

20 August 2024

Albury City
PO Box 323
Albury NSW 2640

Attention: Robert Duncan, Senior Town Planner

Via Email

Dear Robert,

**Re: Supporting information for consideration of DA 10.2024.40751.1
21 McLaurin Road, Ettamogah**

Habitat continues to act on behalf of Barker Group NSW Pty Ltd ("the applicant"), in relation to a development application for an industrial development at 21 McLaurin Road, Ettamogah.

The application was considered at the meeting of the Southern Regional Planning Panel ("the Panel") on 31 June 2024. The Panel requested that further information and detail be provided prior to a determination being made.

The requested information primarily relates to the nature and operations of the proposed industrial use, and consideration of the potential impacts arising from the operations.

The below sets out further detail regarding the specific operations of the proposed development and the nature of the intended use. It also provides further consideration of impacts from the specific activities and use. This letter is provided as an addendum to the previously submitted Statement of Environmental Effects prepared by Habitat Planning.

1. Amended Plans

In support of the proposal, the following revised plans and information is provided for Council's consideration.

Plan	Author	Rev / Date
Shed Floor Plan	R&D Designs Plus	C / 19/08/2024
Equipment Fitout	R&D Designs Plus	C / 19/08/2024
Site Layout	R&D Designs Plus	C / 19/08/2024
Truck Movement	R&D Designs Plus	C / 19/08/2024

2. Proposed Industrial Activity

This information should be read in conjunction with Section 3 of the SEE (version 2.0, dated 3 July 2024).

The proposed land use has been described throughout the application as 'general industry', which is defined in the Albury LEP as *"a building or place (other than a heavy industry or light industry) that is used to carry out an industrial activity"*. Industrial activity means *"the manufacturing, production, assembling, altering, formulating, repairing, renovating, ornamenting, finishing, cleaning, washing, dismantling, transforming, processing, recycling, adapting or servicing of, or the research and development of, any goods, substances, food, products or articles for commercial purposes, and includes any storage or transportation associated with any such activity"*.

2.1. Industrial process

The premises is intended to be used by a local steel manufacturer for the purpose of design, manufacture, coating, packaging and distributing of steel products. This includes a range of metal products such as industrial mixer bowls, structural steel products, modular building frames, conveyors, platforms, stairs and ramping, weighbridges, and pipes.

The company services businesses in a range of industries including defence, government, mining, aquaculture and recycling.

The business sources steel from a range of manufacturers which is delivered as either a plate or a beam and transforms the materials into purpose-built products and structures designed to the specifications of each client and end user.

Raw materials, including steel/metal and associated input components are delivered to site and stored for the production and manufacture process.

All processing and manufacturing works will be undertaken within the building, utilising a variety of custom plant and equipment, including robotic components.

The internal area of the proposed building is divided into specific work zones, being 'processing', which includes robotic welding and cutting components, along with components for rolling and cutting of steel to be utilised on manufacture of end products. A 'manufacturing' zone comprises space for the manufacture of products utilising steel components in a production line format. The rear of the building will be utilised for sandblasting and coating components, which will be conducted within specially design booths within the main building. Components are then fed into the packaging and outgoing lines for delivery off-site.

The submitted architectural plans **attached** includes details of the proposed arrangement of plant and equipment, demonstrating the arrangement of equipment and locations within which the various processing, manufacturing, coating, packaging and delivery components are carried out.

2.2. Traffic, Circulation and Parking

Deliveries to the site are expected to occur throughout the day, by a combination of rigid vehicles and semi-trailers who will travel along the primary freight network into the industrial estate of NEXUS to provide raw steel product to the premises. Similar-sized trucks will also distribute the products constructed on-site to the end user, which could be located anywhere across Australia.

Products will be packaged onto pallets where possible, or directly onto truck or utility vehicle trays where required.

An average of 6 to 10 truck movements are expected to occur from the site each day, though this may vary depending on the size and scale of each project.

Loading and unloading will occur at designated locations across the site and at suitable docking bays within the building. Typically, trucks will load and unload along the southern and northern aprons of

the building, with forklifts transporting material to and from the internal warehouse and outgoing areas. Allowance has been made for trucks to enter and exit the building for loading and unloading, as shown on the submitted architectural plans **attached**.

Raw materials may be stored outside where required, though outdoor storage will not impede on truck and vehicle manoeuvring areas, and will be suitably screened from view from the public realm by proposed landscape plantings along the western boundary.

2.3. Stormwater re-use

The proposed development is supported by an extensive stormwater management system which has been designed by an accredited engineer. The stormwater layout and landscape plan work hand in hand to direct excess stormwater into the bioretention basin plantings, as well as the swale plantings.

Though 2 x 22500L rainwater tanks are provided to the development, these are not intended to be used for irrigation, however may be used for reuse within the building.

3. Assessment of Impacts

This information should be read in conjunction with Section 5 of the SEE (version 2.0, dated 3 July 2024).

3.1. Amenity impacts

The manufacture of steel products from the facility which includes cutting, rolling, welding and sand blasting, which creates potential for off-site noise, dust and emission impacts if not suitably managed.

The proposed building will enclose all manufacturing activities, meaning that noise generating activities will be located within the enclosed walls of the proposed building. Noise generating activities external to the building are mainly limited to unloading and loading activities of vehicles, which are not expected to be projected beyond the industrial estate environs given the large area of the precinct.

The building has been designed to minimise any noise transfer from internal operations to areas external to the building. Areas used for the purposes of blasting (i.e. mechanical cleaning or sand blasting) will be enclosed within specially designed booths which provide an additional layer of noise, dust and emissions insulation internal of the building.

Manufacturing processes of the facility may result in vibration impacts, however given the nature of the works, these would be minimal and likely to be contained to the internal areas of the building only. This potential impact will be managed and mitigated by utilising the best available technology and processes.

The proposal is not expected to generate any significant emissions, given the processes on site will involve manufacturing and fabrication of steel products. Dust emissions may be created by some internal processes (such as blasting), however will be captured internally. Though 24-hour lighting is proposed, this will be suitably baffled to ensure it is not unreasonably emitted outside of the property boundary.

The proposal will not generate noise of a type or level that would be out of character for an industrial area. The NEXUS Industrial Precinct has significant buffer distances to sensitive receivers which are located well away from the site. The significant buffer distances are considered to minimise any potential adverse effects such as noise.

It should be noted that all proposed construction works will be carried out in accordance with AS 2436:2010—Guide to noise control on construction, maintenance and demolition sites.

The location of the development within the NEXUS Industrial Precinct is considered desirable for the proposed industrial use. The NEXUS precinct is within the Albury Regional Job Precinct Master Plan, which designates the precinct as being a location to accommodate high impact industrial activities. *Visy Paper Albury* is in operation to the east from the subject site, and *Circular Plastics Australia* is located opposite the subject site. These are significant existing operations that have amenity impacts in excess of that of the proposal.

The combination of internal arrangement of building and work space, separation distance from the site, topography, and vegetation assists in minimising any impacts on residential areas. It is further emphasised that the NEXUS precinct has been strategically located and designed to facilitate activities that may have an impact on amenity, and as a consequence incorporate mitigation measures listed above.

3.2. Car parking, traffic and access

The site is within a purpose built industrial precinct with easy access to heavy vehicle networks and freight corridors. The site is also within the area known as the Albury Regional Jobs Precinct and therefore has been identified and serviced with infrastructure capable of accommodating larger scale industries.

The subject site, and NEXUS generally is serviced with sealed industrial roads. All roads which externally service NEXUS are approved B-double heavy vehicle routes and enable safe and efficient access to the site.

The proposed activity sought for the site will generate movements to and from the site by way of passenger vehicles, for staff, and heavy vehicles for delivery and distribution of material. Passenger vehicles will be accommodated at the frontage of the site and enable visitors and staff to enter and exit through the office component of the building. Heavy vehicles will be directed to the rear of the site and circulate around the building in a forward direction.

The proposed tenant of the building will employ a total of 150 staff, including administrative and operational staff. Based on the 24-hour operations proposed, it is expected that a maximum of 100 staff will be present on-site at shift changeover time, which will be accommodated in the 95 car parking spaces, 4 motorcycle spaces, and 10 bicycle spaces. End of trip facilities are also provided in the administration area, including five combined shower and change rooms.

The proposal will generate, on average, a total of 6 to 10 truck movements per day for inward and outward movement of goods. This may vary depending on the size and scale of each project. These movements are considered to be within the capacity of the road network of NEXUS, and well within the anticipated average movements per site.

Loading and unloading of heavy vehicles will occur at designated locations across the site and at suitable bays within the building. Typically, trucks will load and unload along the southern and northern aprons of the building, with forklifts transporting material to and from the internal warehouse and outgoing areas. Allowance has been made for trucks to enter and exit the building for loading and unloading, as shown on the submitted architectural plans **attached**.

Visitation to the site is limited and accordingly it would be rare that visitor car parking would be required. In the event that overflow car parking is required, there is a hardstand area to the south of the building where overflow parking can be provided if required, including truck parking.

The proposed car parking is considered to suitably provide for the proposed use and anticipated demand at peak times.

4. Changes to conditions

Further to the above, the applicant has reviewed the conditions contained within the draft Notice of Determination and has identified a number of minor changes for consideration.

These amendments are provided in the below table.

Condition number	Requested change
A1	The table lists the superseded plans and also does not include the civil plans or retaining wall plans. It is suggested that the table be updated to include all relevant plans for endorsement, and the most recent version of all plans.
A10	The developer would like to request that the payment of contribution plans be deferred until Occupation Certificate.
A11	The developer would request that this condition be amended as follows (addition in underline): <i>Switchboards, air conditioning units, garbage storage areas and storage for other utilities shall not be attached to the front elevations of the building or side elevations that can be seen from a public place, <u>unless appropriately screened</u></i>
D7	Given the industrial nature of the development context, the developer requests that the construction hours could be amended to allow works between 6am – 6pm, 7 days per week.
E3	The developer requests this condition be removed or an alternative solution provided.
F11	The application has been made seeking external storage, as confirmed during assessment. The heading of the condition appears to be confusing at the content of the condition does not appear to have the intention of preventing storage. It qualifies that there should be no external storage <u>unless appropriately screened</u> , which we have proposed via landscaping treatments. The developer requests greater clarity around the condition and would request that this condition be deleted or amended to have the heading modified to 'External Storage' and clarify that external storage is permitted subject to maintaining appropriate screening (which we believe is the intention of the condition).

We trust that the above and attached information is sufficient to allow the determination of the application to be considered at the next meeting of the Panel.

Should you have any queries please contact the undersigned directly on 6021 0662 or david@habitatplanning.com.au.



David Hunter
Director