

Response to Submissions

Glebe Island Cement Silos Capacity Increase– SSD 8595604

Lot 12, Sommerville Road, Rozelle
Cement Australia Holdings Pty Ltd



'Gura Bulga'

Liz Belanjee Cameron



'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.

By using the green and blue colours to represent NSW, this painting unites the contrasting landscapes. The use of green symbolises tranquillity and health. The colour cyan, a greenish-blue, sparks feelings of calmness and reminds us of the importance of nature, while various shades of blue hues denote emotions of new beginnings and growth. The use of emerald green in this image speaks of place as a fluid moving topography of rhythmic connection, echoed by densely layered patterning and symbolic shapes which project the hypnotic vibrations of the earth, waterways and skies.

Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We acknowledge the Gadigal people, of the Eora Nation, the Traditional Custodians of the land where this document was prepared, and all peoples and nations from lands affected.

We pay our respects to their Elders past, present and emerging.

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Ethos Urban / Cement Australia
- B** Noise Impact Assessment Addendum
ERM
- C** Amended Noise Impact Assessment
ERM
- D** Traffic Report Addendum
Traffix

1.0 Introduction

An Environmental Impact Statement (EIS) was lodged on 11 April 2018 on the behalf of Cement Australia Holdings Pty Ltd (Cement Australia) which seeks the increase of annual throughput capacity of cementitious material from 500,000 tonnes per annum (tpa) to 1,200,000 tpa at the existing cement handling and distribution facility operated by Cement Australia at Glebe Island.

(It is noted that although this application has been designated a SSD number (SSD 8595604), the proposal is not defined as State Significant Development).

The Development Application and associated EIS were publicly exhibited for a period of twenty-eight (28) days inclusive between 3 March 2022 and 30 March 2022.

The site at Lot 12, Sommerville Road, Rozelle is located in The Bays Precinct which is identified as a State Significant Development Site in Schedule 6 of State Environmental Planning Policy (State Significant Precincts) 2005. Development within the area identified as Glebe Island, White Bay, Rozelle Bay and Blackwattle Bay on the Sydney Harbour Port and Related Employment Lands Map, being development with a capital investment value of not more than \$10 million that is carried out by a person other than a public authority specifies the Minister as the consent authority for the purposes of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

Wharf-side facilities at which cargo is loaded onto vessels, unloaded from vessels, or temporarily stored at a rate of more than 500 tonnes per day or 50,000 tonnes per year are classified as designated development pursuant to Clause 30 of Schedule 3 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). As the proposal is for a throughput rate of up to 1,200,000 tonnes per annum, being an increase of up to 700,000 tonnes per annum, it is considered to be designated development.

The Site is owned by the Port Authority of NSW (Port Authority).

This report summarises the matters raised during the exhibition of the DA and provides a detailed and considered response to each topic. The matters raised in the public and agency submissions are considered to have been fully addressed in the additional assessments carried out or otherwise through responses providing further information or clarifications. No further engagement has been carried out and no project amendments are proposed.

2.0 Summary of Submissions

The application was publicly exhibited for a period of twenty-eight (28) days inclusive between 3 March 2022 and 30 March 2022. Public exhibition occurred in accordance with the requirements of the EP&A Act. This section of the report provides a summary of the matters raised by the Department of Planning and Environment (DPE), other government agencies and authorities, and by the public, during the public exhibition of the application.

Eighty-three (83) submissions were received in response to the public exhibition of the EIS, including submissions made by government authorities and agencies, and the public, as follows:

- Five (5) submissions were received from government, agencies, and organisations in response to the exhibition of the EIS. Specifically, responses were received from:
 - DPE;
 - Transport for NSW (TfNSW);
 - Heritage NSW;
 - Inner West Council (Council); and
 - The NSW Environmental Protection Authority (EPA).

A response to each of these submissions has been prepared and is provided by topic in **Section 3** below.

- 78 submissions from members of the public and community groups, including:
 - 2 submissions of support;
 - 3 general comments; and
 - 73 submissions in objection.

A summary of the content of the public submissions is provided in **Appendix A**.

The key matters raised in the submissions can be broadly grouped into six (6) categories. These categories are listed below in **Table 1** and **Figure 1**, along with a reference to where further discussion in relation to this topic can be found within this document. A visual representation of the frequency that each of these issues was raised within the submissions of objection, and therefore the relative importance of the issue to the objectors, is provided as **Figure 1**. A considered and detailed response to submissions has been provided in the accompanying documentation, with the key matters outlined above expanded on in **Section 4.0**. As shown below, issues raised within the public submissions primarily focussed on amenity impacts, including air quality, visual and traffic impacts for local residents.

Table 1 *Public submission topic summary table*

Topic Category	Times raised in public submissions (78 total)	Percentage of public submissions	Discussion Reference
Noise	61	78%	Section 4.1
Air Quality	53	70%	Section 4.2
Traffic	33	42%	Section 0
Light	17	22%	Section 0
Cumulative Impacts	10	13%	Section 0
Other	18	23%	Section 5.0

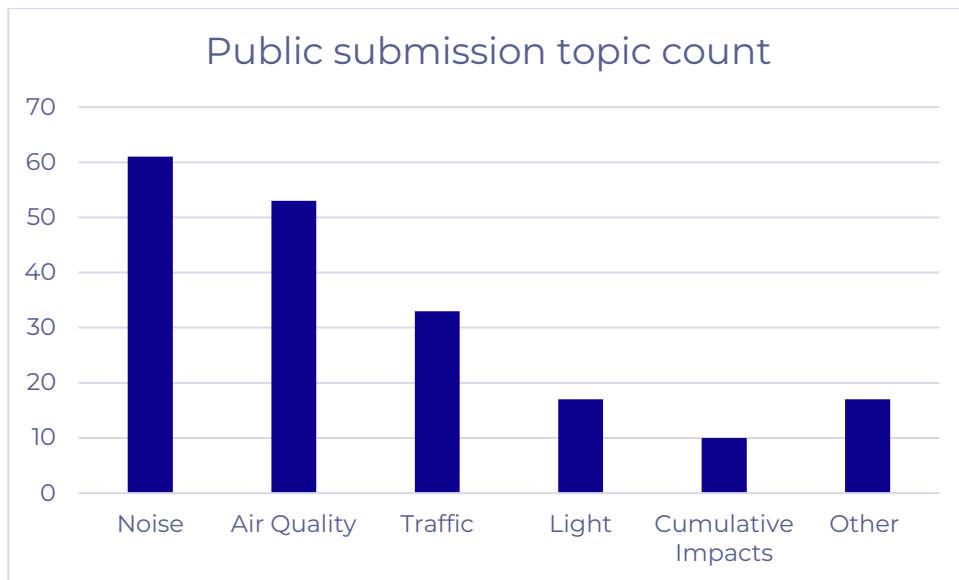


Figure 1 *Public submission topic count*

3.0 Further Information and Assessments

In response to the issues raised in submission additional assessment has been undertaken by the project team where necessary to respond to submissions and provide further assessment where required. The additional assessment is appended to this Submissions Report (refer to Table of Contents) and comprises:

- Noise Impact Assessment Addendum prepared by ERM (**Appendix B**);
- Amended Noise Impact Assessment prepared by ERM (**Appendix C**); and
- Traffic Report Addendum prepared by Traffix (**Appendix D**).

3.1 Noise

The Noise Impact Assessment Addendum and the Amended Noise Impact Assessment are to be read in conjunction with each other. The Noise Impact Assessment Addendum (**Appendix B**) provides a direct response to the matters identified by DPE and the EPA, which are summarised in **Section 4.1** below. The Amended Noise Impact Assessment (**Appendix C**) sets out the amendments to Noise Impact Assessment, consistent with the responses provided in the Addendum, and is further summarised below.

3.1.1 Noise Assessment Criteria

The Vessel Target Noise Levels remain in accordance with the Glebe Island and White Bay Port Noise Policy, as follows:

- Daytime $L_{Aeq,15hr}$ of 60 dBA averaged over 15 hours from 7am to 10pm.
- Night time $L_{Aeq,9hr}$ of 55 dBA averaged over 9 hours from 10pm to 7am,
- Night time L_{Amax} of 65 dBA.

As requested by the EPA, the Amended NIA has adopted revised landside noise trigger levels, which have been conservatively derived based on the Noise Policy for Industry amenity criteria for an urban industrial interface minus 10dB. Section 4.2.2 of the Amended NIA has therefore been updated to include the following landside noise trigger levels:

- Day – 55 dB(A) $L_{eq,11h}$
- Evening – 45 dB(A) $L_{eq,4h}$
- Night – 40 dB(A) $L_{eq,9h}$

Precinct Cumulative Noise Limits have been established under the Landside Precinct Noise Guideline, which form part of the Glebe Island and White Bay Port Noise Policy, and which adopts the approach of noise management precincts outlined in the EPA's Noise Policy for Industry. The Precinct Cumulative Noise Limits indicate the total noise limit for all landside activities within the port combined, and are as follows:

- Day – 65 dB(A) $L_{eq,11h}$
- Evening – 55 dB(A) $L_{eq,4h}$
- Night – 50 dB(A) $L_{eq,9h}$

Sleep disturbance noise criteria remain unchanged, with a relevant noise level for further evaluation in relation to sleep disturbance is an L_{MAX} of 65 dBA. Road traffic noise criteria also remain unchanged, with an objective that any increase in the total traffic level should be limited to 2 dBA above the road traffic noise level prior to the development.

3.1.2 Sensitive Receptors and Existing Background Noise

The identification and location of sensitive receptors has not changed, noting that two Noise Sensitive Catchment Areas in Balmain (Batty Street and Donnelly Street respectively) represent the closest sensitive receivers. Background noise levels at the sensitive receivers also has not changed in the Amended NIA.

3.1.3 Noise Assessment

The vessel noise assessment remains largely unchanged, other than an error has been fixed in relation to the day-time vessel noise trigger level of $L_{Aeq,15hour}$ of 60 dBA. Compliance with this trigger level is still achieved, with maximum vessel noise predicted at $L_{Aeq,15min}$ of 58 dBA during the daytime. The previously predicted 2dBA exceedance of the $L_{Aeq,9hour}$ 55 dBA night time vessel noise trigger level is still predicted. It is highlighted that the assessed noise levels are conservative as they represents the maximum 15-minute averaged noise level recorded, compared to the Vessel Target Noise Level which is a period averaged noise level (15 hours in the day time and 9 hours in the night time). In particular, noting that the emitted noise is unlikely to be consistently at this maximum level during the entire period the $Leq(period)$ noise assessment levels from the vessels are likely to be lower than the maximum measured $Leq(15-min)$ value due to time-averaging.

Landside noise assessment has been subject of further noise model calibration and verification as requested by the EPA. Section 6.1.3 of the Amended NIA includes detailed description of the additional noise monitoring undertaken, which focused on verifying noise from on-site plant and equipment. Landside noise assessment has also been amended via the establishment of revised landside noise trigger levels as identified above. The revised noise modelling confirms the previous noise modelling results, and demonstrates compliance with the revised landside noise trigger levels in all circumstances except for a 1dBA exceedance at the Batty Street receiver area during the night time period. A 1 dBA exceedance is considered to be marginal and imperceptible in practice. Given that these landside noise trigger levels are set at 10 dBA lower than the Collective Benchmark Noise Level, compliance will ensure that the Cement Australia operations at the Glebe Island Silos will not significantly contribute to any increase in noise from overall port activities.

There are no changes to the noise assessment for sleep disturbance or road traffic noise, which remain compliant.

A revised cumulative noise assessment has also been carried out, taking into account the Hanson Aggregate Terminal, the Sydney Metro West construction activities, the White Bay Cruise Terminal and the Gypsum Terminal. Cumulative noise modelling confirms that the predicted cumulative noise level would continue to comply with the Precinct Cumulative Noise Limits.

3.2 Traffic

The Traffic Report Addendum provided at **Appendix C** does not include any additional assessments, but rather provides further information and clarification in response to queries raised by TfNSW, DPE and Inner West Council. The additional information includes the following:

- Justification of the suitability of the base traffic model, highlighting the minimal additional traffic generation during peak periods;
- Clarification that the assessment of 12 vehicle movements per hour is the maximum possible trip generation from the site due to the limitations of the existing weighbridges, which represents the 'worst case' scenario that has been assessed as a sensitivity test;
- Further clarification of the predicted hourly vehicle generation rates – indicating that there is not expected to be any substantial change in the number of 1-hour periods where more than 8 trucks per hour are accessing the site between 7am and 4pm;
- Confirmation that truck haulage routes are limited to James Craig Road via Sommerville Road;
- Comment on impacts of the WestConnex Rozelle Interchange on the traffic impacts of the proposal, indicating that the WestConnex and Western Harbour Tunnel projects are anticipated to significantly improve the performances of surrounding intersections, and as such that redoing the traffic modelling with the expected future road layouts is unnecessary and onerous; and
- Further explanation why Cement Australia cannot control the reinstatement of Glebe Island Bridge for active and public transport (as its not in the Cement Australia site), the delivery of the proposed foreshore public access area (which is subject of broader consideration by the Port Authority of NSW), and the development of future light rail links to White Bay.

4.0 Summary of Submissions and Responses

A detailed summary of each government, agency, and organisation submissions received has been provided by topic in the relevant table below along with a response to each submission. A summary of the public submissions received has been provided in **Appendix A**, along with a response to these issues by topic in the relevant table below.

4.1 Acoustic Impacts

4.1.1 Issues Raised in Agency Submissions

Acoustic impacts were raised by the EPA and DPE. Submissions included the following considerations:

- Use of appropriate noise criteria;
- Clarification of some matters in the noise impact assessment (NIA); and
- Additional noise assessment to be undertaken.

ERM have prepared a Noise Impact Assessment Addendum (NIA Addendum) which accompanies this RtS in **Appendix B** setting out ERM's responses to the acoustic issues raised in submissions, as well as an Amended Noise Impact Assessment (**Appendix C**). A summary of the responses to the agency issues has been provided below.

Table 2 Agency noise issues and responses

Matter raised	Agency	Response
Confirm whether it is appropriate for noise impacts from project to be assessed and managed in accordance with the principles outlined in the Glebe Island and White Bay Noise Policy (GIWBPNP) rather than the Noise Policy for Industry (NPI),	EPA	The GIWBPNP includes a Vessel Noise Guideline which manages noise from vessels and seeks to implement a framework that achieves continual improvement in vessel noise. The framework established under the GIWBPNP will ensure that vessel noise limits are adhered to, or inform a process to establish appropriate mitigation measures to ensure compliance with the noise limits over time for each vessel.
<p>The increase in frequency of vessels to service the proposed increased throughput should be managed via the GIWBPNP noting that some vessels servicing Cement Australia have been subject to noise mitigation in a proactive attempt to satisfy the GIWBPNP. The vessels involved in the mitigation program are: Akuna, Wyuna and Kondili. The NIA suggests that vessels servicing Cement Australia will closely approach the vessel trigger noise levels with a 2dB exceedance identified at Batty Street Balmain (see NIA, Table 3.4). Any planning approval could seek to reinforce the GIWBPNP by requiring that only ships that either meet or have been noise attenuated to seek to meet the GIWBPNP be used to service the development.</p> <p>The NIA appears to erroneously apply a +5dB adjustment to the vessel trigger noise levels in Section 5 when a daytime VTNL(Vessel Trigger Noise Level) of 65dB is noted. The VTNL for daytime is LAeq, daytime 60dB and compliance against this level is reported.</p>	EPA	<p>Section 5 of the Amended Noise Impact Assessment (Appendix C) has been updated to correct the typographical error, now reading "Leq(15h) 60 dB(A)" instead of "65 dB(A)", with compliance achieved by 2 dB(A).</p> <p>It is highlighted in the Noise Impact Assessment Addendum (Appendix D) that the assessed noise level of 58 dB(A) is conservative as it represents the maximum 15-minute averaged noise level recorded, compared to the Vessel Target Noise Level which is a 15-hour averaged noise level. In particular, noting that the measured noise level is unlikely to be consistently at this maximum level during the entire 15-hour period (as supported by ERM's measurements of vessel noise) the Leq(15-hour) noise assessment levels from the vessels are likely to be lower than the maximum measured Leq(15-min) value due to time-averaging.</p> <p>The Amended Noise Impact Assessment provides detailed consideration of the GIWBPNP, and indicates that application of the GIWBPNP will ultimately lead to compliance with the Vessel Target Noise Level for ships servicing Cement Australia.</p>

Matter raised	Agency	Response
The process to assign landside trigger levels to individual users at the port has not been completed. As a practical way forward, the EPA suggests that Cement Australia be assigned landside trigger noise levels based on the cumulative limit (i.e. NPfl - urban industrial interface amenity noise levels) minus 10dB as a conservative interim assessment approach. The predicted landside noise levels in the NIA (Table 6-2) suggest that these conservative levels could be closely approached with a negligible 1dB exceedance identified at night at Batty Street Balmain.	EPA	<p>In accordance with the EPA's recommendation, the following landside trigger levels have been included in Section 6 of the Amended NIA:</p> <ul style="list-style-type: none"> • Day – 55 dB(A) $L_{eq,11h}$ • Evening – 45 dB(A) $L_{eq,4h}$ • Night – 40 dB(A) $L_{eq,9h}$ <p>As identified by the EPA, a 1 dB exceedance is predicted for the night period at Batty Street, Balmain and that this exceedance is considered to be negligible as it would not be discernible by the average listener.</p>
The NIA indicates at section 6.2 that: “The difference between the day/evening and night-time noise contours is the truck movements which are at a lower frequency in the night-time period”. However, the night-time contours in Figure 6.2 are higher than the daytime levels in Figure 6.1. Additionally, the contours indicate higher noise levels than the levels reported in Table 6.2. This anomaly needs to be explained and justified.	EPA	ERM acknowledge a graphics error in the noise contour figures. The model has been re-run and checked, with a revised noise contour figures are provided in Figure 6.3 (day/evening) and Figure 6.2 (night) of the Amended NIA.
<p>Section 6.1.3 of the NIA indicates that: “The SWL [sound power level] for facility mechanical equipment were based on representative data from ERM’s database”. A single sound power level has been presented in Table 6.1 for “Facility Mechanical Equipment”.</p> <p>Given that the facility is existing and no changes to mechanical plant are proposed, the sound power levels used in the assessment should be based on measurement of the existing plant and equipment. Significant noise sources should be identified through site surveys, and the location, height and sound power level established, reported and used in the noise model.</p>	EPA	<p>ERM visited the Cement Australia Glebe Island Silos site on the 1st of November 2022 to conduct sound pressure level measurements of mechanical equipment noise. The full measurement details are provided in Appendix B of the NIA Addendum and have been incorporated into the Amended NIA at Section 6.1.3.</p> <p>The facility mechanical equipment is fully enclosed, and the noise breakout is through the louvres from the blowers located at the silos.</p> <p>The noise measurements indicate that current noise levels of the blowers at the site are lower than the assumed SWL for facility mechanical equipment in the submitted NIA.</p> <p>As the main noise contributor at the facility are truck movements, updating the SWL for facility mechanical equipment would result in no changes to the predicted noise impact of the throughput capacity increase.</p>
Section 6.1.3 of the NIA also indicates that: “Night-time measurements were used for calibration purposes as they were less influenced by noise sources unrelated to port activities”, however no further details are provided about model calibration or validation. Details of model validation and calibration should be provided	EPA	Section 6.1.3 of the Amended NIA has been modified to remove this sentence, and to provide additional details of model calibration and verification. The dominant noise sources and associated Sound Power Levels assumed in the model for the landside noise assessment remain as indicated in Table 6.1 of the NIA.
Table 6.1 of the NIA indicates that trucks were modelled using a line source. Additional detail is required for example assumed speed profile through the site, source height etc	EPA	<p>Additional information is provided in the Amended NIA with regard to the truck movements modelled in Table 6.1 in the NIA, as follows :</p> <ul style="list-style-type: none"> • A constant movement speed of 20 km/h was assumed. • The line source was at an emission height of 2.5m relative to the ground.

Matter raised	Agency	Response
<p>The NIA reports at Section 6.1.2 that the ISO9613 model has been used and further that: "Typical noise enhancing night-time meteorological conditions were modelled (Temperature 10°C, Humidity 90%, no wind). Neutral meteorology settings were used in the model, with the harbour 100% acoustically reflective and the surrounding land areas 50% acoustically reflective to represent a conservative modelling output". EPA notes that the ISO9613-2:1996 standard states the model is based on source to receiver windspeeds between 1-5m/s or a well-developed ground based temperature inversion. Additional clarification / explanation of the commentary in the NIA as to whether the model has considered noise enhancing or "neutral" conditions while implementing the ISO9613 algorithms is required.</p>	EPA	ERM has reviewed the modelling parameters and confirms that the model has considered noise-enhancing downwind conditions as implemented using the ISO9613 algorithms on CadnaA noise modelling software – as specified in Section 6.1.2 of the Amended NIA.
<p>Cumulative impacts from the increased throughput and existing operations are reported in section 6.3 of the NIA. However, only the activities of Hanson Concrete and the increase throughput of the Cement Australia have been considered. Other noise sources such as Gypsum Australia, White Bay Cruise Terminal and the construction of the Metro West etc have not been considered in the cumulative assessment. While the recommendation for the use of a conservative assessment approach under item iii above attempts to address the lack of information about existing landside activities and noise levels, the SEARs require a cumulative assessment.</p> <p>A cumulative noise impact assessment that includes impacts from existing onsite operations within Glebe Island White Bay and from surrounding developments should be undertaken as required by the SEARs.</p>	EPA	A revised cumulative noise assessment is provided in Appendix B of the NIA Addendum and Section 6.3 of the Amended NIA, considering Sydney Metro West Construction, and the operation of the White Bay Cruise Terminal and the Gypsum Terminal.
<p>While section 6.4 of the NIA suggests that maximum noise events associated with truck movements are predicted to satisfy screening noise levels presented in the assessment, vehicle movements on the site will need to be carefully and effectively managed with both operational controls and management supervision.</p> <p>DPE may wish to require through any planning approval a heavy vehicle noise management plan to ensure that maximum noise events are effectively controlled and managed through measures including driver training and behaviour, speed limits, road surface etc.</p>	EPA	Noted. Cement Australia would accept a condition of consent that requires a Heavy Vehicle Noise Management Plan to control and manage maximum noise level events.
<p>Section 6.1 of the Noise Impact Assessment (NIA) indicates the incremental noise impacts of the development have been combined with the findings of the NIA prepared by SLR Consulting Pty Ltd in 2018 for the Hanson development to determine landside cumulative noise impacts of the development. However, it is not clear the extent of noise sources which have been included in the cumulative assessment. The Department requests confirmation on the noise sources considered in the cumulative noise impact assessment.</p>	DPE	The cumulative noise assessment has been revised as outlined above and is provided in Appendix B of the NIA Addendum and Section 6.3 of the Amended NIA.

Matter raised	Agency	Response
Section 5.1 of the NIA states the Applicant has limited control over the noise emissions from vessels. The Department's general expectation is for all vehicles involved in the operations of the development to be the responsibility of the Applicant to maintain and manage. Therefore, the Department requests clarification on why the Applicant's capacity to control noise emissions from vessels is limited.	DPE	<p>It is acknowledged that the Applicant has some influence over the vessels that service its facility. However, third party operated vessels can generally only be mandated to comply with the broader legislative requirements established at a state-wide or national level. This is consistent with the approach to managing motor vehicles. Any requirement to achieve higher environmental standards represents a significant restraint of trade on these otherwise legal vessels and should be considered as part of a broader strategy to improve environmental standards of vessels rather than restricting the use a particular vessel in the service of one particular facility.</p> <p>In this context, for Glebe Island and White Bay the Port Authority has implemented the GIWBNP, which includes the Vessel Noise Guideline that seeks to ensure noise from all vessels using Glebe Island and White Bay is acceptable. However, the possibility of vessels emitting higher noise levels than what has been predicted (or historically measured) still exists due to the mechanical nature of the noise sources.</p> <p>To address this risk, the Port Authority conducts regular noise monitoring in accordance with the GIWBNP and has prepared a Vessel Noise Operating Protocol to be followed in the event a vessel does not comply with the specific vessel noise levels. This framework will ensure that vessel noise limits are adhered to, or inform a process to establish mitigation measures to ensure compliance with the established vessel noise limits over time for each vessel.</p>

4.1.2 Issues Raised in Public Submissions

Acoustic impacts were raised in 78% of public submissions. Submissions included the following considerations:

- Operational noise impacts from loading and ship and truck movement;
- Installation of noise attenuation measures;
- Sleep disruption;
- Requirement to install noise attenuation measures;
- Curfew on noise limits; and
- Appropriateness of the Port Noise Policy.

Table 3 *Public submissions noise issues summary and responses*

Matter raised	Response
Operational noise impacts and increased noise pollution from ship unloading / loading, ship movement,	<p>It is noted that the proposal relates only to the intensification of the existing use, which will not result in an increase of noise volume from any particular activity, however will generally increase the periods of time when noise is being generated. The exhibited NIA assessed noise from ships, trucks, and operational activities associated with handling cement, and considered sleep disturbance noise and additional generated traffic on the surrounding road network.</p> <p>The exhibited NIA had the following conclusions:</p> <ul style="list-style-type: none"> • Ship noise: Noise would comply with day, night and sleep disturbance criteria in the Port Noise Policy;

Matter raised	Response
truck movement	<ul style="list-style-type: none"> Truck noise: anticipated truck noise are more than 10 dBA lower than the Collective Benchmark Noise Level during day, evening and night time periods at all sensitive receptors; Sleep disturbance: refer below; Traffic: A night time traffic flow (10pm-7am) has been modelled for an additional 54 heavy vehicle movements during this period. This results in a night time traffic noise increase of approximately 0.8 dBA which does not exceed the Road Noise Policy criteria of a 2 dBA increase. <p>The above assessment was subject to the following mitigation measures being proposed, which can be established within an operational management plan for the facility:</p> <ul style="list-style-type: none"> Ensure plant and equipment is well maintained and not generating excessive noise; Operate machinery in a manner which reduces maximum noise level events; Site awareness training / environmental inductions that include a section on noise mitigation techniques / measures to be implemented when ship unloading operations are occurring; and Operation of a community complaints management program, including complaints hotline and response management procedure.
Sleep disruption	<p>Sleep disturbance noise levels were assessed as part of the exhibited EIS and the relevant noise level for further evaluation in relation to sleep disturbance is an LMAX of 65 dBA.</p> <p>Short term peak noise levels are expected from onsite truck movements which will cause maximum noise levels. Potential noise emissions include air brake release and/or high engine revving (low gear).</p> <p>To assess the potential for sleep disturbance, a 115 dBA SWL noise source representative of an air brake release was positioned at the closest points of the onsite vehicle route to the residences in Balmain, located approximately 300 metres away with direct line of sight. This maximum impact noise model predicted an impact of up to 53 dBA Lmax at the closest receptors.</p> <p>This is 12 dba Lmax below both the Port Authority's screening limit at all sensitive receptors as well as the reference level for further evaluation. Therefore, the proposal is not considered to cause adverse impacts in relation to sleep disruption.</p>
Cumulative impact of noise emissions from the site and surrounds, including from Anzac Bridge	<p>An assessment of the additional generation of trucks on the broader road network has been undertaken, which is anticipated to be an additional 144 movements per day. A night time traffic flow (10pm-7am) has been modelled for an additional 54 heavy vehicle movements during this period. This results in a night time traffic noise increase of approximately 0.8 dBA which does not exceed the Road Noise Policy criteria of 2 dBA increase.</p>
Requirement to install noise attenuation measures	<p>The installation of noise attenuation measures on shipping as outlined in the original NIA can be imposed as a condition of consent.</p>
Curfew on noise limits	<p>Refer to above discussion in relation to hours of operation. The continuation of the existing 24 hour, 7 days a week operation is proposed, noting that the noise from the proposal meets all applicable criteria.</p>
Appropriateness of the Port Noise Policy	<p>The Port Authority of NSW has developed a Port Noise Policy and Vessel Noise Operating Protocol to manage noise proactively, consistently and fairly across port operations in Glebe Island and White Bay. The Policy recognises the location of port facilities close to residential areas and aims to provide certainty about noise management for the community, port users and other stakeholders. It is considered to be the most appropriate noise policy criterion which has been developed specifically for the requirements of the Glebe Island and White Bay area.</p>

4.2 Air Quality

4.2.1 Issues raised in Agency Submissions

The EPA raised one matter in relation to air quality, where they considered that the SEARs had been adequately addressed.

Table 4 Agency air quality issues and responses

Matter raised	Agency	Response
Whilst no dispersion modelling was conducted (i.e. semi-quantitative approach was undertaken), EPA acknowledges that the SEARs has been adequately addressed.	EPA	No further input / changes to air impact assessment required.

4.2.2 Issues Raised in Public Submissions

Acoustic impacts were raised in 70% of public submissions. Submissions generally raised the issue of air quality, with one submission specifically querying the accuracy of the assessment and identifying an increase in nitrogen oxide and sulphur dioxide.

Table 5 Public submissions air quality issues summary and responses

Matter raised	Response
General concerns in relation to air pollution	<p>Generally, the assessment demonstrates that the potential increases in emissions from the increase in throughput are estimated to be minor and are unlikely to lead to any measurable impacts on local air quality or any additional exceedances to air quality criteria (in the case of 24-hour PM10 and PM2.5).</p> <p>The increased throughput is unlikely to lead to any air quality impacts and additional mitigation measures are not proposed. It is highlighted that the pneumatic transfer of all cementitious material will be continued, ensuring that particulate emissions to the atmosphere from this activity will remain at almost zero.</p>
Increase in NOx & SO2 emissions due to the doubling of the time at berth without shore power infrastructure.	<p>An Air Quality Assessment was prepared by ERM Australia and was exhibited. Given the proposal does not involve new development, but rather an increase in existing operations, and that the operational activities currently do not have a significant impact on local air quality, a semi-quantitative air quality assessment was conducted.</p> <p>Nitrogen Oxide</p> <p>All background concentrations of NO2 were found to be well below the EPA impact assessment criteria of 62 µg/m3 for the annual average and 246 µg/m3 for the 1-hour average. It is highlighted that the low background concentrations include the current shipping operations.</p> <p>The increase of existing NOx emissions are unlikely to cause any measurable difference to ground level concentrations at nearby sensitive receptors. This is because the nearby road network and associated vehicle emissions will be a much larger source of NOx than ships berthing at various times throughout the year.</p>

Matter raised	Response
	<p>estimated increases arising specifically from the proposal are comparatively small, and are unlikely to make a measurable difference to ground level concentrations at nearby sensitive receptors.</p> <p>Sulfur Dioxide Existing concentrations of SO₂ are well below the EPA impact assessment criterion for all averaging periods. The current levels measured at White Bay represent only a fraction of the air quality criteria, and would already include emissions from existing shipping in Glebe Island. Estimated increases arising specifically from the proposal are comparatively small and are unlikely to make a measurable difference to ground level concentrations at nearby sensitive receptors.</p>

4.3 Traffic and transport

4.3.1 Issues Raised in Agency Submissions

Traffic impacts were raised by TfNSW, DPE and Inner West Council. Submissions included the following considerations:

- Calibration and layout used in the traffic model;
- Recency of traffic surveys;
- Clarification of traffic movements; and
- Requirement for a traffic management plan.

Traffix have prepared a traffic assessment addendum which accompanies this RtS in **Appendix C** which addresses the traffic matters raised by agencies. A summary of Traffix's response has been provided below.

Table 6 Agency traffic issues and responses

Matter raised	Agency	Response
TfNSW recommends the below matters be addressed through an addendum to the TIA, and include an electronic copy of the SIDRA files for the agency's review and verification.	TfNSW	Noted. Electronic SIDRA modelling files have been provided under separate cover.
The City West Link and Victoria Road are major arterial roads, which carries a high volume of traffic and delay and queues have been observed to be excessive at times.	TfNSW	Noted. New infrastructure projects including the WestConnex and Western Harbour Tunnel are anticipated to redistribute traffic patterns in the area and reduce traffic on the City West Link and Victoria Road, and significantly improving the performances of associated intersections. The Rozelle Interchange is due to be completed in 2024.
The setup parameters in the base model are not in accordance with the SCATS data, for example the cycle length should be 140 seconds. The Applicant can obtain further information can be obtained regarding key input parameters by email to development.sydney@transport.nsw.gov.au.	TfNSW	<p>The SIDRA 9 model utilised the existing AECOM model for the Hanson Construction Materials Pty Ltd Concrete Batching Plant at Glebe Island. This model has been approved by both Council and TfNSW.</p> <p>The base model for the proposed development included the following:</p>

Matter raised	Agency	Response
The model is predominantly using defaults, where some examples include not using actual lane widths, grades, pedestrian walk and clearance times, minimum times are too short, no pedestrian volumes, or consideration of the Peak Flow Factor and an absence of Late Start time settings.	TfNSW	<ul style="list-style-type: none"> The surveys conducted in 2017 prior to COVID-19 restrictions and were undertaken during a typical Thursday between 7:00am to 9:00am and 4:00pm to 6:00pm. These surveys are considered applicable given that the permanent TfNSW counter on the Western Distributor (Anzac Bridge, Station ID: 20001) identified comparable traffic volumes with 136,837 vehicles in 2017, 135,860 vehicles in 2018 and 136,756 vehicles in 2019; The road layout of the model was updated and based on the road layout at the time, noting that these key intersections are subject to layout changes due to ongoing construction of the WestConnex M4-M5 Link Rozelle Interchange; and The traffic volumes of the Hanson Concrete Batching Plant were incorporated within the 'base case' scenario SIDRA 9 model for the proposed development. <p>With the above in mind, the SIDRA 9 model prepared for the proposed development was based on the model prepared by AECOM and updated based on the road layout at the time. Accordingly, recalibration of the model is not considered necessary, given that TfNSW has already utilised it for a previous assessment and subsequent approval.</p> <p>In addition to the above, it should be emphasised that the proposed throughput capacity increase for the Glebe Island Silos would result in minimal additional traffic volumes, and minor net increases in average intersection delay. As such, the surrounding key intersections are able to accommodate the maximum trip generation associated with the proposed development, regardless of any proposed uplift in capacity.</p> <p>Further, new infrastructure projects including the WestConnex and Western Harbour Tunnel are anticipated to significantly improve the performances of these intersections, with future traffic volumes envisaged to be distributed onto the WCX and WHT upon completion. Accordingly, the surrounding road network would readily be able to accommodate the traffic generation of the proposed development into the future.</p> <p>New infrastructure projects including the WestConnex and Western Harbour Tunnel are anticipated to redistribute traffic patterns in the area and reduce traffic on the City West Link, significantly improving the performances of these intersections. In particular, future traffic volumes and trucks operating on the site would be envisaged to be distributed onto the WestConnex upon completion in 2024, and the Western Harbour Tunnel in the longer term.</p>
A defined route has been set for offset calculations for the AM existing model only. This should be included for all models in the appropriate direction of coordination.	TfNSW	
Cycle times should be 140 seconds which predominantly occurs during the peak periods. The applicant has an 'optimised' setting of 85 second cycle length in the PM and 145 seconds for the AM, where both are non-typical.	TfNSW	
The left turn from The Crescent has been omitted from B phase at City West / The Crescent intersection.	TfNSW	
TfNSW has also noted that the effective left turn storage length into James Craig is less than what is coded. The development's large vehicles are to be setup with the correct vehicle length and queue space. Further consideration should be given to lowering the intersection approach truck speeds.	TfNSW	
The calibration of the base model must be undertaken, and the methodology and difference between observed and calculated data is to be tabulated in a supplementary report. This is to ensure that all intersections are being modelled accurately. The calibration method is to follow that described in the SIDRA User Guide Section 2.6.2 – 2.6.4 in conjunction with TfNSW's Guide to Traffic Modelling.'	TfNSW	

Matter raised	Agency	Response
Table 3 in Section 8.1 of the TIA notes the development would incur an additional 8 vehicle movements during the AM peak period and 5 vehicles movements during the PM peak period. However, the TIA also notes the development has an operational capacity of 12 trucks per hour. The Department requests clarification on the maximum vehicle movements of the site per hour.	DPE	<p>In order to determine the traffic generation of the proposal, the vehicle distribution profile of the existing development was utilised. Based on the 95th percentile demand level, the traffic generation of the proposal was anticipated to be:</p> <ul style="list-style-type: none"> • 8 vehicles per hour during the morning peak period; and • 5 vehicles per hour during the evening peak period. <p>This anticipated traffic generation would equate to a single additional vehicle every 7-12 minutes, which is considered minor and would have minimal impacts to the surrounding road network.</p> <p>However, it is also noted that the facility has a maximum truck throughput of 12 truck arrivals per hour (or 24 vehicle movements per hour) due to weighbridge constraints. Modelling of this possible 'worst case' scenario indicates that it would result in minor increases in average intersection delay.</p> <p>As such, the surrounding road network is readily able to accommodate the potential maximum volume of the existing weighbridges, regardless of any proposed uplift in capacity.</p>
The Department notes the increase in throughput capacity would result in an increase in vehicle movement distribution throughout the day. The Department requests more information on the distribution of vehicles throughout the day.	DPE	<p>With regard to the vehicle distribution throughout the day the following has been confirmed by the client for the current operations:</p> <ul style="list-style-type: none"> • 1% of the one-hour intervals have the maximum 12 truck deliveries; • 12% of the one-hour intervals exceed eight (8) truck deliveries • 90% of the above peak 1-hour periods (i.e. more than 8 trucks in an hour) occur between 7:00am and 4:00pm • The period between 7:00am and 4:00pm accounts for 60% of truck movements <p>The proposed development will result in the following changes to the above distributions:</p> <ul style="list-style-type: none"> • 2% of the one-hour intervals would have the maximum 12 truck deliveries; (+1%) • 24% of the one-hour intervals would be anticipated to exceed eight (8) truck deliveries; (+12%) • 90% of these peak 1-hour periods are still expected to occur between 7:00am and 4:00pm (no change); and, • The 9-hour period between 7:00am and 4:00pm is still expected to account for 60% of truck movements (no change). <p>Any increase in traffic volumes throughout the day as a result of the proposal is envisaged to have minor impacts, given the reduced traffic volumes within the surrounding road network outside the morning and evening peak periods. Further, there is significant capacity within the daytime period to accommodate increased truck movements whilst operating within the maximum 12-trucks per hour cap.</p>

Matter raised	Agency	Response
Truck haulage routes indicate access to and from the development proposed remain unchanged, that is, through James Craig Road and City West Link Road. The 'Glebe Island Traffic Management Map' in Appendix E of the TIA also provides alternate routes that appear to link to the White Bay Cruise Terminal and/or Robert Street. Under no circumstances truck access through Glebe Island's internal roads exiting onto Robert Street will be supported.	Inner West Council	The truck haulage routes are proposed to remain unchanged, being entry and egress onto James Craig Road via Sommerville Road. It is understood that no truck haulage movements are permitted to or from Robert Street.
The SIDRA analysis appear to have incorporated the additional generation anticipated from Multi-use facility, White Bay Cruise Terminal, New Sydney Fish market, and Hanson Concrete Batch Plant. Although these are included in the assessment, impacts from the construction and operational stages of the WestConnex Rozelle Interchange does not appear to have been included in the 2017 survey and traffic modelling as WestConnex construction commenced in 2019.	Inner West Council	<p>The proposal involves an anticipated traffic generation of eight (8) vehicles and five (5) vehicles per hour during the morning and evening peak periods, respectively. These traffic volumes represent an additional single vehicle every 7-12 minutes, which is considered minor.</p> <p>The ongoing construction of the WestConnex Rozelle Interchange is envisaged to generate moderate construction vehicle traffic volumes, however it is emphasised that these vehicle movements pertain to construction activities (i.e. temporary) and upon completion, would not adversely impact the ongoing operations of the proposed development.</p>
Intersection modelling on three (3) intersections have been provided in the TIA report. The SIDRA modelling layout appears to be based on the existing layout at the time of the report, and not reflecting on the final layout when Rozelle Interchange will be complete. It is noted that the modelling has not included a Saturday midday peak as originally suggested in Council's earlier comments.	Inner West Council	Given the minor increase in traffic, which is within the fluctuations of background traffic flows, updating the SIDRA model to include the Saturday midday and new road layout is considered unnecessary and onerous, noting also that the road layout is continually changing due to ongoing construction of the WestConnex. The Rozelle Interchange is due to be completed in 2024 and will redistribute traffic patterns in the area and reduce traffic on the City West Link, significantly improving the performance of intersections in the medium and longer term.
<p>A Traffic Management Plan for the Glebe Island Terminal does not appear to address the items raised previously by Council, such as:</p> <ul style="list-style-type: none"> • Reinstatement of Glebe Island Bridge for active and public transport • Establishment of Bays Precinct, Sydney: The Transformation Strategy proposed foreshore public access area • Development of future light rail links to White Bay 	Inner West Council	<p>In relation to Council's request to include active and public transport for the Glebe Island Terminal, this item is considered onerous and unnecessary noting that the development is highly automated and involves no increase to the existing three (3) staff numbers. Users to the site are mainly trucks with loading and unloading conducted wholly within the site.</p> <p>It is also noted that the Glebe Island Bridge is not under the control of Cement Australia, and is outside Cement Australia's lease area. As such, Cement Australia has no ability to influence access to or the use of the Glebe Island Bridge, and it is considered beyond the scope of this assessment. The establishment of foreshore areas and future light rail links are similarly beyond the power of Cement Australia and outside of the scope of the development application.</p>

4.3.2 Issues Raised in Public Submissions

Traffic impacts were raised in 42% of public submissions. Submissions generally raised the issue of additional traffic congestion, however also included the following considerations:

- Increase in traffic generation near the site and around Greater Sydney;
- Traffic impacts on safety on the walking and cycling network; and
- Historical data utilised in the traffic model.

Table 7 *Public submissions traffic issues summary and response*

Matter raised	Response
Increase in traffic congestion near the site and in Greater Sydney	<p>This anticipated traffic generation would equate to a single additional vehicle every 7-12 minutes, which is considered minor and would have minimal impacts to the surrounding road network.</p> <p>The traffic assessment accompanying the existing application indicates that existing intersections already occurs at a A or B Level of Service (LoS), with the proposal not changing the intersection performance of these intersections.</p> <p>New infrastructure projects including the WestConnex and Western Harbour Tunnel are anticipated to redistribute traffic patterns in the area and reduce traffic on the City West Link, significantly improving the performances of these intersections. In particular, future traffic volumes and trucks operating on the site would be envisaged to be distributed onto the WestConnex upon completion in 2024, and the Western Harbour Tunnel in the longer term.</p> <p>Accordingly, the future surrounding road network would readily be able to accommodate the traffic generation of the proposed development.</p>
Traffic impacts on walking and cycling network	<p>The proposal does not involve any physical works and will not result in changes to the local walking and cycling network outside of the site. As referenced above, the proposal does not change the existing intersection performance of surrounding intersections.</p>
Traffic modelling utilising historical data	<p>While it is noted that the traffic surveys were conducted in 2017, these surveys were conducted prior to COVID-19 restrictions and were undertaken during a typical Thursday between 7:00am to 9:00am and 4:00pm to 6:00pm.</p> <p>These surveys are considered comparable to existing traffic numbers given that the TfNSW counter on the Anzac Bridge identified comparable traffic volumes with 136,837 vehicles in 2017, 135,860 vehicles in 2018 and 136,756 vehicles in 2019.</p> <p>As above, the completion of WestConnex and Western Harbour Tunnel will improve the performance of roads and intersections in the surrounding area and the proposed number of additional trucks during peak periods resulting from the increased throughput is considered negligible.</p>

4.4 Heritage

One comment raised in the submissions related to heritage, raised by the Heritage Council of NSW.

Table 8 Agency heritage issues summary and responses

Matter raised	Agency	Comment
The Heritage Council of NSW acknowledges that there will be no physical works done and that there are no known historical archaeological 'relics' within the proposal. They have recommended the following condition be included on the Development Application: Unexpected Finds The Applicant must ensure that if any unexpected archaeological deposits or relics not identified and considered in the supporting documents for this approval are discovered, work must cease in the affected area(s) and the Heritage Council of NSW must be notified as required by s146 of the Heritage Act 1977.	Heritage Council of NSW	The proposal does not involve physical works. The recommended condition may be included in the conditions of consent.

4.5 Other matters raised

4.5.1 Matters raised in Agency Submissions (DPE)

DPE raised further matters in relation to the following:

- Further detail to be provided on the consideration of alternatives;
- Clarification on future changes to the facility noting the gradual transformation of the Bays Precinct; and
- Further detail on the description of the development and proposed operations.

A response is provided to each matter raised below.

Table 9 Agency other issues and responses

Matter raised	Comment	Response
Consideration of Alternatives	The Department notes the strategic need for the development proposal identified in Section 1.4 of the EIS is to increase throughput capacity of the site in response to trending growth of Gross Domestic Product (GDP) demand. Particularly, the EIS states the proposed throughput capacity of 1.2 million tonnes per annum would be reached by 2035 at a GDP growth rate of 5%. The Department requests further information including data and analysis to demonstrate the trending growth of GDP for cementitious material.	It is anticipated that demand will result in a continual increase for cementitious material to be handled by the facility in the coming years consistent with ongoing an increasing construction activities throughout Sydney. The demand for cementitious material is estimated to increase at an average rate of 5% per annum. Although, it is highlighted that this forecast is an annual average only and prone to fluctuations in the economic cycle. It is also highlighted that the Cement Australia facility only operates to meet demand. The silos have a limited storage capacity – such that, if demand recedes, Cement Australia manages its supply chain to reduce deliveries.

Matter raised	Comment	Response
Consideration of Alternatives	Further to the above, the Department seeks clarity on any proposed staging of the site's throughput capacity until cementitious material demand is met in 2035 or if the site will operate at maximum capacity regardless of demand.	<p>As such, the facility will not operate at the full capacity sought until demand reaches that level. Rather the application seeks approval for an operational capacity limit then enables Cement Australia to respond to the demand fluctuations that are inevitable in the coming years.</p> <p>Future operations and increases in the throughput of cementitious material by the facility will not be staged, as activity is highly dependent on construction demand and is prone to fluctuation. Historical trends indicate a combination of demand surges and plateaus reflecting fluctuations in the economic cycle, which Cement Australia is seeking to adapt to.</p>
Consideration of Alternatives	<p>Section 1.4 of the EIS identifies the site currently distributes approximately 50% of Sydney Metropolitan's cementitious material for construction projects. It is noted in the EIS that several of the construction project sites supplied by the development are located within Greater Western Sydney. The Department notes key issues raised in the public submissions relate to the suitability of the development for the site and the broader locality due to the location of construction projects throughout the Sydney Metropolitan area.</p> <p>The Department requests further information on the proportion of cementitious material distribution between the different regions of the Sydney Metropolitan and further justification the site is suitable for the proposed development.</p>	<p>Cement Australia have provided traffic numbers for the destination of cement trucks for September 2022. The truck destination data concludes that:</p> <ul style="list-style-type: none"> • 52% of destinations are within 15km of Glebe Island within the inner city; • A further 16% of destinations are to destinations to the north of Sydney, more than 15km away from Glebe Island. <p>Section 1.4 of the EIS notes that alternative options are for the use of facilities in Port Kembla and Newcastle. Given the growth of Greater Sydney including Western Sydney, selecting an alternative option for increased concrete throughput outside of the Sydney Metropolitan Area would not be appropriate as it would require trucks to travel excessive distances to travel to construction sites.</p> <p>Newcastle is not considered an appropriate location to service sites in Greater Sydney.</p> <p>It is noted that Port Kembla may be capable of servicing sites in the Macarthur region and Sutherland Shire regions of Sydney via Picton Road and the Princes Highway respectively. However, these truck haulage routes are not currently considered optimal for the following reasons:</p> <ul style="list-style-type: none"> • Trucks travelling north towards to Picton Road and the Sutherland Shire are required to navigate the steep grades of the Princes Highway through Mt Ousley; and • Picton Road and portions of the Princes Highway north of Waterfall are not grade separated highways. In the case of Princes Highway, the road runs through suburban Sydney with frequent starting and stopping for trucks. <p>As the Glebe Island site is well connected to neighbouring grade separated motorways in WestConnex, the M4/M8/M5 and the Western Distributor with direct access to Sydney's orbital motorway road network, the site's good connection to nearby motorways with minimal constraints is appropriate to service sites throughout the Greater Sydney region, including many sites that are located in Sydney's south and south west.</p>

Matter raised	Comment	Response
Future changes to the facility	Section 3.3 of the EIS stipulates the site would likely be 'refined' in the future to enable the site to co-exist with changing land uses within the Bays Precinct over the next 10-15 years. The Department seeks clarification on potential refinements to facility noting the re-development of the Bays Precinct over the next 10-15 years coincides with the site reaching GDP demand between 2035-2040.	<p>The site is leased to Cement Australia and is owned by the Port Authority of NSW. This application does not seek any refinements to the facility, however notes that discussions between Cement Australia and the Port Authority of NSW are ongoing to determine the optimal response to enabling the ongoing functional capacity of the Glebe Island and White Bay Port in the context of the transition towards a more mixed use precinct, as envisaged under the Bays West Place Strategy, and the recently completed Bays West Stage 1 Master Plan and Urban Design Framework, both of which include a land use and function direction to "retain, manage and allow the essential strategic port and maritime industry uses to grow and evolve".</p> <p>In this context, the future evolution of the Cement Australia facility will necessarily be informed by the outcome of the detailed master planning for the Glebe Island Silos sub-precinct as well as the Port Authority of NSW's 'Port Innovation and Integration Plan'.</p> <p>This assessment of this current development application does not need to be delayed for these studies to be complete, because the Port Authority of NSW is the landowner and can require facility improvements through its leasing arrangements with Cement Australia. If any upgrades or improvements require planning approval, then Cement Australia will make the appropriate application at the appropriate time. This process is far more flexible, which is important given that the timeframes associated with renewal of the Glebe Islands Silos sub-precinct is currently uncertain.</p>
Project Description	Section 3.2 of the EIS states the average port time for vessels would increase from approximately 36 hours to 48 hours per shipment. The Department requests clarification on if shipment unloading is a continuous and uninterrupted activity for the total proposed 48-hour period. The Department notes the requirement of a respite period for unloading activities during night-time periods was a key item raised in the public submissions. The Department requests the Applicant to consider the implementation of respite periods during shipment unloading activities and detail any potential impacts to operations such as the amount of days ships are at berth per year.	<p>Once commenced ship unloading occurs continuously and uninterrupted for the duration of the unloading period.</p> <p>Respite periods would significantly lengthen the amount of time ships were required to be at berth. Given that the ship unloading activity is a current activity that is currently carried out during the night time period, and has done since at least 1991, it is considered reasonable for the activity to continue on the same 24-hour basis.</p>
Project Description	Section 3.2 of the EIS identifies some shipments of cementitious material are anticipated to come in from overseas. The Department requests confirmation that overseas shipments have been considered in the proposed total 55 vessels per year. In addition, the Department seeks clarification on if overseas shipments will include different types of vessels and different berthing timeframes.	The figure of 55 vessels is based on average target payload numbers. It is not expected to change substantially whether the vessels are domestic or international in origin. Whilst specific vessels may vary (for both the domestic and international vessels), the target payload and overall berthing times are not expected to vary substantially between vessels.

Matter raised	Comment	Response
Project Description	The Department notes the remaining 14 silos of the Glebe Island Silos Facility are currently operated by Sugar Australia Pty Ltd (Sugar Australia). However, it is not clear that Sugar Australia's operations have been considered in the cumulative impact assessments of the EIS such as the Traffic Impact Assessment and Noise Impact Assessment. The Department seeks clarification that Sugar Australia's operations of the remaining 14 silos of the Glebe Island Silos Facility have been considered in cumulative impact assessments of the supporting technical studies of the EIS.	<p>The existing Cement Australia operations have been conducted side-by-side with Sugar Australia for over 25 years.</p> <p>The Traffic Impact and Noise Impact Assessments forming part of the exhibited application consider existing traffic and existing background noise from all existing port related activities and operations, including Sugar Australia. These assessments therefore account for the operations of Sugar Australia.</p>

4.5.2 Other matters raised (Public submissions)

Other matters were raised by members of the public. These included:

- Concern on the cumulative impacts of the proposal (particularly in relation to noise, traffic and air quality) when considering the impacts of other port activities and nearby roadworks;
- Lighting from the facility and its impact on residential areas of Balmain and Rozelle;
- Safety of marine vessels;
- Future use of the Bays Precinct;
- Water quality;
- Odour impacts;
- Possibility of imposing a time limit on any approval; and
- Commercial advantage over the Hanson Concrete Batching Plant.

It is noted that 10 submissions related to cumulative impacts and 17 related to lighting impacts from the port, wharf and shipping. However, the matters raised were general in nature and a response to these matters has been provided below.

Table 10 *Public submissions other issues and responses*

Matter raised	Response
A number of submissions raised concern on the cumulative impacts of the proposal in relation to noise, traffic and air quality (10 submissions)	<p>The exhibited EIS and supplementary documentation provided in this Response to Submissions Report contain a thorough cumulative assessment of the following:</p> <ul style="list-style-type: none"> • Air quality; • Noise • Traffic and Transport • Marine Traffic and Safety <p>These assessments include the assessment of background or existing conditions, which accounts for existing facilities and current activities throughout and around the port and ensuring that the impacts of the proposed increased capacity of the Cement Australia facility have been considered cumulatively.</p> <p>In relation to traffic it is highlighted that the peak number of trucks in any 1-hour period will not increase – it is currently 12 trucks per hour, and will continue to be 12 trucks per hour into the future. As set out in the Transport Management and Accessibility Plan submitted as part of the Bays West</p>

Matter raised	Response
	<p>Stage 1 Master Plan, it is part of the implementation of Bays West Stage 1 that the current maritime uses at Glebe Island are accommodated and supported. The Transport Management and Accessibility Plan also identifies that the total bidirectional heavy vehicle traffic on Sommerville Road is 240 trucks during the peak hour when a cruise ship is loading at White Bay Berth No. 5, and 120 on a non-cruise ship day. Up to 24 of these heavy vehicle movements (12-in, 12-out) are for Cement Australia. Port Authority of NSW is currently undertaking a Ports Integration and Innovation Plan, which seeks to understand how existing and ongoing port-related uses (including Cement Australia) uses can be integrated with future development plans of Bays West, noting that the opening of the WestConnex Rozelle Interchange in 2024 will redistribute traffic patterns in the area and reduce traffic on the City West Link.</p> <p>In relation to noise impacts, it is noted that the proposed development will be operated by Cement Australia under a lease agreement with the Port Authority of NSW and that Port Authority will undertake a 'precinct-based' approach to monitoring and managing noise associated with the precinct's operation. This approach is outlined within the exhibited EIS.</p>
<p>Increase in the number of merchant ships and tug boats in Sydney Harbour and associated safety and amenity impacts (1 submission)</p>	<p>The proposed increased throughput capacity would increase Cement Australia vessels in Sydney Harbour by approximately 25 vessels per year, to a total of approximately 55 vessels per year. Noting that 1,200 commercial vessels enter the Harbour each year, the number of additional vessels in Sydney Harbour as a result of the proposed development is less than 5% of total current shipping movements of large commercial vessels.</p> <p>The Marine, Navigation and Safety assessment exhibited concludes that the proposed impacts are not likely to be significant and that there are appropriate processes in place to ensure the increased movements of large commercial vessels can be safely accommodated and managed through White Bay and the broader Sydney Harbour shipping channels.</p>
<p>Future use of the Bays Precinct, particularly with respect to future pedestrians, recreational areas, mixed use areas, residents and businesses (1 submission)</p>	<p>The Site is owned by the Port Authority of NSW, and is located within the Glebe Island Silos Sub-Precinct of Bays West.</p> <p>A key Land Use and Function direction under the Bays West Place Strategy, and reiterated in the recently completed Bays West Stage 1 Master Plan and Urban Design Framework, is that the future development of Bays West will be carried out in a way that will "retain, manage and allow the essential strategic port and maritime industry uses to grow and evolve".</p> <p>The site is leased to Cement Australia and is owned by the Port Authority of NSW. This application does not seek any refinements to the facility, however notes that discussions between Cement Australia and the Port Authority of NSW are ongoing to determine the optimal response to enabling the ongoing functional capacity of the Glebe Island and White Bay Port in the context of the transition towards a more mixed-use precinct,</p> <p>As part of the Bays West transition, the Port Authority of NSW is currently preparing a 'Port Innovation and Integration Plan', which will set out the current and future port and working harbour uses to be retained and their integration with the future of Bays West. In this context, the future evolution of the Cement Australia facility will necessarily be informed by the outcome of the detailed master planning for the Glebe Island Silos sub-precinct as well as the Port Authority of NSW's 'Port Innovation and Integration Plan'.</p>
<p>Lighting and impacts on residential areas (17 submissions)</p>	<p>Glebe Island is a working port and adequate lighting is required to facilitate port activity. The facility is proposed to maintain its existing hours of operation, operating 24 hours a day, 7 days a week. There is no change to the schedule of lighting for the site.</p>

Matter raised	Response
Approval period limit (2 submissions)	The Site is owned by the Port Authority of NSW. This ongoing control over the tenure of the facility, which is not usually available when development consent is sought on land that is not owned by the NSW Government, means that it is unnecessary to try and pre-empt the integration requirement of the Cement Australia facility with the Bays West transition, or to place an expiration date on any development consent. Bays West transition requirements can be addressed through lease arrangements as required in the future when there is more certainty around the timing of the Glebe Island Silos sub-precinct and the associated port integration requirements.
Odour (2 submissions)	Note above response in relation to air quality. The proposal is unlikely to result in any adverse impacts in relation to odour, noting that the proposal results in minimal air quality impacts.
Water quality (3 submissions)	The proposal is not likely to result in impacts to water quality. Sydney Harbour is a working harbour and the proposal does not result in a significant increase to vessels navigating the harbour. Note above comments in relation to marine safety.
Commercial advantage over the Hanson Facility – being that the Cement Australia should be subject to the same operational hours and limits as Hanson (1 submission)	The facility performs a different function to the Hanson Aggregate Import Terminal, handling different types of materials (cementitious material compared to aggregates). There is therefore no commercial competition between Cement Australia and Hanson. Further, Hanson was a new facility, located closer to the residential areas of Pyrmont, whereas as the Cement Australia facility is an existing activity (which currently operates during the night-time period) and is located further away from residential areas.

5.0 Conclusion

Cement Australia is a leading manufacturer and distributor of concrete and cementitious material and seeks to adopt best practice in the manufacture and distribution of product throughout Sydney. The exhibited EIS and supplementary material outlines how the anticipated environmental impacts associated with the proposed development can be managed to the extent that ensures that the development is appropriate for the site and could be approved.

During the exhibition of the EIS 83 submissions were received, including 73 submissions from members of the public in objection to the development. 5 submissions were prepared from government agencies. This response to submissions has outlined these submissions and provided an appropriate response to address the issues raised in the submissions. Additional supplementary assessment from Traffix and ERM have been prepared to address the traffic and noise issues raised in submissions respectively.

The proposed development does not result in any physical works or structures at the site, and includes enhanced mitigation measures to minimise and manage air quality impacts, traffic impacts, and noise impacts. As demonstrated by the exhibited EIS, the location of the site close to freeways and major arterial roads will provide for efficient access to infrastructure and development sites within Greater Sydney to ensure the long term efficiency and sustainability of the cement supply chain via Glebe Island.

The revised supporting documentation enables DPE to undertake an informed assessment of the proposal. The findings of the revised supporting consultant documentation that are relevant to the amended design are summarised in this report, with additional findings reported by the consultant team submissions and within the response table and the other relevant appendices.

The matters raised in the public and agency submissions are considered to have been fully addressed in the additional assessments carried out or otherwise through responses providing further information or clarifications. No further engagement has been carried out and no project amendments are proposed.