



Our ref: DA-188611

Ms Diana Bozzetto
Group Manager - Sustainability
Cement Australia Pty Ltd
18 Station Avenue
Darra QLD 4076

Dear Ms Bozzetto

**Proposed Glebe Island Silos Throughput Capacity Increase
(DA-188611) – Lot 12 Sommerville Road, Rozelle**

Further to the Department's letter dated 5 April 2022 regarding the development application (DA) for the Glebe Island Silos Throughput Capacity Increase (DA-188611), please see attached (Attachment A) the Department's comments on the DA and Environmental Impact Statement (EIS).

The Department requests you provide a response to the comments and issues raised by the Department in addition to the public submissions and government agency advice forwarded to you on 5 April 2022.

If you have any questions, please contact Shaun Williams on (02) 8275 1345 or via email at shaun.williams@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "C. Ritchie".

8 April 2022

Chris Ritchie
Director
Industry Assessments

Enclosed:
Attachment A: Department's Comments on EIS

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Glebe Island Silos Throughput Capacity Increase (DA-188611)

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.
- 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.
- 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.

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.

Duration of Consent

- Section 3.3 of the EIS stipulates the site would likely be 'refined' in the future to enable to 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.

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.
- Further to the above, 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.

- 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 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.

Traffic and Transport

- 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.
- 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.

Noise Impacts

- 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.
- 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.