

Planning Secretary's Environmental Assessment Requirements

Section 4.12(8) of the *Environmental Planning and Assessment Act 1979* Schedule 2 of the Environmental Planning and Assessment Regulation 2000

Application Number	SSD-8595604
Project Name	Glebe Island Silos Cement Throughput Increase
Development	Increase of annual throughput capacity of cementitious material from 500,000 tonnes per annum (tpa) to 1,200,000 tpa.
Location	Lot 12 Sommerville Road, Rozelle (Lot 12 DP1170710)
Applicant	CEMENT AUSTRALIA HOLDINGS PTY LTD
Date of Issue	11/08/2020
General Requirements	<p>The Environmental Impact Statement (EIS) for the development must meet the form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (the Regulation).</p> <p>In addition, the EIS must include:</p> <ul style="list-style-type: none"> · a detailed description of the development, including: <ul style="list-style-type: none"> - an accurate history of the site, including development consents; - the need for the proposed development - justification for the proposed development - likely staging of the development - likely interactions between the development and existing, approved and proposed operations in the vicinity of the site - plans of any proposed building works - contributions required to offset the proposal, and - infrastructure upgrades or items required to facilitate the development, including measures to ensure these upgrades are appropriately maintained. · consideration of all relevant environmental planning instruments, including identification and justification of any inconsistencies with these instruments · consideration of issues discussed in Attachment 2 (public authority responses to key issues) · a risk assessment of the potential environmental impacts of the development, identifying the key issues for further assessment · a detailed assessment of the key issues specified below, and any other significant issues identified in this risk assessment, which includes: <ul style="list-style-type: none"> - a description of the existing environment, using sufficient baseline data - an assessment of the potential impacts of all stages of the development, including any cumulative impacts, taking into consideration relevant guidelines, policies, plans and statutes and - a description of the measures that would be implemented to avoid, minimise, mitigate and if necessary, offset the potential impacts of the development, including proposals for adaptive management and/or contingency plans to manage significant risks to the environment. · a consolidated summary of all the proposed environmental management and monitoring measures, highlighting commitments included in the EIS. <p>The EIS must also be accompanied by:</p> <ul style="list-style-type: none"> · high quality files of maps and figures of the subject site and proposal · a report from a qualified quantity surveyor providing: <ul style="list-style-type: none"> - a detailed calculation of the capital investment value (CIV) of the proposal (as

	<p>defined in clause 3 of the Environmental Planning and Assessment Regulation 2000) of the proposal, including details of all assumptions and components from which the CIV calculation is derived. The report shall be prepared on company letterhead and indicate the applicable GST component of the CIV</p> <ul style="list-style-type: none"> - an estimate of the jobs that will be created by the development during the construction and operational phases of the proposed development and certification that the information provided is accurate at the date of preparation.
Key issues	<p>The EIS must include an assessment of the potential impacts of the proposal (including cumulative impacts) and develop appropriate measures to avoid, mitigate, manage and/or offset these impacts.</p> <p>The EIS must address the following specific matters:</p> <ol style="list-style-type: none"> 1. Statutory and strategic context – including: <ul style="list-style-type: none"> - detailed justification for the proposal and the suitability of the site - detailed justification that the proposed land use is permissible with consent - a detailed description of the history of the site, including the relationship between the proposed development and all development consents and approved plans previously and/or currently applicable to the site - demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, adopted precinct plans, draft district plan(s) and adopted management plans and justification for any inconsistencies. This includes, but is not limited to: <ul style="list-style-type: none"> o State Environmental Planning Policy (State Significant Precincts) 2005 o State Environmental Planning Policy (State and Regional Development) 2011 o Sydney Regional Environmental Plan No. 26 – City West o Greater Sydney Region Plan: A Metropolis of Three Cities o Our Greater Sydney 2056: Central City District Plan o Future Transport Strategy 2056. 2. Suitability of the Site – including: <ul style="list-style-type: none"> - a detailed justification that the existing facility can accommodate the proposed development, having regard to the scope of the operations of the existing facility and its environmental impacts and relevant mitigation measures - description of how the proposed development integrates with existing onsite operations. 3. Community and Stakeholder Engagement – including: <ul style="list-style-type: none"> - a detailed community and stakeholder participation strategy which identifies who in the community has been consulted and a justification for their selection, other stakeholders consulted and the form(s) of the consultation, including a justification for this approach - a report on the results of the implementation of the strategy including issues raised by the community and surrounding owners and occupiers that may be impacted by the proposal - details of how issues raised during community and stakeholder consultation have been addressed and whether they have resulted in changes to the proposal and - details of the proposed approach to future community and stakeholder engagement based on the results of the consultation. 4. Air Quality and Odour – including: <ul style="list-style-type: none"> - a quantitative assessment of the potential air quality, dust and odour impacts of the development in accordance with relevant Environment Protection Authority guidelines - cumulative impacts from existing onsite operations and from surrounding developments

	<ul style="list-style-type: none"> - the details of buildings and air handling systems and strong justification for any material handling, processing or stockpiling external to buildings - details of proposed mitigation, management and monitoring measures. <p>5. Noise and Vibration – including:</p> <ul style="list-style-type: none"> - a quantitative noise and vibration impact assessment of operational activities undertaken by a suitably qualified person in accordance with the relevant Environment Protection Authority guidelines and including an assessment of nearby sensitive receivers - cumulative impacts from existing onsite operations and from surrounding developments - details and justification of the proposed noise mitigation, management and monitoring measures. <p>6. Traffic and Transport – including:</p> <ul style="list-style-type: none"> - details of all traffic types and volumes likely to be generated during operation, including a description of key access / haul routes - an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model - plans demonstrating how all vehicles likely to be generated during operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network - details and plans of any proposed the internal road network, loading dock servicing and provisions, on-site parking provisions, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards - details of the largest vehicle anticipated to access and move within the site, including swept path analysis - swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site - details of road upgrades, infrastructure works, or new roads or access points required for the development if necessary - cumulative impacts from existing onsite operations and from surrounding developments. <p>7. Marine Traffic, Navigation and Safety – including:</p> <ul style="list-style-type: none"> - an assessment of the proposed development on water-based traffic, marine structures, marine safety and navigation, including cumulative impacts. - provide details of vessel movements including frequency and vessel size. <p>8. Heritage – including:</p> <ul style="list-style-type: none"> - an assessment of heritage impacts prepared by a suitably qualified heritage consultant in accordance with the guidelines in the NSW heritage manual - identify all heritage items within the vicinity of the site including built heritage, landscapes and archaeology - the impacts of the development on heritage item(s) including physical impacts such as vibration and visual amenity - measures to avoid and/or mitigate impact on the heritage significance of the site and the surrounding heritage items. <p>9. Planning agreement/development contributions – demonstration that satisfactory arrangements have been or would be made to provide, or contribute to the provision of, necessary local and regional infrastructure required to support the development.</p>
Consultation	<p>During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners.</p> <p>In particular you must consult with:</p> <ul style="list-style-type: none"> - Inner West Council

	<ul style="list-style-type: none"> - Transport for NSW - Environment Protection Authority - Port Authority of NSW - Heritage NSW - DPIE Environment, Energy and Science Group <p>The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p>
Further consultation after 2 years	If you do not lodge a Development Application and EIS for the development within 2 years of the issue date of these SEARs, you must consult further with the Planning Secretary in relation to the preparation of the EIS.
References	The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans as identified. While not exhaustive, the following attachment contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this proposal.

ATTACHMENT 1

Technical and Policy Guidelines

The following guidelines may assist in the preparation of the environmental impact statement. This list is not exhaustive and not all of these guidelines may be relevant to your proposal.

Many of these documents can be found on the following websites:

<http://www.planning.nsw.gov.au>

<http://www.shop.nsw.gov.au/index.jsp>

<http://www.australia.gov.au/publications>

<http://www.epa.nsw.gov.au/>

<http://www.environment.nsw.gov.au/>

<http://www.dpi.nsw.gov.au/>

Plans and Documents

The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. Provide these as part of the EIS rather than as separate documents.

In addition, the EIS must include the following:

1. An existing site survey plan drawn at an appropriate scale illustrating:
 - the location of the land, boundary measurements, area (sqm) and north point
 - the existing levels of the land in relation to buildings and roads
 - location and height of existing structures on the site
 - location and height of adjacent buildings and private open space
 - all levels to be to Australian Height Datum (AHD).
2. Locality/context plan drawn at an appropriate scale should be submitted indicating:
 - significant local features such as heritage items
 - the location and uses of existing buildings, shopping and employment areas
 - traffic and road patterns, pedestrian routes and public transport nodes.
3. Drawings at an appropriate scale illustrating:
 - detailed plans, sections and elevations of the existing building, which clearly show all proposed buildings
 - detailed plans of proposed access driveways, internal roads, carparking and external alterations services infrastructure.

4. Schedule of materials, colours and additions. finishes.

Documents to be Submitted

Documents to submit include:

- one (1) hard copy and one (1) electronic copy of all the documents and plans for review prior to exhibition
- other copies as determined by the Department once the development application is lodged.

Policies, Guidelines & Plans

Aspect	Policy / Methodology
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Traffic, Transport and Access

	Roads Act 1993
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	State Environmental Planning Policy (Infrastructure) 2007
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	Guide to Traffic Generating Development (RTA, 2002 as updated)
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	Road Design Guide (RMS, 2015-2017)
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	Guide to Traffic Management – Pt 12: Traffic Impacts of Development (Austroads, 2016)
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	Guidelines for Planning and Assessment of Road Freight Access in Industrial Areas (Austroads, 2014)
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	Bicycle Parking Facilities: Guidelines for Design and Installation (AS 2890.3:2015)
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	Integrated Public Transport Service Planning Guidelines: Sydney Metropolitan Area (TfNSW, 2013)
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	Future Transport Strategy 2056 (TfNSW, 2018)
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	Greater Sydney Services and Infrastructure Plan (TfNSW, 2018)
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	NSW Freight & Ports Plan 2018-2023 (TfNSW, 2018)
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Soils and Water

	Managing Urban Stormwater: Soils & Construction (Landcom, 2004)
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Erosion and Sediment

	Soil and Landscape Issues in Environmental Impact Assessment (DLWC, 2000)
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	Wind Erosion – 2nd Edition (DIPNR, 2003)
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	National Water Quality Management Strategy Guidelines for Groundwater Protection in Australia (ARMCANZ/ANZECC, 2000)
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	NSW State Groundwater Policy Framework Document (DLWC, 1997)
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Groundwater

	NSW Aquifer Interference Policy (NOW, 2012)
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	Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources (NOW, 2011)
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	Storing and Handling Liquids: Environmental Protection (DECC, 2007)
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Stormwater

	Managing Urban Stormwater: Strategic Framework. Draft (EPA, 1996)
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	Managing Urban Stormwater: Council Handbook. Draft (EPA, 1997)
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	Managing Urban Stormwater: Treatment Techniques (DEC, 2006)
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	Managing Urban Stormwater: Source Control. Draft (EPA, 1998)
	Managing Urban Stormwater: Harvesting and Reuse (DEC, 2006)
<i>Wastewater</i>	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Effluent Management (ARMCANZ/ANZECC, 1997)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Use of Reclaimed Water (ARMCANZ/ANZECC, 2000)
	National Water Quality Management Strategy – Guidelines for Water Recycling: Managing Health and Environmental Risks (Phase 1) (EPHC, NRMCC & AHMC, 2006)
	National Water Quality Management Strategy – Guidelines for Water Recycling: Managing Health and Environmental Risks (Phase 2) (EPHC, NRMCC & AHMC, 2009)
<i>Contamination</i>	State Environmental Planning Policy No. 55 – Remediation of Land
Hazards and Risk	
	State Environmental Planning Policy No. 33 – Hazardous and Offensive Development
	Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines (DoP, 2011)
Biodiversity	
	Biodiversity Conservation Act 2016
	Biodiversity Assessment Method (OEI, 2017)
	Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018)
Heritage	
	Heritage Act 1977
	NSW Heritage Manual (HO and DUAP, 1996)
	The Burra Charter (ICOMOS Australia, 2013)
	Statements of Heritage Impact (HO and DUAP, 2002)
	Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW, 2010)
	Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011)
	Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW, 2010)
Noise and Vibration	
	Assessing Vibration: A Technical Guide (DEC, 2006)
	Noise Policy for Industry (EPA, 2017)
	Environmental Criteria for Road Traffic Noise (EPA, 1999)
	Noise Guide for Local Government (EPA, 2013)
	Interim Construction Noise Guideline (DECC, 2009)
Air Quality	
<i>Air Quality</i>	Protection of the Environment Operations (Clean Air) Regulation 2002
	Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales (DEC, 2007)
	Approved Methods for the Modelling and Assessment of Air Pollutants in New

	South Wales (EPA, 2016)
<i>Odour</i>	Assessment and Management of Odour from Stationary Sources in NSW (DEC 2006)
<i>Greenhouse Gas</i>	AGO Factors and Methods Workbook (AGO, 2018)
	Guidelines for Energy Savings Action Plans (DEUS, 2005)
Upper Canal and Warragamba Pipeline Corridors	
	Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines (WaterNSW, 2018)
Bushfire	
	Planning for Bushfire Protection (RFS, 2006)
Waste	
	Waste Avoidance and Resource Recovery Strategy 2014-2021 (EPA)
	The National Waste Policy: Less Waste More Resources 2009
	Waste Classification Guidelines (EPA 2008)
	Environmental guidelines: Composting and Related Organics Processing Facilities (DEC 2004)
	Environmental guidelines: Use and Disposal of Biosolid Products (EPA 1997)
	Composts, soil conditioners and mulches (Standards Australia, AS 4454)
	NSW Energy from Waste Policy Statement (EPA 2015)
	Standards for Managing Construction Waste in NSW (EPA 2018)
Visual	
	Control of Obtrusive Effects of Outdoor Lighting (AS 2482)
Social	
	Social Impact Assessment Guideline (DPE, 2017)

ATTACHMENT 2

Government Authority Responses to Request for Key Issues

Mr Shaun Williams
Environmental Assessment Officer
Industry Assessments
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Williams

Request for SEARs for Glebe Island Silos Cement Throughput Increase (SSD-8595604)

Thank you for your correspondence via the Major Projects Portal on 23 July 2020, requesting Transport for NSW (TfNSW) to provide input for the above.

The suggested inclusions to the SEARs in relation to the following are provided in **TAB A**:

- Strategic and Statutory Context;
- Navigation and Safety;
- Traffic and Transport Assessment (Operation); and
- Consultation.

If you require clarification on the above, please don't hesitate to contact Para Sangar, Senior Transport Planner, Land Use Planning and Development on 0466 024 892.

Yours sincerely



5/8/2020

Mark Ozinga

Principal Manager Land Use Planning and Development
Customer Strategy and Technology

Objective Reference

CD20/06205

TAB A – Suggested Inclusions to the SEARs

Strategic and Statutory Context

The EIS shall address the relevant planning provisions, goals and strategic planning objectives in the following:

- NSW State and Premier Priorities;
- Sydney Region Plan: A Metropolis of Three Cities;
- Central City District Plan;
- Future Transport Strategy 2056;
- State Infrastructure Strategy 2018;
- Sustainable Sydney 2030;
- Guide to Traffic Generating Developments;
- Sustainable Sydney 2030; and
- NSW Bicycle Guidelines.

Navigation and Safety

The EIS must include a Navigation and Safety Assessment (NSA) prepared in accordance with relevant guidelines. The NSA must include, but not limited to, the following:

- Consideration of the potential impact of increased vessel movements likely to be generated by the proposal on the existing users;
- An assessment impacts of increased vessel movements within the Sydney Harbour; and
- Consideration of measures to ensure the safety of all recreational users (if any).

Traffic and Transport Assessment (Operation)

The EIS must include a Traffic and Transport Impact Assessment (TTIA) prepared in accordance with relevant guidelines. The TTIA must include, but not limited to, the following:

- Details of the current and likely daily and peak hour vehicle, public transport, pedestrian and bicycle movements from the site and the road network adjacent to the site;
- Daily and peak additional traffic movements generated by the project for all modes including details of all light and heavy vehicle types and volumes;
- Details of anticipated haulage routes and vehicle types and likely arrival and departure times;
- The safety and performance of the surrounding road network. Detailed assessment of the existing and future performance of key intersections providing access to the site with additional traffic movements supported by appropriate modelling and analysis to the satisfaction of TfNSW. This assessment needs to include cumulative impacts of all approved projects and developments including the WestConnex M4-M5 Link, Western Harbour Tunnel, Port Authority's Multi-User Facility and Hanson's Concrete Batching Plant at Glebe Island;

- Plans demonstrating how additional vehicles likely to be accommodated on the site to avoid queuing in the public road network;
- Swept path diagrams that show vehicles entering, exiting and manoeuvring throughout the site, if there is any changes to the existing vehicle access arrangements and type of heavy vehicles.
- Details of road network upgrades required for the development (if any).
- Proposed car parking provision for staff and visitors, including consideration of the availability of current and future public transport and the requirements of the relevant parking codes;
- Detailed pedestrian route assessment of key routes between public transport nodes (existing and future) and the proposed development site;
- Measures to be implemented to encourage users of the development to make sustainable travel choices, including walking, cycling, public transport and car sharing, such as provision of adequate bicycle parking and end of trip facilities in accordance with the Council DCP, wayfinding strategy and preparation of a travel access guide;
- Mitigation measures for the impacts identified in the TTIA, including management practices proposed for loading, drop-off and pick-up, walking access, cycling access, vehicle access and parking and any other transport management and access issues as appropriate to the site.

Consultation

During the preparation of the EIS, the applicant must consult with Transport for NSW.

Shaun Williams
Department of Planning Industry and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Shaun

Request for Secretary's Environmental Assessment Requirements (SEARS) for Glebe Island Silos Cement through-put Increase SSD 8595604

Thank you for your referral inviting SEARS input from the Heritage Council of NSW on the above State Significant Development proposal (23 July 2020).

The proposed SSD site includes the Local Heritage Listed item, Glebe Island Silos, and is in the vicinity of State Heritage Register item White Bay Power Station (SHR no. 01015).

It is recommended that the draft SEARs below are adopted:

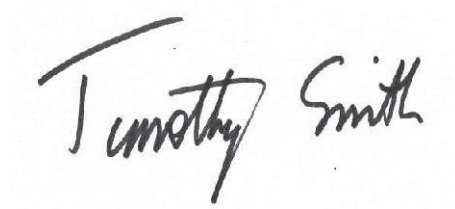
Heritage and archaeology

- a) A Statement of Heritage Impact (SOHI) prepared by a suitably qualified heritage consultant in accordance with the guidelines in the NSW Heritage Manual. The SOHI is to address the impacts of the proposal on the heritage significance of the site and adjacent areas and is to identify the following:
- all heritage items (state and local) within the vicinity of the site including built heritage, landscapes and archaeology, detailed mapping of these items, and assessment of why the items and site(s) are of heritage significance;
 - compliance with the relevant Conservation Management Plan;
 - the impacts of the proposal on heritage item(s) including physical impacts such as vibration and visual amenity;
 - the attempts to avoid and/or mitigate the impact on the heritage significance of the site and the surrounding heritage items; and
 - justification for any changes to the heritage fabric or landscape elements including any options analysis.

As the site contains a local heritage item, and other local items are in the vicinity, advice should be sought from the relevant local council.

If you have any questions regarding the above SEARs advice (SSD 8595604), please contact David Nix, Senior Heritage Officer at Heritage NSW on 9895 6523 or David.nix@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink that reads "Timothy Smith". The signature is written in a cursive style, with the first name "Timothy" and the last name "Smith" clearly legible.

Tim Smith OAM

Director Heritage Operations

Heritage NSW

Department of Premier and Cabinet

As Delegate of the Heritage Council of NSW

5 August 2020

5 August 2020

Department of Planning, Industry & Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Shaun Williams
by Email: shaun.williams@planning.nsw.gov.au

Dear Mr. Williams,

Secretary's Environmental Assessment Requirements – Glebe Island Silos Cement Throughput Increase – SSD 8595604

Thank you for providing Port Authority of NSW (Port Authority) with the opportunity to provide input into the Secretary's Environmental Assessment Requirements (SEARs) for Cement Australia's State Significant Development (SSD) proposal for a cement throughput increase at Glebe Island Silos (the Project). For the purposes of providing input into the SEARs, Port Authority has reviewed the Scoping Report and also makes reference to ongoing discussions between Cement Australia (the Proponent) and Port Authority regarding the Project.

Noise

Port Authority notes that Cement Australia refers to the draft Port Noise Policy and Vessel Noise Operating Protocol (the Policy), which have been developed by Port Authority in consultation with the EPA and the Department of Planning, Industry and Environment (DPIE) and are currently on public exhibition until 10 August 2020. Cement Australia states the compliance with the Policy, including the forthcoming Noise Precinct which Port Authority is establishing for Glebe Island port operations in line with the EPA's *Noise Policy for Industry*, would be enforced by way of a Lease Agreement between Port Authority and Cement Australia, and could be reinforced by way of suitable conditions of consent.

To ensure consistency with this noise management approach for Glebe Island (i.e. land side noise under a Noise Precinct and ship based noise under the Port Noise Policy and Vessel Noise Operating Protocol), Port Authority requests that DPIE specifically include requirements in the SEARs for a noise assessment to be prepared in accordance with:

- EPA's *Noise Policy for Industry* and the Noise Precinct being established for Glebe Island as described in Port Authority's Port Noise Policy (with particular reference to Appendix G) for landside noise; and
- Port Authority's Port Noise Policy (with particular reference to Appendix F and the Vessel Noise Operating Protocol) for vessel noise at berth.

Marine Navigation and Safety

Port Authority notes that Cement Australia commit to undertaking a preliminary assessment of increased shipping as part of the EIS. Port Authority requests that DPIE specifically include a requirement that the preliminary assessment of marine traffic, navigation and safety be undertaken in consultation with, and to the satisfaction of, the Harbour Master.

Please don't hesitate to contact me for any additional information or clarification.

SYDNEY

ABN: 50 825 884 846

YAMBA

PO Box 143
Yamba NSW 2464
T: 61 2 6646 2002

NEWCASTLE

PO Box 663
Newcastle NSW 2300
T: 61 2 4985 8222

SYDNEY

PO Box 25
Millers Point NSW 2000
T: 61 2 9296 4999

PORT KEMBLA

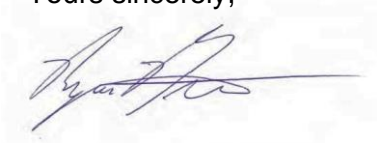
PO Box 89
Port Kembla NSW 2505
T: 61 2 4275 0100

EDEN

PO Box 137
Eden NSW 2551
T: 61 2 66461596

www.portauthoritynsw.com.au

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Ryan Bennett', with a long horizontal flourish extending to the right.

Ryan Bennett

Senior Planning & Sustainability Manager



Our ref: DOC20/601630

Senders ref: SSD8595604 (Inner West)

Shaun Williams
Industry Assessments
Planning and Assessment Group
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Dear Mr Williams,

Subject: Request for SEARs for Glebe Island Silos Cement Throughput, at Lot 12 DP 1170710, Sommerville Road, Rozelle (SSD 8595604)

Thank you for your e-mail received on 24 July 2020, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the Request for SEARs for Glebe Island Silos Cement Throughput, at Lot 12 DP 1170710, Sommerville Road, Rozelle.

EES has reviewed the scoping report prepared by Ethos Urban dated 22 July 2020 and makes the following comment:

EES notes that the request for SEARs is particularly in relation to a proposed increase to the currently approved maximum throughput for the cementitious material storage silos and related port facilities at the above-mentioned address. The proponent seeks consent for the permitted maximum throughput of the currently approved cementitious material unloading and storage facility of up to 1,200,000 tonnes per annum, supports a more effective and efficient utilisation of the facility, and it does not propose any physical works, nor any changes to current operating practices, including hours of operation.

EES further notes that the physical capacity of the site is not increasing or changing, and this application seeks approval to increase the maximum throughput, which is essentially an administrative capacity limit only, as it does not relate to the actual capacity of the existing physical infrastructure. No physical works are proposed.

Therefore, EES has no comments at this stage of the process.

Please note Aboriginal cultural heritage (ACH) matters, including advice on SSIs and SSDs, is now managed by the Heritage NSW. The new contact for the ACH regulation team is heritagemailbox@environment.nsw.gov.au.

Should you have any queries regarding this matter, please contact Bronwyn Smith, Senior Conservation Planning Officer on 9873 8604 or bronwyn.smith@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads 'S. Harrison'.

28/07/20

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Climate Change and Sustainability



Contact: Ken Welsh

Phone: 9392 5731

3 August 2020

Attn. Shaun Williams

shaun.williams@planning.nsw.gov.au

Mr Jim Betts

Secretary of Department of Planning, Industry and Environment

4 Parramatta Square,

12 Darcy Street

Parramatta NSW 2150

Dear Mr Betts,

Request for SEARs for Glebe Island Silos Cement Throughput Increase

Thank you for the opportunity to provide input into the draft Secretary's Environmental Assessment Requirements (SEARs) for the proposed expanded throughput for the Glebe Island Cement Silos Facility.

The correspondence forward to Council indicated that the proponent proposes that the existing temporary approval (600,000 tonne per annum - expiring in May 2021) be expanded to 1,200,000 tonne per annum. It is, however, unclear in the proponent's correspondence whether they are requesting an extension of the existing temporary approval or a new, expanded permanent approval.

Council expresses its concern that any approval, existing or future, should remain a temporary approval of no more than 18 months; capable of being renewed subject to a new environmental assessment and appropriate consultation, being conducted in each instance.

Having reviewed the limited information provided Council is aware that the proposal is within the physical capability of the silos to contain such quantities of materials, and further that the throughput capacity of the site's weighbridge will limit the ability of the facility to handle more than 24 truck movements per hour (12 in/12 out). While no information has been provided on the total existing traffic generated by the site, the total number of trucks likely to be generated as a result of the proposal can be assumed to increase by 100% as a result of the doubling of the quantity of materials handled.

In providing the suggestions below, Council assumes that all of the environmental, sustainability, heritage, safety and traffic elements normally addressed in such a project's SEARs will be included and consequently this submission's focus is on additional, location specific requests.

Based on the information available, and experience with similar facilities, it requested that any approval be temporary in nature and that the following significant strategic issues be addressed in the Environmental Impact Statement (EIS), with robust mitigation measures identified for these matters.

General issues to be specifically addressed in the project SEARs should include, but not be limited to, the following:

- Cumulative impacts of the operation of the proposed facility in relation to:
 - the construction of major transport infrastructure projects in the immediate vicinity of the facility over the next decade, including WestConnex, Western Harbour Tunnel, Iron Cove Link and the West Metro. Assessment of the Metro West project should examine the proposed Port

- Roads Realignment and construction of the Metro West Bays Station, as well as a possible a station in Pyrmont;
 - construction of elements of the Bays State Significant Precinct (SSP) during the next ten years that may incorporate mixed use development including residential uses and knowledge intensive/technological industries as well as public domain connections and adaptive reuse of the State-listed heritage White Bay Power Station.
- Cumulative impacts of the operation of all facilities in and around Glebe Island/White Bay, particularly in relation to the increased residential, employment and visitor population likely to be generated by completion of parts of, or all of the Bays State Significant Precinct (SSP). Adaptive reuse of the State-listed heritage White Bay Power Station is likely to generate substantial levels of traffic. The EIS must also consider the existing impacts of the Cruise Passenger Terminal at White Bay.
- The EIS should include measures that will ensure that the proposal will not compromise the permanent re-opening of the Glebe Island Bridge for active transport as indicated in the Inner West Council Integrated Transport Plan and the UrbanGrowth NSW - Bays Precinct, Sydney: The Transformation Strategy (October 2015) The following references from the Strategy illustrate the relevant policy objectives: page 22 "Reconnecting Balmain to Pyrmont by working towards the adaptive re-use of Glebe Island Bridge" and page 52 "Work towards operationalising Glebe Island Bridge for active and public transport".
- More generally the EIS must address the provisions of the UrbanGrowth NSW - Bays Precinct, Sydney: The Transformation Strategy and particularly the "The Bays Precinct Commitments" given in the Strategy, plus other objectives such as a possible innovation campus at Glebe Island in emerging industries such as: medical and biomedical research, international education, digital disruptors, infrastructure and engineering, and maritime technology; the continuous public foreshore Bays Waterfront Promenade from Balmain to Pyrmont; and water quality maintenance or enhancement.
- The EIS should also consider the possible implications of the limited lifespan of remaining stocks of Australian sand suitable for cement production. It is understood that there may only be approximately 15-20 years stock of these sands left. Such a shortage is already encouraging investigations into alternative construction materials and consequently may reduce the long term need for a facility such as that currently proposed.
- Impact of the site's increased use on the amenity of the future Metro West Bays Station (should a longer term approval be granted) and the Cruise Passenger Terminal (particularly noting the proposed expansion of its event facility).

The sections below provide more detailed recommendations for inclusion in the SEARs.

Acoustic issues

It is recommended that an acoustic assessment be carried out addressing the following as a minimum:

- Consideration of the likelihood of increased numbers of residents Working from Home and so making daytime noise more relevant to adjacent receivers;
- Nominate the most affected premises in the Inner West Council local government area and;
- Noise from truck movements such as reversing signals, loading, mixing and engines revving;
- Noise from shipping movements such as unloading of aggregates and other material;

- Noise from plant and equipment such as compressors, pumps, vacuums, aggregate and raw materials loading bins, generators, cranes, forklifts, ship's engines, conveyors;
- Public address systems;
- Cumulative impact of noise sources including Cruise Terminal, construction of and then operation of WestConnex, Western Harbour Tunnel, Iron Cove Link and a West Metro Bays Station (and possible Pyrmont Station); construction and operation of other elements of the Bays State Significant Precinct (SSP) and facility;
- Relevant measures to ensure compliance with the Protection of the Environment Operations Act 1997 and other relevant guidelines. The adopted air quality goals and health risk standards, and suitability for assessment of the risk of impacts.

Air quality and dust management

Details will be required to confirm that the design of the facility will continue to safely accommodate (and mitigate against) emission of particulates (eg cement, fly ash, sand etc) to the environment, neighbouring residential and employment properties. There should be an expert review of the development in relation to air quality and a health risk assessment that covers:

- Consideration of the likelihood of increased numbers of residents Working from Home and so making daytime dust more relevant to adjacent receivers;
- The adequacy of local background air quality data utilised in the assessment of cumulative (project plus background) impacts;
- The overall predicted cumulative impact from the project, in conjunction with existing background and emissions from surrounding land uses;
- The appropriateness of proposed mitigation strategies, and identification of any additional mitigation measures or controls that could further reduce the potential exposure of the local population to air pollution and odour emissions from the project.
- The ecological value of waterway and land to be impacted upon by the proposed development.

Ecology, Soil and Water

The assessment of the potential impacts on all hydrology including Sydney Harbour (including White, Johnston's, Rozelle and Blackwattle Bays) should address the following matters:

- The quality of the foreshore line on-site and off-site waterways which may be directly or indirectly affected by the proposal including, but not limited to:
 - Physical characteristics of the waterway;
 - Connectivity with waterway corridors,
 - Details of the location of threatened or endangered aquatic flora and fauna (a map is usually the best way of showing this, but other documentation, such as a flora or fauna survey report, may also be necessary);
 - Existing erosion and sediment conditions;
 - Below water land formations, current levels erosion and bank stability;
 - Stormwater discharge points and stormwater treatment measures.
- Impacts on stormwater discharge points and stormwater treatment measures;
- Ecological impacts of the development;
- Bank stability assessment demonstrating the building and development is not at risk from erosion processes;
- Protects and manages the natural, cultural, recreational and economic attributes of the harbour;
- Protects and improves existing public access to and along coastal foreshores to the extent that this is compatible with the natural attributes of the coastal foreshore. This is to include access for pedestrians or persons with a disability;

- Protects and preserves Aboriginal cultural heritage, and Aboriginal places, values, customs, beliefs and traditional knowledge.
- Addresses visual amenity;
- Protects and preserves the marine environment of New South Wales;
- Protects and preserves rock platforms;
- Manages the coastal zone in accordance with the principles of ecologically sustainable development (within the meaning of section 6 (2) of the Protection of the Environment Administration Act 1991);
- Is suitable given its type, location and design and its relationship with the surrounding area.
- Includes measures to conserve fish (within the meaning of Part 7A of the Fisheries Management Act 1994) and marine vegetation (within the meaning of that Part), and their habitats.
- Reducing the potential for conflict between land-based and water-based coastal activities;
- Impacts upon the water quality of coastal waterbodies;
- Avoiding impediments to physical, land-based public access to or along the coastal foreshore;
- Avoiding discharge of untreated stormwater, including displaced particulates, into the Harbour.

Environmental Management

The Environmental Management Plan should address:

- Emergency and spill response procedures;
- Pollution prevention;
- Details of truck wash bays, slump stands and wheel washing facilities;
- Chemical storage and disposal;
- Noise management of matters such as those referred to in the Acoustics section above.

Light

Consideration must be given to the potential impact of lights associated with the facility's proposed 24 / 7 operation.

Traffic and transport

- Consideration of traffic congestion-creep, where each individual project, or modification, increases congestion by a small amount and is consequently considered acceptable because it represents only a very small proportion of the total existing traffic levels/congestion.
- Consideration of Council's (and TfNSW's) long term vision for reduced traffic along the Victoria Road Corridor (once the Iron Cove Link is open).
- As no additional parking is proposed it is requested that an assessment of staff parking requirements and the ability for the site to cater for the peak staff parking demand.
- Operational contingency proposals to accommodate storage of trucks prior to loading, should loading or dispatch delays occur.
- Consideration of increased conflict with pedestrians and cyclists resulting from increased truck movements, noting that the proposal will double the number of existing movements and consequently double the amount of conflict between trucks and other road users.
- Assessment of impacts on the adjacent active transport network.
- Consideration of any impact the increased truck movements may have on foreshore access as proposed by The Bay Precinct Strategy, Council, Metro West and the Cruise Passenger Terminal.
- As the through-put capacity of the existing weighbridge limits the number of trucks per hour, it is likely that the increased capacity/through-put proposed will need to be accommodated throughout the day. Consequently, it is requested that the EIS's traffic analysis include assessment of impacts throughout the day, in addition to peak periods.
- Details of on-site truck management of the site that demonstrates the facility will not result in on-street queuing of trucks and that an adequate manoeuvring area is provided on site for peak truck periods

that can accommodate parked trucks, trucks being loaded and staff parking. Swept Path Assessment is requested to demonstrate that the above requirements can be met.

- Intersection modelling (with and without the WestConnex and the Harbour Tunnel) of the following intersections during the weekday AM, business and PM peaks, and a Saturday midday, assuming that a cruise ship is in port at White Bay:
 - The Crescent/James Craig Road
 - The Crescent/Victoria Road
 - The Crescent/City West Link Road
 - The Crescent/Johnston St/Chapman Road
 - Johnston Street/Booth Street
 - Booth Street/Wigram Road
 - Robert Street/Victoria Road
 - Darling Street/Victoria Road.
- The modelling of intersection operation should include all construction and operational scenarios involving the major projects affecting the adjacent road network.
- Travel routes for trucks associated with the facility should be provided, with these routes being developed with consideration of sensitive land uses in the area including frontage uses on Johnston Street and The Crescent. Consideration of additional cyclist/pedestrian safety measures at The Crescent /James Craig Road intersection given it is a key cycle link and that a shared path is provided on the southern side of The Crescent.
- Management plans for both operational and construction traffic should be provided:
 - excluding the use of Somerville Road, Robert Street and Mullens Streets:
 - activity associated with the facility should not preclude:
 - the 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.
- The Construction Traffic Management Plan should provide details of the routes for construction traffic to/from the site and of how the construction vehicles will utilise the State Road Network to avoid the use of Council Roads. This Plan should also provide details of the estimated staff parking demand and proposed parking arrangements to cater for staff parking on site without any impact on the local road network.
- A Co-ordination Plan should be provided to manage conflict between construction vehicles associated with WestConnex, Sydney Metro, Western Harbour Tunnel and the showing how both groups of trucks will be coordinated to minimise impacts on the adjacent road network. This will complement the Construction Traffic Management Plan.
- A Maritime Coordination plan should be provided to indicate how raw materials shipping, movements associated with the facility, will be managed to avoid impacting on the numerous complex movements in the vicinity, particularly in relation to the cruise passenger terminal, fishing fleet and superyacht marina.

Aboriginal Heritage

In proceeding with the project, it is essential to recognise the significance of White Bay and the surrounding area to the local indigenous people. While documentation on aboriginal sites and artefacts in the vicinity is limited, anecdotal advice from the local Community indicates that the area is particularly significant and should be dealt with sensitively and in accordance with all necessary protocols. Should the expansion of the facility necessitate any physical changes, including minor alterations to roads and surfaces, it is essential that potential impacts on Aboriginal Heritage be investigated.



Council considers that issues of Aboriginal Heritage are continually oversimplified and requests that attention be paid to the following:

- Should any excavation be required to accommodate the facilities expansion great care should be taken with all excavation, regardless of the depth (noting that there is potential for artefact finds in the top 1m in this area) and that all appropriate archaeological protocols should be adhered to throughout the project's construction phase. This is particularly relevant as the EIS tends to highlight known sites; however, Council's experience is that sites are likely to be distributed throughout the White Bay area.
- It is also requested that Aboriginal consultation should always take place when a project is located near any existing, or past, waterway in the Inner West, as these waterways were the "life blood" of Sydney's Indigenous People and are highly likely to include sensitive sites and yield artefacts;

Other Requirements:

- Emergency Management Plan
- Complaints Management Plan
- Access report should be provided with specific regard to the relevant environmental planning instrument provisions, the Disability Discrimination Act 1992, the relevant Australian Standards and provisions of the Building Code of Australia (BCA). Specific detail is to be provided as to how the development will ensure equitable access for persons with a disability or less mobile persons.
- In relation to contamination, if possible, existing concrete slabs and soils should not be disturbed.

Should you wish to discuss this submission please contact Ken Welsh, Team Leader Strategic Transport Planning and State Projects on 9392 5731 or email ken.welsh@innerwest.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Manod Wickramasinghe'.

Manod Wickramasinghe

TRAFFIC AND TRANSPORT PLANNING MANAGER

Mr Shaun Williams
Senior Planning Officer
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Williams

**Glebe Island Silos Cement Throughput Increase (SSD 8595604)
Secretary's Environmental Assessment Requirements (SEARs)**

I am writing to you in reply to your invitation to the Environment Protection Authority (EPA) to provide input to the draft Secretary's Environmental Assessment Requirements (SEARs) for the above State Significant Development (SSD) project.

The EPA understands the project involves an intensification of use at the site with cement throughput more than doubling capacity from 500,000 tonnes per annum (tpa) to 1,200,000 tpa, utilising existing infrastructure, and involving no construction activity. The EPA requests that the following be considered in relation to noise and air quality impacts when developing the SEARs:

Noise

- Consider the noise impacts on sensitive receivers from additional operational activities particularly from additional vehicles accessing the site and from increased ships at berth. This should include landside noise activities from trucks being loaded with cement, and noise from trucks on site.
- Provide an assessment of the cumulative noise impacts from other development projects both underway and proposed in and around the Bays Precinct including (but not limited to): Glebe Island Concrete Batching Plant, the Multi-User Facility, West Connex (Rozelle Interchange), Sydney Metro West and Sydney Fish Markets development.
- The assessment should include proposed noise monitoring procedures and mitigation actions.
- Noise emissions from the proposal should be considered against relevant guidelines including *Noise Policy for Industry* (EPA, 2017), *NSW Road Noise Policy* (DECCW, 2011), *Assessing Vibration: A Technical Guideline* (DEC, 2006).
- The Scoping Report states the applicant intends to assess the use against the draft *Port Noise Policy and Vessel Noise Operating Protocol*. The EPA recommends that DPIE considers the status of the policy once the application is lodged.

Air Quality

- Describe, characterise and quantify additional air emissions and cumulative impacts associated with the intensified use, including increased shipping and truck movements on site, and consider the impacts from dispersal of these air pollutants on the ambient air quality.
- Modelling, including dispersion modelling must be conducted in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (EPA, 2017) or a suitably

justified and verified alternative method based on current scientific understanding of atmospheric dispersion. Particular attention must be given to the verification of the method of predicting local air quality or meteorological conditions based on non-local or modelled data.

Should you require clarification of any of the above please contact Anna Timbrell on 9274 6345 or email anna.timbrell@epa.nsw.gov.au

Yours sincerely



ALEKSANDRA YOUNG
Unit Head – Regulatory Operations Metro South
Environment Protection Authority