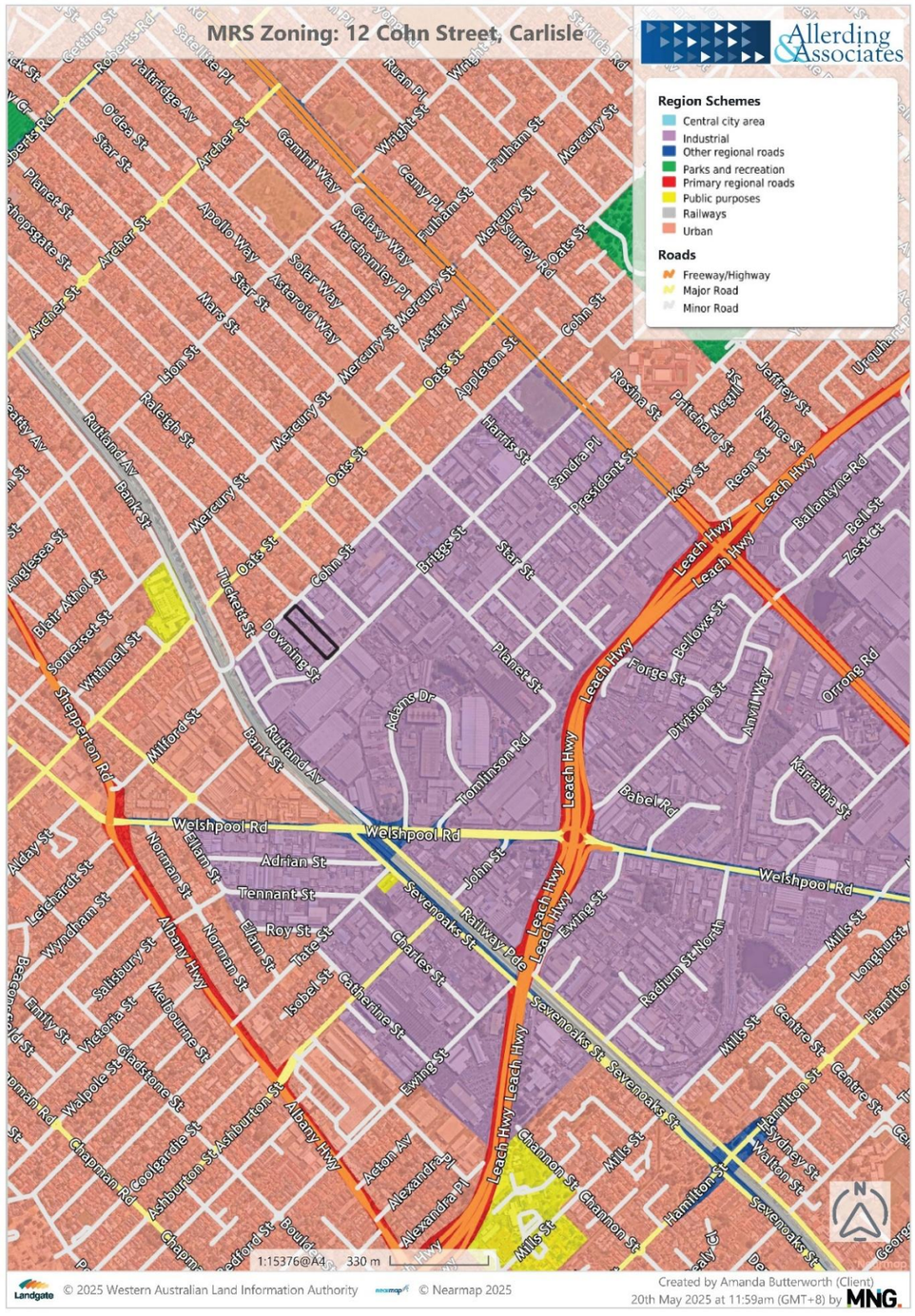


Figure 10: Metropolitan Region Scheme Zoning

The increased demand for concrete supply resulting from current and planned CBD development, highlights the importance of continued concrete batching in close proximity to the CBD. Should concrete production capacity significantly decrease, this will have an immediate effect on the delivery of affordable and sustainable concrete supply.

In relation to Environment, the principle of "Conserve the State's natural assets through sustainable development" has been addressed as follows:

- The air quality modelling and Air Quality Management Plan (**Attachment 13**) ensures that suitable standards of air quality are maintained at all times;
- Water management adopted for this Site includes on site recycling of water. Refer to the Surface Water Assessment that provides details of water recycling strategies adopted on site (**Attachment 12**);
- Concrete waste is separated in wedge pits, where the water is recycled and the concrete waste is taken off site to Holcim's Gosnells Quarry where it is crushed and screened and then recycled for use in products such as road base;
- Holcim have adopted an Environmental Policy that outlines that Holcim is committed to providing positive contributions to the community, the environment and our business by continuously improving environmental performance and focusing on sustainable development. Refer **Attachment 19** for a copy of Holcim's Environment Policy.
- Internationally, Holcim's net-zero pledge incudes Scope 1, 2 and 3 targets.
- The Plant will produce Holcim's Ecopact concrete, which is a sustainable low carbon embodied concrete.
- Solar panels are proposed to be used for the office to supplement power.

The above provides some examples of Holcim's commitments to sustainability.

Not allowing a suitable inner city location for a replacement plant for East Perth together with already constrained supply chains, longer travel distances and increased environmental impacts are inconsistent with the principles under SPP1. The systems proposed to be put in place at the Welshpool Plant are considered to be consistent with the broad principles of sustainable development.

6.3 State Planning Policy 7.0: Design of the Built Environment

Table 5 provides brief responses to the ten (10) design principles of State Planning Policy 7.0: Design of the Built Environment (SPP 7.0).

Table 5: Responses to the Design Principles of SPP7.0: Design of the Built Environment

Design Principle	Comment
1. Context and character *Good design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place.*	The Subject Site has an industrial zoning under the Town of Victoria Park LPS2 and under the MRS. Taking into account the context of the land on the opposite side of Cohn Street being zoned Residential, the Application proposes the retention and improvement of the already highly landscaped interface of the Plant with Cohn Street. It also proposed that no heavy vehicles use Cohn Street, with taller elements of the proposal being located centrally and towards the Briggs Street end of the Site. It is also proposed to retain the solid wall on Cohn Street and increase landscaping along the

Design Principle	Comment
	verge of Cohn Street. Refer to **Figures 8 and 9** which show the existing and proposed treatment on Cohn Street, enhancing the contribution to the sense of place. Furthermore, it is noted that in December 2024, WAPC approved a building of 18 storeys in height, less than 300 metres from the Subject Site. The height of the proposed silos and aggregate storage building is significantly less than that recently approved nearby.
2. Landscape quality *Good design recognises that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context.*	The proposal seeks to retain the existing two trees on site. As detailed in the Arbocultural Report at **Attachment 14**, the verge tree to Briggs Street has died and it is the recommendation of the Arbocultural Report that the deceased tree be removed and replaced. The Site already comprises a highly landscaped interface to Cohn Street, This will be further enhanced with landscaping proposed within the light vehicle parking area and consolidated along the Cohn Street verge. This landscaping provides improved amenity for staff with shaded parking bays and also provides greater canopy cover, with the introduction of drought tolerant and low water usage local plant species which provides local environmental context.
3. Built form and scale *Good design ensures that the massing and height of development is appropriate to its setting and successfully negotiates between existing built form and the intended future character of the local area.*	Due consideration of this principle has been given in the design by locating the taller elements closer to Briggs Street and further from the low density residential housing in Cohn Street. Noting that increased height for residential buildings is anticipated around the core component of the Oats Street station, south of Tuckett Street, as part of the likely future amenity. The visual assessment provided at **Attachment 16** provides further comment in regard to context and concludes that *The visual impact assessment process indicated that the proposed development is 'blending' with the existing landscape character from all viewpoints assessed, although in some locations the line and form of the proposed Plant appear prominent. Overall, the landscape character, view experience and landscape values identified in the visual landscape evaluation are retained.* *Therefore, the proposed Welshpool Concrete Plant upgrades will meet the Best Practice Siting and Design management objective as the proposal attempts to integrate the development with the existing character. The proposed landscape plan will also mitigate visual impacts by increasing the level of screen planting such as the addition of Eucalypt trees.* Accordingly, this design principle is considered to be satisfied.
4. Functionality and build quality *Good design meets the needs of users efficiently and effectively, balancing functional requirements to perform well and deliver optimum benefit over the full life-cycle*	Functionality has been improved with the introduction of a covered system for delivery and movement of the raw materials. Good build quality is achieved through durable materials in the new building elements.
5. Sustainability *Good design optimises the sustainability of the built environment, delivering positive environmental, social and economic outcomes.*	Improved water management utilises water recycling on Site to improving sustainability as well as good waste management practices. Waste concrete material is transported to Holcim's Gosnells Quarry where it is screened and crushed and recycled to be used in the production of road base.
6. Amenity *Good design provides successful places that offer a variety of uses and activities while optimising internal and external amenity for occupants, visitors and neighbours, providing environments that are comfortable, productive and healthy.*	In locating the more intensive operational building elements closer to Briggs Street along with the incorporation of noise walls and new batching facilities within the development, will improve the amenity of the residents on Cohn Street.
7. Legibility *Good design results in buildings and places that are legible, with clear connections and easily identifiable elements to help people find their way around.*	The legibility of the Site is improved in that all light vehicles now use the street abutting the Residential zoned land and all heavy vehicles use Briggs Street, within the industrial area. The introduction of separate entry and exit to Briggs Street and a one way vehicle movement system improves circulation and safety within the Site. The design provides safe walking spaces within the Site for staff and other users walking within the Site.
8. Safety *Good design optimises safety and security, minimising the risk of personal harm and supporting safe behaviour and use.*	The introduction of a one way vehicle movement system and dedicated pedestrian walkways improves safety.
9. Community *Good design responds to local community needs as well as the wider social context, providing environments that support a diverse range of people and facilitate social interaction.*	The landscaping treatment to Cohn Street provides further improved presentation to the street for the benefit of the adjacent residents.
10. Aesthetics *Good design is the product of a skilled, judicious design process that results in attractive and inviting buildings and places that engage the senses.*	The built form of the proposal is designed to place more intensive operational elements and taller structures further from the Residential zoned land in Cohn Street. Images from the Visual Assessment are at **Attachment 17.** It is also notable that the likely future amenity will include taller buildings adjacent to Oats Street Station, south of Tuckett Street. The buildings are not imposing on Cohn Street. It is proposed to incorporate public art into the proposal in the form of artwork on the silos, on the aggregate storage building or on fencing to the street. Holcm have a history of accommodating public art within their project spaces and this will be considered for this proposal.

6.4 Economic and Employment Lands Strategy (EELS)

With the finalisation of the *Economic and Employment Lands Strategy: non-heavy industrial: Perth Metropolitan and Peel regions* (April 2012) (**EELS**), the strategic question of the importance of inner-city Concrete Batching Plants was addressed along with retaining industrial land.

With respect to a recognised shortage in industrial land supply, the EELS expresses that:

> *"the limited supply of available industrial land within the central and inner sub-regions are forcing industrial occupiers to locate at the outer reaches of the Perth metropolitan and Peel regions, which bring numerous challenges."*

Notably, these challenges, which also apply to the case of the Concrete Batching Plants in East Perth, are acknowledged and specifically refers to the importance of inner-city plants in this context:

- *Impacts on supply chain efficiencies with the incurring of higher operational costs due to further distances from suppliers, clients etc. (e.g. travel costs) and impediments on product quality because of additional distance needing to be travelled (i.e. concrete); and*
- *The constant threat from residential encroachment and the subsequent restrictions being imposed on occupiers (**e.g. concrete batching plants in East Perth**)* (emphasis added*). This is particularly true for those industries located within the central sub-region.*

In recognising the pressure of continued population growth and resultant demand for new and upgraded service infrastructure, the strategy outlines the importance of retaining strategically located Concrete Batching Plants.

> *Other industrial uses and activities, particularly in the inner region close to the CBD, are being forced to relocate, as land becomes more and more valuable and sought after for residential and office uses.*

…

Due to these other high end competing uses, such as residential and commercial, the land stock is under extreme pressure and if no intervention is taken to protect the remaining industrial land parcels the land stock will be dramatically reduced. An example of this conflict between competing uses is ***the concrete batching plants located in East Perth****.* (emphasis added)

In regard to Industrial zones in the central sub-region, and the issues resulting from a decline in available industrial land within the inner metropolitan area due to encroachment of higher end competing uses, such as residential and commercial has resulted in: *"the need to protect existing key strategically located industrial facilities* ***i.e. concrete batching plants****"*. (emphasis added)

The Strategy's repeated principle of "protection and preservation" of industrial land use provides a clear direction of the importance of inner-city Batching Plants as a matter of State or regional importance, and reference to the "plants in East Perth" explicitly identifies the significance of the Concrete Batching Plants in the inner city area, noting that this Application seeks approval for an inner city replacement Batching Plant in Carlisle.

6.5 State Infrastructure Strategy – Foundations for a Stronger Tomorrow

Although not a Policy of the WAPC, the State Government has released its *State Infrastructure Strategy - Foundations for a Stronger Tomorrow* (July 2022) (**SIS**). In looking at the Perth CBD, the Strategy advances on the work in EELS and has specifically reaffirmed the importance of concrete supply to development within the CBD and inner metropolitan areas in the following terms (p140), which is consistent with the principles established under SPP1.

Planning and Coordination

Strategic industrial uses, infrastructure and resource inputs

…..

*Long-term land-use planning should also ensure the ongoing productive capability of inner metropolitan industrial land. Some near city industrial areas are experiencing ongoing pressures related to urbanisation and concerns around the potential impacts of truck movements, noise and other environmental factors. With limited remaining industrial zoned land in the inner metropolitan area, it is important that industrial land use provisions remain flexible enough to accommodate assets that are critical for the construction of infrastructure and need to be near the markets they serve. For example, concrete is a significant cost component of infrastructure projects, with proximity to market being critical to both the affordability and quality of the product. Two near-city concrete batching plants are scheduled to close in 2024 due to the expiry of existing planning approvals. The closure of 2 important supply points is a risk to the construction sector in the Perth CBD and inner metropolitan area due to increased transport costs and reductions in useable time of concrete from batching to placement. The WA Government has been working with the affected operators to identify appropriate alternate sites given the complexities of batching plant infrastructure specifications and the broader public interest in maintaining access to affordable supply. It is important that this process is resolved in a timely manner to ensure impacts and disruption are minimised. (Infrastructure WA July 2022) (*Emphasis Added*).*

The above demonstrates the understanding that the Concrete Batching Plants are considered of such State and regional importance but also the importance of ensuring that a replacement inner city Plant for Holcim is available which allows for the seamless continuation of operations from East Perth to Carlisle.

6.6 Perth and Peel @ 3.5 million Central Sub Regional Framework

The Central Sub Regional Planning Framework is part of the Perth and Peel at @ 3.5milion suite of documents.

The Central Sub-Regional Planning Framework aims to establish a long term integrated planning framework for land use and infrastructure, with a focus on guiding future infill growth in the Central Sub Region.

The framework builds upon the principles of Directions 2031 and Beyond and is a key instrument for achieving a more consolidated urban form that will reduce dependence on new urban greenfield developments to accommodate the anticipated population growth, by increasing residential density and urban infill development targets. It provides the strategic spatial framework which will guide local governments in achieving optimal urban consolidation. The framework also sets out to strengthen key employment centres, including activity centres and industrial centres to meet the future needs of industry, commerce and the community.

Figure 11 provides an extract of Central Subregional framework, noting that the subject Site is identified as Industrial in the framework land uses.

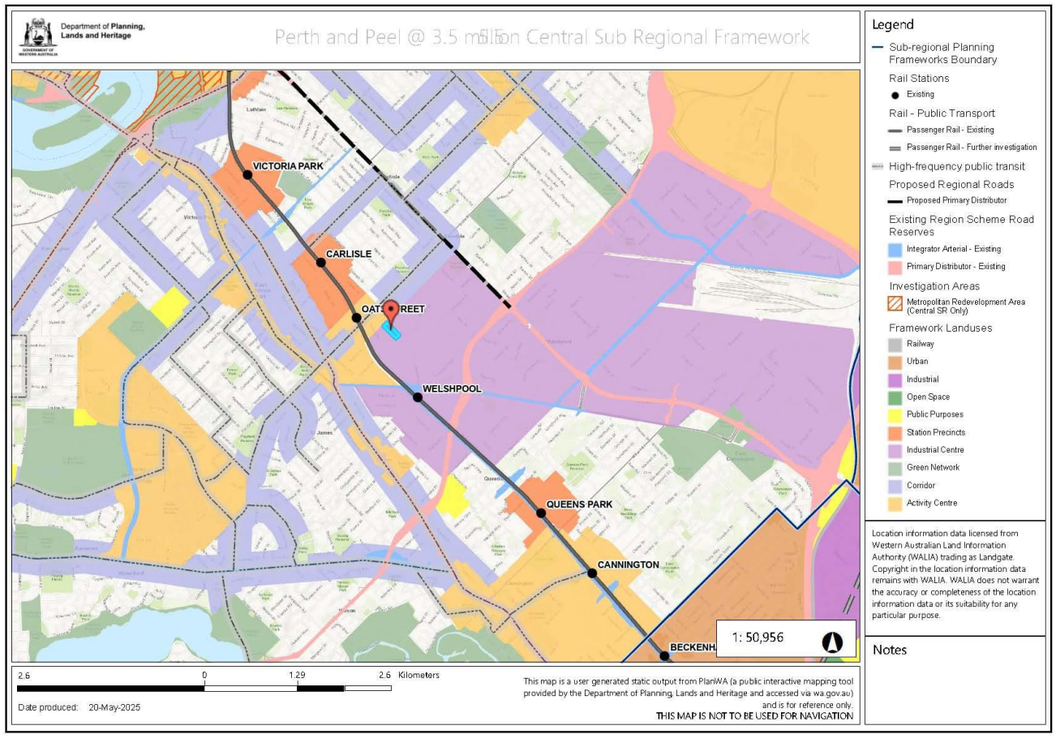


Figure 11: Extract of Central Sub Regional Planning Framework

6.7 State Planning Policy 4.1 Industrial Interface

State Planning Policy 4.1: Industrial Interface (**SPP4.1**) has been considered in assessment of this Application. One of the objectives of SPP4.1 includes to avoid, mitigate or manage potential impacts of an industrial proposal on the health and amenity of people and the environment.

Recognising:

- The Industrial zoning of the Site under the MRS;
- The existing Concrete Batching Plant facility operating on the Site since circa 1959; and

- The recognition of the Site to accommodate a Plant considered to be of State or regional importance.

The proposal has nevertheless given careful regard to its location opposite sensitive premises. When comparing the existing Concrete Batching Plant to the proposed Plant subject of this Application, the Plant has been redesigned to provide substantial equipment and operational improvements including the decision to relocate the more intense elements of the proposal further away from the sensitive premises on the opposite side of Cohn Street and remove all heavy vehicle movements from Cohn Street.

In addition, accompanying this Application is an Acoustic Assessment Report (refer **Attachment 8**), and a Noise Management Plan (**Attachment 9**) which details the mitigation measures that are to be implemented to ensure that operations comply with the *Environmental Protection (Noise) Regulations 1997*. All of the mitigation measures have been incorporated into the design, including the introduction of noise walls, improved practices, such as the introduction of wet mix batching for night time operations and the use of suitable new infrastructure/equipment to reduce noise generated on Site.

In regard to potential dust emissions, an Air Quality Modelling Report accompanies the Application at **Attachment 13**, which includes an Air Quality (Dust) Management Plan at Appendix 1 to that report. The dust mitigation measures recommended in the Air Quality Management Plan will be implemented on Site in order to minimise any potential impacts on the nearby sensitive premises.

Whilst the proposal represents an intensification of land use, as compared to what presently exists, the mitigation measures to be implemented, particularly in regard to noise, dust and traffic flow, potentially results in an improved outcome for the nearby sensitive premises as the new infrastructure is either enclosed, underground or mitigated with acoustic/dust suppression devices along with improved management practices to minimise externalities from the Site.

Therefore, it is considered that approval of the Application would be consistent with the Policy objectives of SPP4.1 which include avoid, mitigate or manage potential off site impacts associated with Industrial land uses in proximity to sensitive land uses.

6.8 EPA: Guidance for Separation Distances between Industrial and Sensitive Land Uses No. 3 (June 2005)

This Guidance Statement identifies that a "*concrete batching plant* " where "concrete is made (batched) and loaded for transport or cement products are made has a buffer of 300m-500m depending on site, noting that the impacts associated with a Concrete Batching Plant are noise and dust.

In regard to the potential impacts of noise and dust for a Concrete Batching Plant, Clause 4.4.1 of the Guidance Statement identifies/states:

> *Where the separation distance is less than the generic distance, a scientific study based on site- and industry-specific information must be presented to demonstrate that a lesser distance will not result in unacceptable impacts.*

Included in this report are scientific technical reports based on on-site and industry specific information which conclude that the separation distances to the nearest residential dwellings area are acceptable, based upon the mitigation measures recommended in those reports.

The findings of these technical studies are summarised in this report, noting that the conclusion of the Acoustic Assessment provided at **Attachment 8** is that:

> *The proposed Holcim Welshpool batching plant with noise mitigation walls and roofing incorporated is capable of complying with the requirements of the Environmental Protection (Noise) Regulations 1997 at all times.*

In regard to dust, air quality monitoring has been undertaken and a copy of that report is provided at **Attachment 13**. The conclusions of that report, as detailed in Section 6 of the report, are as follows:

> *MRP has undertaken an air quality assessment for the redevelopment of the Welshpool concrete batching plant. The emission rates of the redevelopment were estimated using the NPI manual for Emission Estimation Technique Manual for Concrete Batching and Concrete Product Manufacturing and AERMOD was used to predict the TSP, PM10, PM2.5 concentrations and the dust deposition. Background level concentrations from Caversham and South Lake were used to assess cumulative impacts.*
>
> *The TSP, PM10, PM2.5 concentrations in isolation and cumulatively as well as dust deposition concentrations are predicted to remain well below the standard criteria at sensitive receptor locations.*
>
> *Comparative assessment shows that despite an increase in production, due to the implemented controls and relocation of some sources away from sensitive receptors, concentrations of TSP, PM10 and PM2.5 are unlikely to differ from current operations at nearby sensitive receptors. Given the small number of verified complaints that have been received and incidents that have occurred have related to upset conditions rather than normal operations, and that these problems have been quickly identified and rectified, it is unlikely that amenity will be significantly affected due to nuisance impacts from dust.*

Therefore, the proposal complies with the relevant standards and given the existing operations have had very few complaints over the past 13 years since 2012, all of which were as a result of equipment failures and resulted in a short term impact that was addressed, the proposed Plant redevelopment is considered to be acceptable and not result in any undue adverse impact in relation to dust or noise to premises on Cohn Street.

6.9 Visual Landscape Planning

Although not a Policy of the WAPC, in 2007, the WAPC released the Visual Landscape Planning Manual for evaluation, assessment, siting and design. A Visual Assessment of the proposal has been prepared in accordance with this manual. A copy of that report is provided at **Attachment 16**.

The conclusions of that report are as follows:

> *The visual impact assessment process indicated that the proposed development is 'blending' with the existing landscape character from all viewpoints assessed, although in some locations the line and form of the proposed Plant appear prominent. Overall, the landscape character, view experience and landscape values identified in the visual landscape evaluation are retained.*
>
> *Therefore, the proposed Welshpool Concrete Plant upgrades will meet the Best Practice Siting and Design management objective as the proposal attempts to integrate the development with the existing character. The proposed landscape plan (**Appendix C**) will also mitigate visual impacts by increasing the level of screen planting such as the addition of Eucalypt trees.*

6.10 Town of Victoria Park Local Planning Scheme No. 2

The Subject Site is zoned Light Industry, pursuant to the recently gazetted Town of Victoria Park Local Planning Scheme No. 2 (**LPS2**). Refer to **Figure 12** for an extract of the Zoning Plan pursuant to the Town of Victoria Park LPS2.

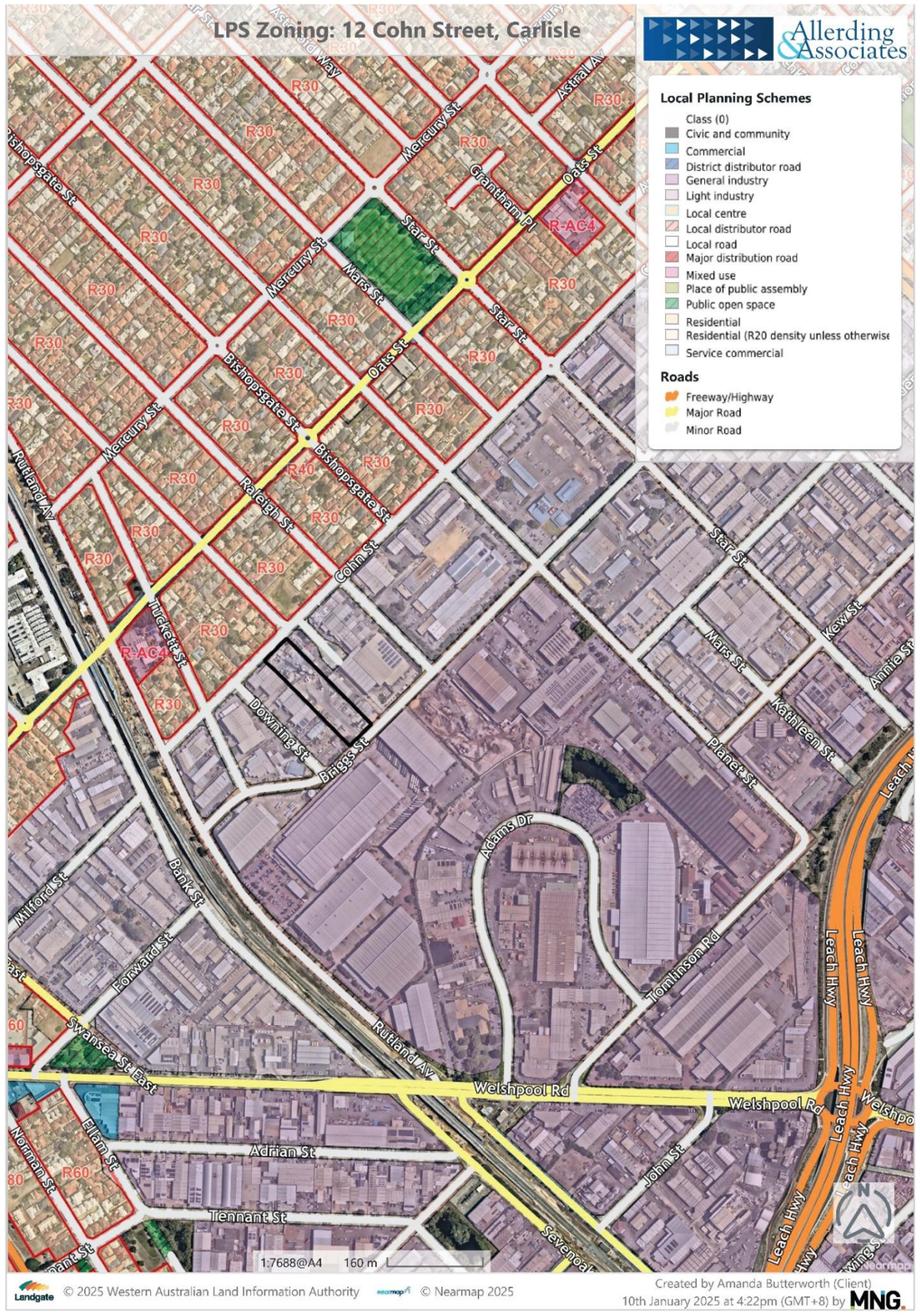


Figure 12: Local Planning Scheme Zoning

Clause 16 of LPS2 provides the objectives of each of the zones. The objectives of the Light Industry zone are as follows:

1. *To provide for a range of industrial uses and service industries generally compatible with urban areas, but not generally appropriate for centres or mixed use areas.*

2. *To ensure that where any development adjoins zoned or developed residential properties, the development is suitably set back, screened or otherwise treated so as not to detract from the residential amenity.*

The Site has operated as a Concrete Batching Plant for over 60 years. The development was designed to minimise potential impacts on nearby residential properties by locating the slump stands and taller elements closer to Briggs Street (further removed from the Residential zoned land), incorporating noise walls into the development, providing screening of the development from Cohn Street, and removing all heavy vehicles from Cohn Street.

The land use is approved on this Site under the previous Development Approvals. It is considered that the proposal satisfies the objectives of the Light Industry zone in that the development has been designed to minimise the potential for adverse impacts the nearby residential zoned properties.

The Concrete Batching Plant use is consistent with an "Industry" land use.

Clause 17 and Table 3: Zoning Table of LPS2 details the permissibility of uses pursuant to LPS2. An "Industry" land use is listed as a "D" use in the Light Industry zone. Clause 18 of LPS2 details that a "D" symbol in the Zoning Table means:

> *that the use is not permitted unless the local government has exercised its discretion by granting development approval.*

Previous development approvals for the Site granted consent for the Concrete Batching Plant under the "Noxious Industry" land use pursuant to the Town of Victoria Park Local Planning Scheme No. 1 at the time as a non conforming use. The change to "Industry" in LPS2, means the use is now a conforming land use, affirming the suitability of the land use consistent with current approvals that have been granted.

Clause 32 of LPS2 refers to Schedule C which sets out requirements relating to development that are additional to those set out in the Scheme and policies. The additional site and development requirements under Schedule C are further detailed below.

Clause 34 (2) details that the local government may approve an Application for Development Approval that does not comply with the additional site and development requirements (as set out in Clause 32 of LPS2). In assessing an Application for a variation to the site and development requirements, Clause 34 (4)states:

> *If the local government is of the opinion that non-compliance with an additional site and development requirement will mean that the development is likely to adversely affect any owners or occupiers in the general locality or in an area adjoining the site of the development the local government must –*
>
> *(a) consult the affected owners or occupiers by following one or more of the provisions for advertising applications for development approval under clause 64(4) of the deemed provisions; and*
>
> *(b) have regard to any expressed views prior to making its determination to grant development approval under this clause.*

Further Clause 34 (5) outlines that in determining an Application under Clause 34 of LPS2, the local government is to have due regard to the matters set out in Clause 67 (2) of the deemed provisions and be satisfied that:

the non-compliance with the additional site and development requirement will not have a significant adverse effect on the occupiers or users of the development, the inhabitants of the locality or the likely future development of the locality.

Schedule C of LPS4 details the additional site and development requirements. **Table 6** details the relevant development standards detailed under AST3 – All land zoned Light Industry and an assessment under those standards.

Table 6: Assessment Under Additional Site And Development Requirements of AST3

Site and Development Standard Description	Standard Applicable	Proposed	Comment
Plot Ratio	Maximum 1.0	< 1.0	Compliant
Building Height	Maximum of 3 storeys or 12 metres	Maximum of 31 metres to the top of the silos (located central to the Site). Maximum of 20.38m to the top of the aggregate storage building (at the Briggs Street end of the property).	Non Compliant
Street setback and Secondary Street setback	Minimum of Nil	To Cohn Street: 15m to the aggregate storage building. To Cohn Street: • Nil to noise wall; • 37m to drivers room building; • >75m to the batching plant building.	Compliant
Side and Rear Setback	Minimum of Nil	East boundary: • Nil to noise wall; • 16m to the batching plant building. West boundary: • Nil to noise wall; • 14m to the batching plant building.	Compliant
Landscaping	1. Where a street setback is provided, a minimum of 25% of the street setback area between the site boundary and the building(s) shall be landscaped. 2. Where parking bays are provided between the site boundary and the buildings, shade trees shall be provided at a rate of one tree per four bays.	In relation to street setback to Briggs Street, a total of 30% landscaping has been provided within the 15 metre primary street setback. As the closest building to Cohn Street (drivers room building is setback 37 metres), a separate calculation has not been undertaken for that setback. A total of 23 parking bays have been provided with a total 6 shade trees in the carpark, in addition to the tree being retained.	Compliant

The proposal does not satisfy the development standards as detailed in Schedule C in relation to building height.

The following justification is provided in relation to the discretion sought relating to building height, with additional comment also provided in regard to landscaping.

6.10.1 Building Height

Attachment 16 provides a visual assessment of the proposal. **Figure 8** provided earlier in this report shows the present view from Cohn Street, noting that the silos are visible over the existing fence and **Figure 9** shows how the proposed development will present to Briggs Street.

Perspectives and renders of the proposal in the site context are provided at **Attachment 17**, together with an assessment under the WAPC Visual guidelines at **Attachment 16**.

Whilst the silos proposed in this Application are taller than the existing silos, the silos are located further from Cohn Street. Refer to **Attachment 17** for current and proposed streetscape perspectives. The comparison of the existing view from Cohn Street to the proposed view illustrate the development, including the new silos would not have a negative visual impact upon the residential amenity of Cohn Street, particularly when compared to the current visual presentation to Cohn Street and taking into account the additional landscaping along Cohn Street proposed in this Application. The structures are narrow in their configuration and will be located more than 75 metres from the front boundary to Cohn Street.

The tallest elements of the proposal, being the new silos and the aggregate storage building will be visible from Briggs Street, which is zoned Light Industry on the western side and General Industry on the eastern side of Briggs Street (in the City of Canning). Refer **Attachment 17** which shows existing and proposed viewing angles from various locations along and near Briggs Street and Seville Close. It is not considered that the building height would have an adverse effect on Briggs Street and the industrial area along and near to Briggs Street and Seville Close. As concluded in the executive summary of the Visual assessment at **Attachment 16**:

> *The visual impact assessment process indicated that the proposed development is 'blending' with the existing landscape character from all viewpoints assessed, although in some locations the line and form of the proposed Plant appear prominent. Overall, the landscape character, view experience and landscape values identified in the visual landscape evaluation are retained.*
>
> *Therefore, the proposed Welshpool Concrete Plant upgrades will meet the Best Practice Siting and Design management objective as the proposal attempts to integrate the development with the existing character. The proposed landscape plan (Appendix C) will also mitigate visual impacts by increasing the level of screen planting such as the addition of Eucalypt trees.*

Contextually, development south of Tuckett Street (specifically 167-169 Bank Street, East Victoria Park) has had residential development approved at 18 storeys (approximately 60 metres in height). This is likely to continue around the core of the station as part of the likely future amenity of the area. Therefore, it is not considered the Batching Plant building and associated silo structures and nor the aggregate storage building will have an adverse impact upon the amenity of the locality.

6.10.2 Landscaping

The landscaping package at **Attachment 3** provides a Landscaping Plan and details of landscaping treatments.

For the purposes of the landscaping calculation in regard to the street setback, Briggs Street has been used to assess this development standard for the following reasons:

- The property has dual frontage;
- The significant setback to the buildings on Cohn Street; and

- The presentation to Briggs Street is more open with landscaping visible from the public realm, whereas the solid 4 metre wall and proposed gate to Cohn Street will result in landscaping in proximity to the Cohn Street frontage not being visible from the public realm.

The use of Briggs Street for the purposes of the assessment of landscaping is considered appropriate in this context and based upon our assessment, the proposal satisfies the development standard of AST3.

6.11 Planning and Development (Local Planning Schemes) Regulations 2015

The *Planning and Development (Local Planning Schemes) Regulations 2015* (**the Regulations**) have introduced a set of deemed provisions within Schedule 2 that automatically form part of LPS1. In particular, Clause 67 of Schedule 2 deals with matters to be considered by Local Government and includes the following key provisions relevant to this Application as detailed in **Table 7**.

Table 7: Clause 67 Matters to be Considered

Matters to be considered	Comment
a) *The aims and provisions of this Scheme and any other local planning scheme operating within the Scheme area;*	One of the aims of the redevelopment of this Site is to ensure that the Site can continue to operate in harmony with its surrounds and seek to minimise the potential impact on the nearby residential neighbours by introducing new measures to reduce noise and dust and to have all heavy vehicles exiting the site via Briggs Street. In addition, approval of the Application is in accordance with objective h) which seeks to facilitate business growth.
b) *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;*	Approval of this development is consistent with proper and orderly planning as it seeks to minimise impact on the neighbours and the environment. There are no known draft scheme amendments or a scheme review that have been taken into account that are seriously entertained. Approval of this Application would be consistent with the requirements of orderly and proper planning. There are no Amendments to the MRS that are relevant to determination of this Application. The Town of Victoria Park Council, at its meeting of 21 March 2025 resolved to initiate Scheme Amendment 1 to LPS2. At the time of writing this report, Amendment 1 is yet to be granted consent to advertise, and therefore is not a seriously entertained proposal. Amendment 1 proposes to increase residential densities surrounding the Oats Street Station. In regard to Amendment 1, residential development already exists on the opposite side of the Cohn Street and aerial photography shows that much of the street blocks has already been comprehensively developed as grouped housing based upon the current R30 coding. Approval of this Application would be consistent with orderly and proper planning as this has been taken into account in the design of the proposed redevelopment of the Plant. The noise and dust reports demonstrate that approval of the proposed development, given the mitigation measures/strategies (as detailed in this report), would be consistent with proper and orderly planning.
c) *Any environmental protection policy approved under the Environmental Protection Act 1986 section 31(d)*	The existing operation is registered as a prescribed premises under the *Environmental Protection Act 1986* and the existing Plant is registered by DWER and a current Works Approval has been issued (W6587/2021/1), however, that relates to a previous design and not the current Application. It is noted that an amended registration and works approval is required for the redevelopment of the Site. Holcim will progress with the required environmental approval separate to this Application, noting that Holcim have met with DWER staff in regard to the Application for an amendment to the current works approval. Holcim will continue to comply with the conditions and requirements of DWER.
d) *Any approved State planning policy;*	Approval of this Application would be consistent with the relevant state planning policies, as addressed further in this report.
e) *Any policy of the Commission*	None known that are relevant to this Application.
f) *Any policy of the State;*	Consideration of this proposal under the State Planning Strategy, Economic and Employment and Land Study (**EELS**) and the State Infrastructure Strategy is provided in this report. It is considered that approval of this proposal would be consistent with these strategies of the State.
g) *Any local planning policy for the Scheme area*	All relevant local planning policies are addressed separately within this report
h) *Any structure plan, activity centre plan or local development plan that relates to the development;*	In March 2025, the Town of Victoria Park Council resolved to endorse the Oats Street Station Precinct Structure Plan and seek approval from WAPC to undertaken concurrent advertising of the Draft Oats Street Station Precinct Structure Plan. The Oats Street Station Precinct Structure Plan and Scheme Amendment 1 do not include the Subject Site, but they include land on the opposite side of Cohn Street and land to the east of the Subject Site At the time of writing this report, the advertising of the Draft Oats Street Station Structure Plan has not commenced and the associated Scheme Amendment 1 (which proposes increased density for the Oats Street Station precinct) has not been granted consent to advertise by WAPC. Given that advertising of the Draft Structure Plan has not commenced and Scheme Amendment 1 has not at this time been granted consent to advertise, further comment has not been provided in this report.
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;*	None applicable as the Scheme was gazetted in December 2024.
j) *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;*	Not applicable.
k) *The built heritage conservation of any place that is of cultural significance*	None applicable.
l) *The effect of the proposal on the cultural heritage significance of the area in which the development is located;*	None applicable.
m) *The compatibility of the development with its setting including 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;*	See detail provided further in this report. The Concrete Batching Plant is approved and has existed on site for 50 years. This Application includes new infrastructure and adopted new practices that reduce the potential for dust and noise emissions and result in no trucks accessing Cohn Street. The height of the proposed silos and aggregate storage building is greater than what exists on Site, but moving those structures further away from Cohn Street results in a development that is compatible and similar in appearance, when viewed from Cohn Street. Refer to **Attachment 16** for the Visual Assessment. Therefore, the proposal is considered to be compatible within its setting, noting that the land is zoned for Industrial land uses.

Matters to be considered	Comment
n) The amenity of the locality including the following — *(i) environmental impacts of the development;* *(ii) the character of the locality;* *(iii) social impacts of the development;*	The redeveloped facilities will reduce the environmental impact by introducing more up to date environmental management systems (such as utilisation of an underground material storage) and a wet mix plant for night operations. A water management system will be put in place to maximise recycling of water on Site. Furthermore, a relocation of the noisier plant further away from the residential properties and the construction of noise walls and use of a wet concrete mix batching operation during night time hours will minimise any noise impact and comply with the *Environmental Protection (Noise) Regulations*. Therefore, the proposal will not adversely affect the amenity of the locality in terms of environmental impact. The Application proposes to continue to operate as a Concrete Batching Plant. In terms of the character of Cohn Street, there will no longer be heavy vehicles accessing Cohn Street. It is proposed to further landscape the verge of Cohn Street. The proposed modification to the Plant is not considered to raise any social impacts. But will allow the important continuation of concrete production for major infrastructure and building development in an affordable and sustainable manner that contributes to positive social outcomes. Accordingly, it is considered that the proposal does not result in any undue adverse impact on the amenity of the locality and in fact improves the amenity especially in relation to noise and dust.
o) 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.	The proposal results in an improved outcome in regard to the environment in that the water management system will have a larger capacity and increased water efficiencies. Refer to the Surface Water Assessment at **Attachment 12**.
p) 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;	Refer to the Landscape Plan provided at **Attachment 3**. Two existing trees, located on Site are being retained. The verge tree on Briggs Street has died (refer to the Arbocultural Report at **Attachment 14**) and this will have to be removed and will be replaced with a tree to the Town's satisfaction. The Landscape Plan also identifies extensive planting on the Briggs Street and Cohn Street verges.
q) 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	The Subject Site is not subject to flooding, tidal inundation, subsidence, landslip, bush fire or other similar risks.
r) The suitability of the land for the development taking into account the possible risk to human health or safety;	The Site is currently approved for use as a Concrete Batching Plant and this proposal seeks to bring the Site to a modern standard and therefore represents an improved outcome in terms of risk and safety.
s) The adequacy of - *i. the proposed means of access and egress from the site; and* *ii. arrangements for the loading, unloading, manoeuvring and parking of vehicles;*	Please refer to the attached Transport impact Statement included at **Attachment 10**. The proposal represents improved safety in terms of access and egress to the Site in that it separates the light vehicles and heavy vehicles and provides new separate access and egress points to Briggs Road only for the heavy vehicles. In regard to the industrial activities, all loading and unloading will occur with access from Briggs Street. The plans included at **Attachment 2** show the manoeuvring movements and turning areas for each separate type of vehicle. The carpark for the light/passenger vehicles provides adequate turning areas within the separate carpark.

Matters to be considered	Comment
	Refer attached Transport Impact Statement at **Attachment 10**, which supports the proposal and the proposed Traffic Management Plan at **Attachment 11** which will be implemented.
t) 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;	The attached Transport Impact Statement included at **Attachment 10** provides existing traffic movements and traffic estimates. The assessment states *No road safety or road capacity issues associated with the proposed redevelopment of Holcim's site on Briggs Street have been identified. The forecast increase in traffic volumes can readily be absorbed by the surrounding road network and there are no significant traffic safety concerns with the proposal.* *Access to the site is currently good and the adjacent RAV network accommodates the trucks currently servicing the site. All heavy vehicle traffic will enter and leave the site via Briggs Street. In the near future the intersection of Welshpool Road and Leach Highway is expected to be grade-separated which will reduce congestion there and marginally improve conditions for Holcim traffic.* *The upgrade of Orrong Road is currently at the planning stage and no funds have yet been allocated for construction. Early concept plans indicate that good connectivity will be retained between the Holcim site and Orrong Road with little or no impact to future traffic.* *The Town of Victoria Park's parking requirements are met by the proposed 23 bay on site car park. Internal circulation routes have been checked using swept path analysis and no issues found.*
u) The availability and adequacy for the development of the following- *i. public transport services;* *ii. public utility services;* *iii. storage management and collection of waste;* *iv. access for pedestrians and cyclists (including end of trip storage, toilet and shower facilities);* *v. access by older people and people with disability;*	The Site is located within an approximately 350 metres radius or a 500 metre walk to the Oats Street bus and rail interchange, for workers of the facility. The Site already has access to all relevant public utility services and will require a new 1MVA power supply transformer. Water management proposes to recycle as much water as possible on site. All other waste will be transported off site and disposed of at an approved facility. The new toilet block provides toilet and shower facilities for use by staff. Given the nature of the uses on Site it is not envisaged that universal access would be required for the industrial side of the proposal. A universal access toilet facility is proposed. A dedicated universal access parking bay has not been provided.
v) The potential loss of any community service or benefit resulting from the development other than potential loss that may result from economic competition between new and existing businesses;	The proposal does not result in any loss of community benefit. The provision of an affordable and sustainable supply of concrete for major infrastructure and building works provides community benefits. With this Site being the replacement plant to East Perth, the redevelopment of this Site will allow for a seamless transition to this Site to continue to provide for the community benefit of an affordable and sustainable supply of concrete.
w) The history of the site where the development is to be located	The Site is presently approved for use as a Concrete Batching Plant since 1959.
x) The impact of the development on the community as a whole notwithstanding the impact of the development on particular individuals;	The impact on the community as a whole is that the redevelopment of the Site will provide for job opportunities for construction staff, which is an important consideration. The provision of an affordable and sustainable supply of concrete for major infrastructure and building works provides community benefit. With this Site being the replacement plant to East Perth, the redevelopment of this Site will

Matters to be considered	Comment
	allow for a seamless transition to this Site to continue to provide for the community benefit of an affordable and sustainable supply of concrete.
y) Any submissions received on the application;	It is noted that comments provided in submissions are to be given regard in determining this Application.
za) The comments or submissions received from any authority consulted under clause 66;	It is noted that comments provided in submissions from any authority are to be given regard in determining this Application.
zb) Any other planning consideration the local government considers appropriate;	Redevelopment of this Site will assist to stimulate the economy in the creation of employment opportunities for the construction phase which is a desirable outcome in terms of the economic impact of post COVID-19 pandemic. Furthermore, with the required closure of the Holcim Plant in East Perth by 2027, redevelopment of this Site will continue to enable the ongoing supply of concrete to building and infrastructure projects within the Perth CBD and inner city suburbs. There are many stimulus projects announced by the State government that will require a supply of concrete particularly which can meet an appropriate high specification standard. This new facility will ensure that the supply of concrete to a suitable standard can be supplied for such projects where Holcim is the appointed supplier.

6.12 Town of Victoria Park Local Planning Policy No. 14: Industrial Uses in Proximity to Residential Areas

Local Planning Policy No. 14: Non- Residential Uses in or Adjacent to Residential Areas (**LPP14**), which was amended by Council on 11 December 2018 is a relevant consideration. **Table 8** provides comment in relation to each policy provision:

Table 8: Assessment under LPP14

Policy Provision	Comment
i. Compliance with the recommended buffer distance is Publication No. AQ/86 of the Environmental Protection Authority (revised July 1990 entitled 'Recommended Buffer Distances for Industrial Residual Air Emissions').	This Application is considered to meet the guidance statement through the introduction of measures to minimise the potential for residual air emissions. This includes: • Enclosure of each of the loading bays on three (3) sides while loading; • Underground material storage; • Removal of heavy traffic from Cohn Street; • Introduction of a wet mix plant for night operations; • Relocation of the slump stands to the eastern (industrial) side of the Site and locating the slump stands within an area with walls on three (3) sides and a roof; • Introduction of noise walls of a minimum height of four (4) metres within the Site and along the front boundary to Cohn Street as well as along both side boundaries of the Site (in addition to one section of noise wall being seven (7) metres along one of the side boundaries); • Introduction of a noise wall eight (8) metres in height to the west of the Batching Plant building; and • New contemporary plant and equipment. We refer to the Air Quality Modelling Report contained at **Attachment 13** which concludes that: *Comparative assessment shows that despite an increase in production, due to the implemented controls and relocation of some sources away from sensitive receptors, concentrations of TSP, PM10 and PM2.5 are unlikely to differ from current operations at nearby sensitive receptors. Given the small number of verified complaints that have been received and incidents that have occurred have related to upset conditions rather than normal operations and that these problems have been quickly identified and rectified, it is unlikely that amenity will be significantly affected due to nuisance impacts from dust..*
ii. The scale and nature of the proposed use, including the potential impact of proposed hours of operation.	The Site already has approval for night time operations, subject to compliance with the *Environmental Protection (Noise) Regulations 1997*. The proposal has been modelled and due to the relocation of the noisier activities to be further from Cohn Street and due to the introduction of noise walls and other measures, the proposal will comply with the *Environmental Protection (Noise) Regulations 1997*. A Noise Management Plan is also provided at **Attachment 9**. The redesign enables the new silo structure (Batching Plant building) to be located closer to Briggs Street and the loading bays positioned behind a noise wall, results in improvements to the amenity. Further, with the removal of all heavy vehicles accessing and egressing the Site via Briggs Street and increased landscaping on the verge of Cohn Street, the visual and amenity impact of the new Plant to Cohn Street is minimised. Refer to the Visual Assessment provided at **Attachment 16**, which at the executive summary outlines that: *Therefore, the proposed Welshpool Concrete Plant upgrades will meet the Best Practice Siting and Design management objective as the proposal attempts to integrate the development with the existing character. The proposed landscape plan will also mitigate visual impacts by increasing the level of screen planting such as the addition of Eucalypt trees.*
iii. The impact of vehicle/truck movements associated with the activity through surrounding area.	Presently, empty delivery trucks exit the Site via Cohn Street (Residential zoned land on the opposite side of Cohn Street). As outlined in this report, as part of the redesign of the Site, all truck movements will now be via Briggs Street, therefore removing the impact of heavy vehicles entirely from Cohn Street. Refer to the accompanying Transport Impact Statement (**Attachment 10**), which supports the proposal and the Traffic Management Plan (**Attachment 11**) which delineates truck routes.
iv. Provision for parking of cars, including: • The parking of vehicles being repaired outside buildings on the site; and • Separation of off-loading facilities from visitor and staff parking;	This Application proposes to separate the passenger vehicles from the trucks with all staff parking accessing the site via Cohn Street and all trucks accessing the Site from Briggs Street. As outlined in the Transport Impact Statement at **Attachment 10**, The Town of Victoria Park's parking requirements are met by the proposed 23 bay on site car park."
v. The impact of lighting on external areas of surrounding properties.	**Attachment 15** contains a Lighting Design Report including a Lighting Plan of the proposal. The conclusion of the Lighting Design Report is as follows: "All lighting requirements have been achieved within the parameters of relevant standards and proven satisfactory for all areas. Compliance achieved for all spill light parameters."
vi. Proposed potential for creating waste and proposed methods of waste disposal; and existing and proposed landscaping, aesthetic appearance of buildings and development from the street, including proposed signage.	Where possible, water from on site operations is recycled for use in concrete. It is proposed to use standard green and yellow waste bins as provided by the Town for disposal of general waste. Cardboard packaging is placed in a skip bin on Site and is disposed of by a private contractor. Refer **Attachment 18** for the Waste Management Plan.

Policy Provision	Comment
	All industrial waste, such as the collection of sediment, will be taken off site and disposed of at an approved facility. Existing landscaping on the property will be retained and supplemented by proposed additional planting as detailed in the Landscape Plan (**Attachment 3**).
vii. In determining such Applications, the Council should: • Refuse any application which involves spray painting within a minimum distance from residential areas as specified by the Department of Environmental Protection Standards; and • Impose conditions on any planning approval limiting the movement of delivery vehicles and activities outside buildings to within the hours of 7.00am to 7.00pm Mondays to Fridays and 8.00am to 12 noon Saturdays, ensuring that lighting of any external areas does not adversely affect the amenity of adjoining properties.	The subject Application does not propose any spray painting. Noting the size of the Site, approval is sought under the same terms for hours of operation that currently exist. The Subject Site is the only Industrial zoned lot that extends from Cohn Street through to Briggs Street, which provides comparative advantages. As part of this Application, the Plant has been redesigned such that the noisier activities are to be located on the south eastern side of the lot, being further removed from the Residential zoned properties. The proposal also incorporates noise walls and lighting that is designed to comply with all relevant Australian Standards. The Acoustic Assessment (**Attachment 8**) confirms that the development, including night time operations (24 hour) is capable of compliance with the *Environmental Protection (Noise) Regulations 1997*. A Noise Management Plan is also provided at **Attachment 9**. The supply of concrete to some projects, including government infrastructure projects or major projects, can require delivery of concrete outside standard hours, especially where the work has to be undertaken at times to minimise disruption to vehicular traffic flows on major roads and to minimise traffic disruptions in the City for large pours for buildings requiring high specification concrete . Because there is a need to supply concrete outside standard hours, this proposal seeks to continue approval for 24 hour operations when required to meet the need to supply high specification concrete to the Perth CBD and for infrastructure projects. As outlined in the Acoustic Assessment (**Attachment 8**) and Lighting Design Report (**Attachment 15**), all operations outside standard hours will comply with the relevant noise legislation and lighting standards.

6.13 Town of Victoria Park Local Planning Policy No. 3: Non- Residential Uses in or Adjacent to Residential Areas

Local Planning Policy No. 3: Non- Residential Uses in or Adjacent to Residential Areas (LPP3) has been considered for this proposal. A summary of the policy requirements and a response to each policy provision is provided in **Table 9**.

Table 9: Assessment under LPP3

Policy Requirement	Comment
1. Preferred location .	This Application proposes to modify access to have all heavy (commercial) vehicle access to Briggs Street, which is a street that has Industrial zoning on both sides of Briggs Street.
2. Traffic generation.	A Transport Impact Statement prepared by Donald Veal Consultants accompanies this Application (**Attachment 10**). The only vehicles accessing Cohn Street (which has residential uses on one side) are passenger vehicles. The findings of the Transport Impact Statement include that "No road safety or road capacity issues associated with the proposed redevelopment of Holcim's site on Briggs Street have been identified. The forecast increase in traffic volumes can readily be absorbed by the surrounding road network and there are no significant traffic safety concerns with the proposal".
3. Control of Noise, Pollution or Other Impacts Associated with the Use.	The use presently exists and the Application seeks to bring the development on Site up to a modern standard with improvements to operations. Accompanying the report are the following reports: • Acoustic Assessment (**Attachment 8**) and a Noise Management Plan (**Attachment 9**); • Air Quality Modelling Report and Air Quality (Dust) Management Plan (**Attachment 13**); and • Lighting Design Report and Lighting Plan (**Attachment 15**). Summaries of the abovementioned reports are provided in this report. It is considered that this proposal, with the inclusion of noise walls and other measures and implementation of the management plans ensures that the ongoing operations of the Concrete Batching Plant will not cause undue conflict with or adversely affect the amenity of the neighbourhood through the emission of light, noise, fumes, dust vibration and wastewater. The relocation of heavy vehicles traffic from a residential street to an industrial area is also considered to provide significant improvements on potential noise impacts.
4. Plot ratio.	The plot ratio of the proposed development does not exceed 0.5.
5. Building setbacks.	The proposal meets the required residential setback to Cohn Street.
6. Visual Privacy.	The 4 metre high existing front wall to Cohn Street will be retained. There are no windows proposed that face to surrounding residential properties that could create any visual privacy concerns.
7. Building design.	Refer to **Attachment 16** for the Visual Assessment which provides viewing angles of the development from Cohn Street and provides a visual assessment. As illustrated by the images, the Cohn Street streetscape will not be adversely impacted as a result of the development, as the development will be partially screened by the existing 4 metre high noise wall and the streetscape softened by the proposed landscaping on the verge. As outlined in the Executive Summary of the Visual Assessment "Therefore, the proposed Welshpool Concrete Plant upgrades will meet the Best Practice Siting and Design management objective as the proposal attempts to integrate the development with the existing character. The proposed landscape plan will also mitigate visual impacts by increasing the level of screen planting such as the addition of Eucalypt trees."
8. Location of Vehicular Access/Car Parking and Provision of Boundary Fencing.	Light vehicle access will be via Cohn Street and all trucks will access the Site from Briggs Street. The existing noise wall along Cohn Street will be retained. Existing walls on the boundary to the adjacent industrial lots will be retained and new 4 metre high noise walls, as shown on the Development Plans (**Attachment 2**).
9. Location of Building Services and Bin Storage Areas	Deliver, loading and building services will not be visible from the street or adjoining properties. An upgraded transformer (power) box is to be provided within the property boundaries adjacent to Cohn Street (behind the existing approved front fence). The proposal will utilise the Town's standard yellow and green lid bins for general waste. A skip bin is stored in proximity to the batch office, which is used for cardboard packaging and is taken off site by a private contractor. Refer to the Waste Management Plan at **Attachment 18**. All other industrial waste (such as sediment that cannot be recycled) will be collected and transported off site and disposed of at an approved facility.

Policy Requirement	Comment
10. Antisocial Behaviour and Crime Prevention.	Planning approval was granted for the existing front fence to Cohn Street in 2011. The fence is screened with landscaping in order to provide an improved interface with the residential area. There is no passive surveillance of the street, however, the residential properties on the opposite side of Cohn Street provide passive surveillance and the wall treatment is a preferred attenuation measure on an interface that would result in other externalities such as noise arising.
11. Landscaping.	The Site currently has a front wall along Cohn Street that is 4 metres in height. It is proposed to provide semi additional landscaping to both Cohn Street and Briggs Street verges. Refer Landscaping Concept Plan contained at **Attachment 3**. Two street trees on the Cohn Street verge are proposed to be removed and replaced. The existing verge tree on Briggs Street has been identified as being deceased (refer **Attachment 14** for the Arboricultural Report), so it is proposed to remove the deceased tree in the Briggs Street verge and for this to be replaced with plants as shown in the Landscape Plan (**Attachment 3**). The vegetation that currently exists on Site will be removed, with the exception of the existing mature trees inside the western side property of the property with one tree to be retained at the Briggs Street end and the other existing mature tree to be retained at the Cohn Street end of the Subject Site.
12. Signage.	A signage strategy will be provided prior to the issue of a building permit. A condition of planning approval requiring the submission of a signage strategy would be acceptable.
13. Hours of operation.	This Application allows the continued use of the facility for 24 hours per day, seven days a week, where required and in accordance with the Noise Management Plan.

6.14 Town of Victoria Park Local Planning Policy No. 23: Bicycle Parking, Car Parking and Access for Non Residential Development Policy

The Town of Victoria Park Local Planning Policy No. 23: Bicycle Parking, Car Parking and Access for Non Residential Development Policy (Parking LPP) is relevant to this Application. The policy provides an 'Open Option' approach, minimum on-site carparking mandates are not applicable.

A total of 23 parking bays have been provided on the basis that it is Holcim's aim to ensure that adequate parking is provided on Site to accommodate the needs of the staff to minimise the potential for overflow parking on the verge of Cohn Street. The number of car parking bays is supported in the Transport Impact Statement provided at **Attachment 10**, noting that the Transport Impact Statement has been prepared independently by Donald Veal Consultants.

6.15 Town of Victoria Park Local Planning Policy 29: Public Art Private Developer Contribution

This policy applies to development with an estimated development cost in excess of $2 million. The development cost of this Application is $15 million, therefore this policy is a relevant consideration.

For the purposes of assessment of this proposal pursuant to this policy, it is proposed to provide on site public art, which may be in the form of public art on the silo structures, artwork on the exterior face of the aggregate store building (facing Briggs Street) or could be on the external surface of the wall or gate facing Cohn Street and/or wall on Briggs Street. Holcim have a history of undertaking public art on its projects.

Upon approval of this Application, Holcim will engage with local artists to develop a concept in consultation with the Town, to ultimately present the public art proposal to the Town for their approval, prior to installation.

6.16 Town of Victoria Park Local Planning Policy No. 39: Tree Planting and Retention

The Town of Victoria Park Local Planning Policy No. 39: Tree Planting and Retention (**Tree LPP**) is a relevant consideration in regard to this Application. A Landscape Plan is provided at **Attachment 3** which details the proposed landscaping treatments across the Subject Site and the verge.

In regard to verge trees, the Application proposes:

1. The removal of the verge tree on Briggs Street. It is the opinion of an independent arborist that the verge tree on Briggs Street is deceased. Refer **Figure 13** showing the deceased tree. Refer to **Attachment 14** for the Arboricultural Report regarding the tree and **Attachment 3** for the Landscape Plan showing replacement planting;

2. The removal of the *Corymbia ficifolia* verge tree on Cohn Street due to it being in poor condition noting that this is proposed to be replaced with a new species as detailed in the Landscape Plan in **Attachment 3**. Refer **Figure 14** showing the Cohn Street verge tree in poor condition; and

3. The removal of a *Eucalyptus gomphocephala* verge tree on Cohn Street that this is proposed to be replaced with a new species as detailed in the Landscape Plan in **Attachment 3**. Refer **Figure 14** showing the tree.

The Application proposed to retain two of the existing trees on Site both being a mature *Corymbia* sp. located in proximity to the western side boundary at the Briggs Street end of the Site and the Cohn Street end of the Subject Site. Refer **Figure 15**. One tree on Site being a *Corymbia maculata*, is proposed to be removed given its central location within the Site being in the footprint of the proposed aggregate storage building.

The extensive landscaping proposed as detailed on Pages 7, 8 and 14 of the Landscape Plan at **Attachment 3**, in summary includes:

- On site: two (2) on site trees are to be retained, in addition to the six (6) new trees proposed in the carpark (1 per 4 car bays), and 4 large trees and 8 medium trees provided within the on site landscape area at the Briggs Steet end of the Site (total of 18 new trees plus 2 existing trees on site); and

- Verge planting: Fourteen (14) proposed new trees being 6 large trees and 8 medium trees.

This represents a total of 32 new trees (16 large trees and 16 medium trees) across the Site and verge. It is considered that the landscaping proposed satisfies the objectives of the Tree LPP in that the Landscape Plan proposes a diverse range of tree sizes and species, which together with the existing landscaping will enhance visual interest, assist with providing a more resilient urban forest and assist to achieve the Town's object of increasing the tree canopy coverage.

Figure 13: Deceased Briggs Street verge tree

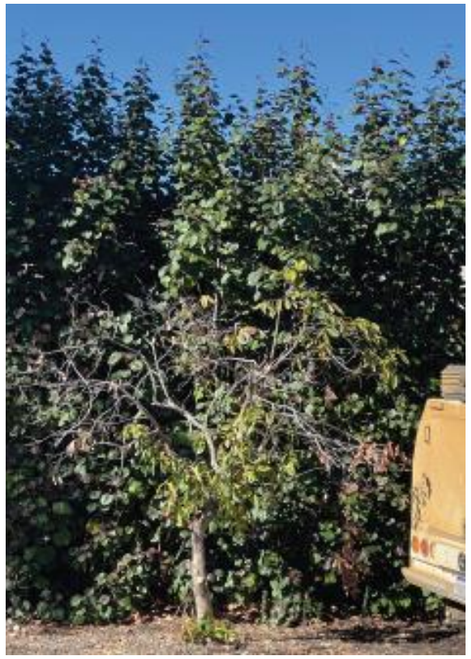


Figure 14: Cohn Street verge trees: Corymbia ficifolia in poor condition to be removed and replaced and one of the verge trees that is a Eucalyptus gomphocephala as shown in Figure 14 to be removed and replaced

Figure 15: Onsite trees to be retained in proximity to Briggs Street and Cohn Street, respectively:

6.17 Town of Victoria Park Crossover Policy

This Application proposes modification to the crossovers on both Cohn Street and Briggs Street.

It is proposed to remove the existing crossover to Cohn Street and reinstate vegetation in accordance with the Landscape Plan. A new 6 metre wide crossover to Cohn Street is proposed to be constructed, providing access to the new passenger (light) vehicle carpark.

It is proposed to modify the existing crossover on Briggs Street to widen it and make it a dedicated entry only for heavy vehicles. The crossover will be widened to 9.5 metres, to provide adequate swept paths for the delivery trucks (refer Appendix A of the Transport Impact Statement at **Attachment 10**). The adjacent property to the west being 16 Downing Street, Carlisle does not have any crossovers to Briggs Street and all vehicle access is via Downing Street. Therefore, the proposed modification to the Briggs Street crossover to the Subject Site will not impact upon access to the adjacent lot.

A new crossover is proposed on the eastern side of the Briggs Street frontage. The crossover is proposed to be 8.5 metres in width and will be an exit only for heavy vehicles. The crossover will be 8.5 metres in width, to provide adequate swept paths for the delivery trucks (refer Appendix of the Transport Impact Statement at **Attachment 10**). The crossover is located at a sufficient distance from the eastern side boundary to ensure that the splay to the crossover does not extend into the verge of the adjacent property.

7.0 CONSIDERATION OF THE APPLICATION UNDER PART 11B OF THE PLANNING AND DEVELOPMENT ACT 2005

7.1 Response to Pre-lodgement Advice

A pre lodgement meeting for this Application was held on 29 January 2025. A copy of the advice was received is included at **Attachment 20**. **Table 10** provides responses to the matters discussed in the Pre Lodgement Meeting.

Table: 10: Responses to Matters Discussed in the Pre-lodgement Meeting

Matters Discussed in the Pre-lodgement Meeting	Comment
The background to the Site and that the JDAP approval to increase current production capacity from 110,000 m^3 to 200,000m^3 and this proposal to further increase the production to 300,000m^3;	As the development is different to that approved by JDAP, approval is sought for this current Application. However, improvements to the existing Plant as proposed in this Application, include: • Enclosure of each of the load bays on three (3) sides while loading; • Underground material storage; • Removal of heavy traffic from Cohn Street; • Introduction of a wet mix plant for night operations; • Relocation of the slump stands to the eastern (industrial) side of the Site and locating the slump stands within an area with walls on three (3) sides and a roof; • Introduction of noise walls of a minimum height of four (4) metres within the Site and along the front boundary to Cohn Street as well as along both side boundaries of the Site (in addition a seven (7) metre noise wall along one side boundary) • Introduction of a noise wall eight (8) metres in height to the west of the Batching Plant building; and • New contemporary plant and equipment. These further modifications mitigate the potential affect from the facility.
Land use considerations under the Town of Victoria Park Local Planning Scheme No.2;	The proposal is reasonably considered to be an "Industry" land use, which is a Discretionary land use in the applicable zone.
Impact of expansion of the facility on the locality, particularly the residential zoned land across Cohn Street, which is designated to be up coded from R30 to R60 in the draft Oats Street Precinct Structure Plan;	It is noted that the Town of Victoria Park has forwarded Scheme Amendment No. 1 to the WAPC for consent to advertise. Scheme Amendment No. 1 relates to the Oats Street Station Precinct Structure Plan and proposes to rezone the land on the opposite side of Cohn Street from Residential R30 to Residential R60. We have been liaising with the Department of Planning, Land and Heritage in regard to Scheme Amendment No. 1 and it is appropriate for WAPC to consider the interface between the residential and industrial land as part of deliberations and the need for urban development to properly consider its interface with existing Industrial zoned land. The proposal has been designed to satisfy the requirements of the relevant legislation in regard to noise, dust, traffic and light in regard to existing and future residential development on Cohn Street.
Amenity (noise, dust, light, vibration and visual) impacts from the plant's 24-hour operations; the requirement for an acoustic assessment, air quality assessment and relevant management plans to support a proposal; impacts to the road network with Cohn Street to be used for staff access only and Briggs Street for all other access, and the requirement for a Transport Impact Assessment to support a proposal;	The report includes the following technical reports: 1. Acoustic Assessment (**Attachment 8**); 2. Noise Management Plan (**Attachment 9**); 3. Transport Impact Statement (**Attachment 10**); 4. Traffic Management Plan (**Attachment 11**); and

Matters Discussed in the Pre-lodgement Meeting	Comment
	5. Air Quality Assessment that incudes dust management measures to be adopted (**Attachment 13**).
The imminent deadline of 1 July 2025, by when Holcim must lodge a development application for an alternative site and reduce the operating hours of the East Perth Plant; and	This Application has been lodged within the required time frame of no later than 30 June 2025.
The requirement to lodge a comprehensive application package containing all technical studies	This Application includes all technical studies as detailed above and is incorporated into a comprehensive application package.
In accordance with Regulation 6 of the Planning and Development (Significant Development) Regulations 2024, the Chair confirmed, following earlier discussion with the Government Architect, the proposed development does not require design review. Any application should give due regard to the visual amenity impacts of the proposal.	Noting that a design review is not required, **Attachment 16** provides a Visual Assessment and includes visual montages showing the existing and proposed development from various viewing angles. The images highlight that the development will not have an adverse visual amenity impact. With the introduction of improved landscaping along Cohn Street, the location of the silos and the Batching Plant building being more central to the Site, the proposal will have a positive impact upon Cohn Street.
The SRCU noted the requirement for a works approval from DWER under the Environmental Protection Act 1986 and the Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998 and the requirement to operate in accordance with the assigned noise levels prescribed by the *Environmental Protection (Noise) Regulations 1997*. The SRCU recommended referrals be sought from the following agencies at the development application stage, unless otherwise requested by the proponent: DWER; Water Corporation; Western Power; and Public Transport Authority	Preliminary discussions have commenced with DWER in regard to the amended works approval. The requirement to comply with the Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998 is noted and accepted and the Plant has been designed to comply with the relevant legislation. The Acoustic Assessment (**Attachment 8**) outlines that with the introduction of the noise walls, the wet mix batching at night and implementation of the Noise Management Plan, the proposal can operate in accordance with the assigned noise levels prescribed by the *Environmental Protection (Noise) Regulations 1997*.
To obtain Premier's Authorisation prior to lodgement of a Part 11B application, given it may not meet the value threshold for entry into the pathway	The Premier's authorisation has been received. Refer **Attachment 1.**
To respond to pre-lodgement advice within application documentation	This table provides a summary of the responses to the pre-lodgement advice.

7.2 Response to Section 171R of the Planning and Development Act 2005

The following responses are provided in regard to the matters raised in Section 171R of the *Planning and Development Act 2005*.

7.2.1 Raise any Issues of State or Regional Importance

In June 2023, the WAPC determined the Application for continued operations of the Holcim East Perth Batching Plant at 120 Claisebrook Road, Perth (**East Perth Plant**). The East Perth Plant is the Plant that supplies the majority of Holcim's high specification concrete to major developments in the Perth Central Business District, as well as supplying high specification concrete for major infrastructure projects. The approval issued by WAPC for the East Perth Plant was time limited and required that Concrete Batching Plant operations cease at the East Perth Plant on or before 31 December 2027. The conditions of approval for the continued operations for the East Perth Plant also required lodgement of a Development Application for a replacement plant and such Application to be lodged no later than 30 June 2025.

This Application seeks approval for redevelopment of Holcim's existing Welshpool Plant, located in Carlisle. The redeveloped Welshpool Plant will ensure an ongoing and uninterrupted supply of high specification concrete for the Perth CBD and infrastructure projects.

The supply of concrete from an inner Metropolitan Concrete Batching Plant is a critical component to delivering the infrastructure, commercial, housing and other projects in the Perth CBD and inner metropolitan area. Accordingly, Holcim is seeking a determination under Part 11B of the Act as this Application raises issues of State or regional importance, particularly as the transition from East Perth to Carlisle will ensure a continued supply of high specification concrete for infrastructure and major development in the Perth CBD.

A request was put to Hon. Minister for Planning pursuant to Part 11B, s171M of the *Planning and Development Act 2005* seeking the Hon. Minister's agreement, pursuant to s171M (2) of the Act, to consider that the Application raises issues of State or regional importance and that it would be appropriate for the Application to be determined under s171 of the Act. We further requested that the Hon. Minister to make recommendation to the Hon. Premier, and for the Hon. Premier, pursuant to s171M (3) of the Act, to refer the Application to the WAPC for determination.

Table 11 provides a summary of the reasons why the Application raises issues of State or regional significance.

Table 11 Matters to be considered in determining whether an application raises issues of State or regional significance

Factors for Consideration for State or Regional Importance	Comment
The nature, scale and/or geographical area of influence.	The Welshpool Plant is located less than a 10 kilometres by road (or a 6.5km radius) to the Perth CBD, thus making this a site that would be suitable to supply high specification concrete to the CBD with the closure of Plants at East Perth by the end of 2027, the Welshpool Plant will be the closest Batching Plant to the CBD in the Perth Metropolitan Region.
Projects that facilitate the delivery of major new housing in Western Australia, in particular community and/or affordable housing opportunities.	The supply of concrete is important in the delivery of major new housing development in WA. The redevelopment of the Welshpool Plant will ensure an ongoing supply of high specification concrete, particularly for multi storey, mixed use and residential developments in the Perth CBD and inner city regions, along with associated infrastructure that supports them.
The potential contribution to delivery of physical, community or other infrastructure and/or building sustainable communities.	The redevelopment of the Welshpool Plant will ensure a seamless transition to enable ongoing supply for major infrastructure projects, including but not limited to, METRONET projects.
The potential contribution to the economic well-being of the State or region such as by facilitating local employment opportunities.	The redevelopment of the Welshpool Plant will create employment opportunities, including employment during construction and will also provide employment opportunities for employees of Holcim's East Perth Plant when it is closed.
The potential contribution to the strategic direction or strategic outcomes identified in relevant State policies, plans or strategies including industry development initiatives or regional or sub-regional strategies.	The importance of concrete supply to the Perth CBD and inner city is highlighted in the State Infrastructure Strategy and Economic and Employment Lands Strategy, see below.
The potential to make an important contribution for the State or region to promotion of the sustainable use and development of land and the general principles of the State Planning Framework.	The proposal to redevelop an existing plant in proximity to the CBD with good access to the road network (Orrong Road and Leach Highway) is beneficial in minimising carbon emissions from longer distances to the delivery location. The redevelopment of the Plant will also include upgrade of the Water Management System currently in place.

On 14 April 2025, the Premier advised the Western Australian Planning Commission that the Application was of State and regional importance on the basis that "an uninterrupted supply of concrete is a vital component in delivering a variety of major projects in the Perth Central Business District and inner metropolitan area.

For these reasons, the Application raises issues of State and regional importance and is appropriate to be accepted and approved as an Application under Part 11B.

7.2.2 Be in the Public Interest

As the redevelopment of the Welshpool Plant is intended to ensure an ongoing and uninterrupted supply of concrete for infrastructure and major developments in the Perth CBD, approval of the Application therefore would be in the public interest.

The Application does not conflict with provisions of an applicable planning instrument and is capable of approval under the Town of Victoria Park Local Planning Scheme No. 2.

In addition, the redevelopment of the Plant provides the opportunity to redirect heavy vehicles from residential streets and relocate the noisier activities, such as slumping, that are presently at the Cohn Street end on the Site, closer to Briggs Street and provide walls and a roof over the slumping area to reduce noise. Further, the introduction of underground aggregate delivery and storage bins also reduces dust. The Plant redevelopment could be considered to be in the public interest as they reduce the potential for amenity impacts.

As outlined in the State Infrastructure Strategy:

> *Long-term land-use planning should also ensure the ongoing productive capability of inner metropolitan industrial land. Some near city industrial areas are experiencing ongoing pressures related to urbanisation and concerns around the potential impacts of truck movements, noise and other environmental factors. With limited remaining industrial zoned land in the inner metropolitan area, it is important that industrial land use provisions remain flexible enough to accommodate assets that are critical for the construction of infrastructure and need to be near the markets they serve. For example, concrete is a significant cost component of infrastructure projects, with proximity to market being critical to both the affordability and quality of the product. Two near-city concrete batching plants are scheduled to close in 2024 due to the expiry of existing planning approvals. The closure of 2 important supply points is a risk to the construction sector in the Perth CBD and inner metropolitan area due to increased transport costs and reductions in useable time of concrete from batching to placement. The WA Government has been working with the affected operators to identify appropriate alternate sites given the complexities of batching plant infrastructure specifications and the broader public interest in maintaining access to affordable supply. It is important that this process is resolved in a timely manner to ensure impacts and disruption are minimised. (Infrastructure WA July 2022) (*Emphasis Added*).*

Therefore, redevelopment of the Welshpool Plant to be the replacement plant for East Perth has a significant broader public interest of maintaining access to an affordable supply of concrete, particularly to inner city projects and infrastructure projects.

7.2.3 Preserve the Amenity of the Locality

The Concrete Batching Plant land use has approval and the more general "Industry" land use is discretionary in the relevant zone.

The proposed redevelopment of the Plant provides an opportunity to redirect heavy vehicles from residential streets and to relocate the noisier activities, such as slumping at the Briggs Street end of the Site, further from residential dwellings. In addition, the new slump stands will have walls and a roof, thus further reducing noise emissions. The introduction of wet mixing for night time operations will also assist to preserve the amenity of the locality as this will reduce dust and noise emissions as all mixing is undertaken within the enclose loading bay. The Application also introduces the use of underground bins for delivery of sand and aggregate, thus reducing dust emissions.

With implementation of the Traffic Management Plan, Noise Management Plan and an Air Quality Management Plan, together with the upgraded infrastructure and additional landscaping, the redeveloped Concrete Batching Plant will preserve and improve the amenity of the locality.

7.2.4 Be Consistent with Proper and Orderly Planning

The Application will provide an increase in capacity, necessary to fulfil its State and regional importance function to deliver concrete for major CBD development and infrastructure projects. However, with the implementation of new contemporary infrastructure and management practices, the Concrete Batching Plant will comply with all relevant legislative requirements and result in an overall improvement to the locality.

Pursuant to LPS2, the land use is permissible at the Subject Site, consistent with its Industrial designation under the MRS.

The Subject Site is ideally located to become the replacement Plant for Holcim's East Perth Plant, which operates under a time limited approval, which expires on 31 December 2027. Given the proximity to the Perth CBD, this Plant will be able to be used to supply high specification concrete to the CBD and other major infrastructure projects as required.

The supply of concrete from an inner Metropolitan Concrete Batching Plant is a critical component to delivering the infrastructure, commercial, housing and other projects in the Perth CBD and inner metropolitan area. The loss of significant concrete production capacity in the CBD will have an immediate effect on the delivery of affordable concrete supply if there is not a seamless transition of operations to the replacement site at the Welshpool Plant.

The importance of a well located near-city location, such as Carlisle, is significant because:

- The Welshpool Plant has easy access to Orrong Road, via Briggs Street (located within an Industrial area) and this provides access to the major transport routes and the Perth CBD via Graham Farmer Freeway. This ensures the Welshpool Plant can provide efficient and a timely provision of concrete to construction projects, including importantly, "top up" pours as required;
- Concrete has a limited 'shelf life' with the formation of concrete as a time dependent chemical reaction. This is especially pertinent for high specification concrete to meet Australian Standards under AS1379. Concrete must be transported quickly from the Plant to its destination to prevent concrete temperature exceeding 35 degrees, and in the most sustainable manner to ensure construction costs are minimised. This in turn contributes to meeting the State's affordable infrastructure and housing objectives;
- Independent engineering specifications for major projects (both Government infrastructure and private developments) may require a more stringent discharge requirement than AS1379. These examples are reflective of reduced delivery times to be placed within 45 minutes (Pracsys Report to WAPC (2017));
- The Plant at Carlisle is well placed to be able to deliver concrete to best achieve compliance with Australian Standards (**AS**) and will be the closest Plant to the Perth CBD;
- Redevelopment of the existing batching facility at Carlisle, being reasonably close to the CBD, minimises both the number of trucks on the road and the distances to travel to CBD destinations in the most sustainable manner. This results in less impact from CO_2 emissions, energy use, pollution, travel time and costs affecting affordability.

For these reasons, approval of this Application would be consistent with proper and orderly planning. Concrete is a significant cost component for infrastructure projects, with proximity to market being critical to both the affordability and quality of the product. Approval of this Application will ensure that there is an ongoing supply of high specification concrete for inner city projects as well as for government projects, ensuring a sustainable and affordable concrete supply into the future.

8.0 CONCLUSION

This application seeks approval of the Western Australian Planning Commission for the redevelopment of the existing concrete batching plant on site.

This proposal brings an opportunity to introduce modern standards to a site that has operated as a concrete batching plant for more than 60 years. By redeveloping the site, a review of the location of each component of the batching plant has occurred and the new design is focussed on minimising the potential for impact to the residential properties along Cohn Street, especially in terms of the potential noise and dust impacts.

The redevelopment of the site will also bring employment opportunities, during the construction phase in terms of its contribution to supplying major projects, in the CBD and inner metropolitan Perth.

With the required closure of Holcim's East Perth plant in the coming years, it is imperative that an alternative site in close proximity to the Perth Central Business District was found to ensure ongoing supply of concrete to the inner metropolitan Perth.

The Subject Site, with its existing concrete batching plant, was seen as an opportunity to not only provide for a site that can supply concrete in years to come, but also to redevelop the site in order to reduce/minimise impacts on the nearby residential properties.

For these reasons, the site is considered to represent a positive outcome for not only the nearby residents, but for the inner city area as it will ensure a reliable source of concrete to the inner City into the future.

For this reason, we respectfully request that Western Australian Planning Commission approve this application.

Figure 16: Perspective of proposed redeveloped Welshpool Plant

ATTACHMENT 1

Premier Approval and Development Application Forms

ATTACHMENT 2

Development Plans

ATTACHMENT 3

Landscape Plan

ATTACHMENT 4

Feature Survey

ATTACHMENT 5

2021 JDAP Approval and approved plans

ATTACHMENT 6

Certificate of Title, Deposited Plan and Memorial

ATTACHMENT 7

Contaminated Sites Information

ATTACHMENT 8

Acoustic Assessment

ATTACHMENT 9

Noise Management Plan

ATTACHMENT 10

Transport Impact Statement

ATTACHMENT 11

Traffic Management Plan

ATTACHMENT 12

Surface Water Assessment

ATTACHMENT 13

Air Quality Modelling Report and Air Quality Management Plan

ATTACHMENT 14

Arboricultural Report

ATTACHMENT 15

Lighting Design Report and Lighting Plan

ATTACHMENT 16

Visual Assessment Report

ATTACHMENT 17

Perspectives and Renders

ATTACHMENT 18

Waste Management Plan

ATTACHMENT 19

Holcim's Environmental Policy

ATTACHMENT 20

Meeting Record:

Part 11B Pre-lodgement Meeting

Holcim Replacement Concrete Batching Plant