

Key Issue/Theme	Applicant's response
<p><u>Noise and vibrations:</u></p> <ul style="list-style-type: none"> <li>○ Concerns that ongoing and excessive noise are incompatible with nearby residential living.</li> <li>○ Concerns 24/7 operations would worsen noise impacts.</li> </ul>	<p>The Proponent has undertaken a Noise Assessment and prepared an Operational Noise Management Plan for the proposed plant redevelopment which demonstrates compliance with the <i>Environmental Protection (Noise) Regulations 1997</i> (Noise Regulations) for both day and night operations. The key measures which provide compliance with the Noise Regulations are noise walls to attenuate noise emissions, no requirement for a front end loader for production and the operation of a wet plant at night.</p> <p>The core plant will be located behind the central noise wall which, together with the noise wall on Cohn Street, noise walls on the side boundaries of the plant and other noise amelioration measures, will ensure that the development will comply with the <i>Environmental Protection (Noise) Regulations 1997</i>.</p> <p>No front end loader will be required for production due to the in-ground aggregates delivery, enclosed conveyors and aggregates storage tower. The elimination of a front end loader for production will reduce noise emissions generated.</p> <p>A wet mix plant is proposed to be operated at night time which 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 because water is added at the beginning of the process, and all mixing occurs within a sealed and housed environment, eliminating the need for slumping which is a noisier activity, ensuring compliance with the Noise Regulations during the night period.</p> <p>Given the measures proposed to be implemented in accordance with the Operational Noise Management Plan, it is considered that the noise emissions will not adversely affect the amenity of nearby residents and be compliant with the Noise Regulations for both the day and night periods and noise impacts would not worsen.</p>
<p><u>Hours of operation</u></p> <ul style="list-style-type: none"> <li>○ Concerns that current day-time noise is already problematic with night operations considered unacceptable.</li> </ul>	<p>Refer to response above.</p>

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<ul style="list-style-type: none"> <li>○ Concerns that extended hours will disrupt sleep and family life.</li> </ul>	
<p><u>Dust, odour and light pollution</u></p> <ul style="list-style-type: none"> <li>○ Concerns of high dust levels from concrete production already impacting residents.</li> <li>○ Concerns relating to include respiratory problems and other health impacts.</li> <li>○ Concerns that existing mitigation measures have been inadequate.</li> <li>○ Concerns odour and light spill will impact resident liability.</li> </ul>	<p>The plant redevelopment will introduce new equipment which have been designed to minimise potential for dust generation.</p> <p>The new plant will introduce a new system whereby raw aggregate and sand is delivered in an area where materials are dropped into an underground hopper and then transported via an enclosed conveyor system to the enclosed aggregate storage tower at the Briggs Street end of the site. The material for each agitator is weighed and transported to the aggregate loading bays by an enclosed conveyor system for dispatch to the agitators. The enclosed and improved measures incorporating additional dust control measures, including enclosed conveyors and aggregate storage tower, 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. This is an improvement on the existing plant where open aggregate bins are used with a front end loader to transport aggregates within the site reducing the potential for fugitive dust.</p> <p>The Proponent has undertaken an Air Quality Assessment and prepared an Air Quality Management Plan for the proposed new plant where predicted concentrations are well below the National Environmental Protection Measure (<b>NEPM</b>) limits for particulates (dust).</p> <p>As outlined in the Air Quality Management Plan and in addition to the new equipment described above, the Welshpool concrete plant redevelopment has been designed to have the following dust control and mitigate measures:</p> <ul style="list-style-type: none"> <li>• All areas will be paved and swept regularly including the prompt cleaning of any spilled materials;</li> <li>• Covered conveyors and transfer points to move aggregate to holding hoppers;</li> <li>• Fully enclosed holding hoppers;</li> <li>• Enclosed cement loading bay with dust extraction;</li> <li>• Use of an enclosed pneumatic transfer system for cement unloading into silos with dust extraction;</li> <li>• Automatic silo fill system that stops if silo becomes full;</li> <li>• Enclosed aggregate storage tower;</li> </ul>

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	<ul style="list-style-type: none"> <li>• Conducting visual inspections of the site;</li> <li>• Maintenance of the equipment when appropriate; and</li> <li>• Enclosed loading bay with dust extraction system.</li> </ul> <p>In addition, the Air Quality Management Plan outlines that Holcim will undertake a dust monitoring programme comprising monitoring for a week during each quarter of the year using an appropriate real time monitor for a 12-month period to verify the predicted dust concentrations arising from the development. The results of the monitoring will be provided to the Town of Victoria Park for review after the monitoring has been undertaken each quarter by a date agreed to by the Town of Victoria Park and Holcim.</p> <p>Holcim would ensure compliance with the Air Quality Management Plan at all times, noting the commitments for monitoring, complaints handling and an annual review of the air quality management plan.</p> <p>In regard to light spill, the lighting design report confirms that the lighting has been designed to comply with the standards detailed in Australian Standard ASNZ4282-2023 Control of obtrusive effect of outdoor lighting.</p> <p>The concrete batching process does not produce any significant or discernible odour.</p>
<p><u>Location and land use:</u></p> <ul style="list-style-type: none"> <li>○ Concerns raised the site should be used for light industry</li> <li>○ Suggestions made for the proposal to be further away from homes.</li> <li>○ Concerns raised toward an intensive industrial use and activities next to homes, schools, and childcare.</li> <li>○ Concerns the proposal will impact potential development of the Oats Street Station precinct.</li> </ul>	<p>The site has approval to operate as a concrete batching plant and an Industry land use is a discretionary land use in the Industry zone.</p> <p>The application proposes redesign of the plant and a number of mitigation measures in regard to noise, dust and light to minimise the potential for adverse impacts, particularly for residences on Cohn Street.</p> <p>A google search for the closest child care centre is that the closest centre is Cuddle Early Learning located on the corner of Oats Street and Rutland Avenue being 180-200m from the Subject Site and the closest school is Australian Islamic School located at 139 President Street, Kewdale more than 1</p>

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<ul style="list-style-type: none"> <li>○ Suggestions made for a more suitable industrial areas such as Welshpool or Kewdale</li> <li>○ Comments made toward comparison to closure of similar facilities in East Perth due to residential incompatibility.</li> </ul>	<p>kilometre from Subject Site. Carlisle Primary School and East Victoria Park Primary School are located more than 1.5 kilometres from Holcim Welshpool.</p> <p>The Oats Street Station Precinct Structure Plan is being assessed separately by the WAPC.</p>
<p><u>Truck activity and traffic:</u></p> <ul style="list-style-type: none"> <li>○ Concern raised towards increased heavy vehicle movements.</li> <li>○ Concern raised toward traffic volumes and safety impacts in residential streets, including near schools.</li> </ul>	<p>All heavy vehicle movements will be on roads within the Industrial area or on regional roads, unless for local deliveries.</p> <p>The closest school is Australian Islamic School is located more than 1 kilometre from the Subject Site with no vehicle movements proposed near to the school. Carlisle Primary School and East Victoria Park Primary School are located more than 1.5 kilometres from Holcim Welshpool.</p>
<p><u>Height of proposed development:</u></p> <ul style="list-style-type: none"> <li>○ Concerns the proposed silos are out of scale with surroundings.</li> <li>○ Concerns raised toward visual impact on neighbourhood character</li> <li>○ Concerns raised that approval would set a precedent for inappropriate large-scale structures in the area.</li> </ul>	<p>The redevelopment of the site has resulted in the relocation of the taller elements (silos and aggregate storage building) closer to Briggs Street and further away from the low density residential housing in Cohn Street.</p> <p>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. 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 concrete batching plant and associated silo structures nor the aggregate storage tower will have an adverse impact upon the amenity of the locality.</p> <p>The visual assessment provided at <b>Attachment 16 to the DA package</b> provides further comment in regard to context and concludes that:</p>

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	<p><i>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.</i></p> <p><i>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.</i></p> <p>Given the draft Oats Street Station Structure Plan proposing development up to six (6) storeys in the station core and mixed use frame (south of Tuckett Street) and noting that there is a current development approval for a building of 18 storeys in Bank Street, it is considered that the proposed development subject of this application will not set a precedent.</p>
<p><u>Impact on property values:</u></p> <ul style="list-style-type: none"> <li>○ Concerns the proposal will reduce market value of nearby homes.</li> <li>○ Concerns property investment confidence in the area will decline.</li> </ul>	<p>The Subject Site has approval to operate as a concrete batching plant and has operated as a concrete batching plant for approximately 60 years. The landscaping proposed presents an improvement to the visual appearance from Cohn Street. In addition, the rendered perspectives demonstrate that it is only the silos that will be visible from Cohn Street, noting that existing silos are also currently visible from Cohn Street.</p>
<p><u>Other:</u></p> <ul style="list-style-type: none"> <li>○ Concerns the public consultation period was too short.</li> </ul>	<p>The public consultation period is guided by legislation and is implemented by the Western Australian Planning Commission in accordance with the legislation.</p>