

22 July 2020

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CPo/JMc/TW

Jim Betts  
Secretary  
Department of Planning, Industry and Environment  
4 Parramatta Square, 12 Darcy Street  
Parramatta  
NSW 2150.

Attention: Shaun Williams (A/Senior Environmental Assessment Officer)

Dear Shaun,

## **GLEBE ISLAND SILOS, ROZELLE REQUEST FOR THE SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS**

On behalf of Cement Australia, we would like to request Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) in relation to a proposed increase to the currently approved maximum throughput for the cementitious material storage silos and related port facilities at Lot 12 DP1170710 on Sommerville Road, Rozelle (herein referred to as 'the site').

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 600,000 tonnes per annum, it is considered to be designated development. Please note that this is not designated development under Clause 7 (Cement Works) or Clause 14 (Concrete Works), as the site is only used for the unloading and storage of cementitious material, and does not contain, nor propose, any manufacturing activities.

Accordingly, the purpose of this letter is to request SEARs for the proposed development. To support the request for the SEARs this letter provides an overview of the proposed development, sets out the statutory context, and identifies the key likely environmental and planning issues associated with the proposal.

This letter is accompanied by a "Form A" Request for Secretary's Requirements for the preparation of an EIS (**Attachment A**).

## **1.0 Background**

### **Glebe Island Context**

The subject site consists of the westernmost 16 silos of the Glebe Island Silos (as described further in **Section 2.0**). These silos are currently used for the storage of cementitious material, with a permitted maximum throughput of 500,000 tonnes per annum in accordance with development consent 350/91, granted by the former Leichhardt Council on 16 October 1991. This application was subsequently modified in 2003, with approval granted by the Department of Planning.

**DA - Silo Strengthening Works**

DA 9985 for strengthening works to 12 of the existing silos used by Cement Australia was approved by the Department on 26 September 2019. The silo strengthening works are unrelated to this proposal to increase the maximum throughput capacity. The silo strengthening works are an important operational efficiency improvement that will be progressed irrespective of the ultimate throughput capacity for the facility.

**Modification DA - Temporary Increase**

DA 9967 submitted to DPIE for the temporary increase of 600,000 tonnes per annum for a maximum period of 18 months from the approval date of the Operational Environmental Management Plan. DA 9967 was subsequently approved by the Department on 29 November 2019.

**2.0 The Site**

The site is located at the Glebe Island facility in Sydney, as shown in **Figure 1**. The Glebe Island facility is part of the Bays Precinct, and is located approximately 2.3km west of the Sydney CBD. The subject site is the westernmost 16 silos of the Glebe Island Silos (shown in **Figure 1**), and the associated wharf-side facilities. The subject silos site is approximately 3,740m<sup>2</sup> in area and irregular in shape. The site is legally described as Lot 12 DP1170710. The registered owner is the Port Authority of New South Wales, and the site is currently leased and operated by Cement Australia.

The site features 16 of the total set of 30 silos which make up the complete Glebe Island Silos set (the remaining 14 silos are operated by Sugar Australia). In the lead up to the 2000 Olympic Games, the south-eastern and south western sides of the silos were painted to mimic Grecian columns and a structure was attached to the top of the silos to take advertising. The entire Glebe Island Silos are a heritage item assessed as having State significance, listed under the Port Authority of New South Wales’ Heritage Register (Inventory Number: 4560016), as per s170 of the *NSW Heritage Act 1977*. The silos are also a heritage item under Schedule 4, Part 3 (Item 1) of the *Sydney Regional Environmental Plan No 26 – City West (SREP 26)*. The silos are not listed on the NSW State Heritage Register.



**Figure 1 Site Plan**

Source: Nearmap & Ethos Urban



**Figure 2** Glebe Island Silos, looking north-west

Source: Ethos Urban

### 3.0 Description of Proposed Development

The development application will seek 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. As the physical infrastructure currently on site is capable of handling the proposed throughput, this application supports a more effective and efficient utilisation of the facility. It does not propose any physical works, nor any changes to current operating practices, including hours of operation.

### 4.0 Strategic Need

The Glebe Island Silos site is a crucial component of Sydney's construction industry, providing approximately 50% of Sydney's cement requirements. In recent times there has been an intensification in construction activities, with demand further increased by a range of state significant infrastructure projects. Infrastructure projects being supplied by Cement Australia (including through Glebe Island) include Westconnex, Northconnex, and Sydney Metro Stage 1 at current. Further large-scale projects are also in the pipeline, including Sydney Metro Stage 2, Westmead Hospital Redevelopment, Western Harbour Tunnel & Beaches Link, and the Western Sydney Airport.

To ensure that the current and future demand for cementitious products can continue to be met, and projects, including the key infrastructure projects listed above, can be continued and commenced without the time delays and cost increases which would arise from insufficient supply, this application seeks to increase the maximum approved throughput for the facility. It is noted that the physical capacity of the site is not increasing or changing, rather, 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.

## 5.0 Planning Context

### 5.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the assessment framework for development in NSW. Pursuant to Part 4 of the EP&A Act development consent is required for the proposed facility. Pursuant to Clause 4.10 of the EP&A Act and Clause 30 of Schedule 3 of the EP&A Regulation, the proposed development is classified as designated development which means that an EIS is required to support the development application for the proposal.

The relevant consent authority is the Minister for Planning, pursuant to Schedule 6, Clause 4 of the *State Environmental Planning Policy (State Significant Precincts) 2005*, because the proposed development is within the area identified as Glebe Island, has a capital investment value of less than \$10 million, and is being carried out by a party other than a public authority.

### 5.2 Environmental Planning and Assessment Regulation 2000

Clause 30 of Schedule 3 of the EP&A Regulation stipulates that shipping facilities constitute designated development if they meet the following criteria:

#### **30 Shipping facilities**

*Wharves or wharf-side facilities at which cargo is loaded onto vessels, or unloaded from vessels, or temporarily stored, at a rate of more than:*

- (a) 150 tonnes per day, or 5,000 tonnes per year, for facilities handling goods classified in the Australian Dangerous Goods Code, or*
- (b) 500 tonnes per day or 50,000 tonnes per year.*

As this development proposes to unload cementitious material from vessels and temporarily store it on site at a throughput rate of up to 1,200,000 tonnes per year, it is accordingly designated development under this clause.

As noted in the introduction, this proposal is not designated development under Clause 7 (Cement Works) or Clause 14 (Concrete Works), as the site is only used for the unloading and storage of cementitious material, and does not contain, nor propose, any manufacturing activities (a trigger for both of these clauses).

### 5.3 Protection of the Environment Operations Act 1997

The existing facility is subject of an Environment Protection Licence (EPL 4310) from the Environment Protection Authority (EPA), as it is a type of development listed in in clauses 6 and 37 of Schedule 1 of the POEO Act – being ‘Cement or lime works - cement or lime handling’ and ‘Shipping in bulk’, respectively. The EPA will need to vary EPL 4310 as a result of the proposed capacity increase. As such, the development application should be referred to the EPA, and assessed as ‘integrated development’ pursuant to Division 4.8 of the EP&A Act.

### 5.4 Other Planning Policies

In addition to the above, the following policies apply to the site and will need to be considered as part of the SSD application:

- *Sydney Regional Environmental Plan No 26—City West,*
- *State Environmental Planning Policy (State Significant Precincts) 2005,* and
- *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005.*

## 6.0 Overview of Likely Environmental and Planning Issues

Based on our preliminary environmental assessment, the following are the key environmental assessment issues that will need to be considered as part of the future DA.

### 6.1 Traffic Impact

As is currently the case, heavy vehicles will travel to the site to receive loads of cementitious materials, and will depart the site to carry those loads to customers. Vehicles will utilise the existing road network surrounding the site, and the existing infrastructure on the site to undertake these activities. A Traffic Impact Assessment will be provided as part of the EIS which will provide detailed analysis of trip generation, parking requirements, and access and circulation requirements and suitability. Preliminary analysis undertaken to date indicates that:

- **Trip Generation:** The theoretical peak traffic from the site in any given hour will not change as it is constrained by on-site weighbridge infrastructure that will not be expanded as part of the proposal. However, based on preliminary analysis of actual peak hour truck dispatch, the increase of up to 600,000 tonnes per annum throughput (over the currently approved 600,000 tonnes per annum), would create an additional 8 truck movements per hour in the AM Peak (16 movements per hour, being 8-in and 8-out), and an additional 5 truck movements per hour in the PM Peak (10 movements per hour, being 5-in and 5-out). It is noted that the infrastructure weighbridge limits the maximum number of trucks to 12 trucks per hour, being a total of 24 movements, with 12-in and 12-out. This equates to one additional truck every 7 minutes under a worst-case scenario in the peak periods, which is anticipated to have only minimal impact on levels of service at the relevant intersections.
- **Parking:** Given that the proposal will not increase the number of staff located on site, existing parking arrangements and quantities are not proposed to be changed.
- **Access and Circulation:** The existing infrastructure on site is considered appropriate and capable of managing the additional demand placed on the infrastructure by the increased truck movements. However, the Traffic Impact Assessment will consider the cumulative traffic issues associated with WestConnex, as well as proposals for uses within White Bay and Glebe Island port, such as the Port Authority's Multi-User Facility, Hanson's proposed concrete batching plant and aggregate import terminal, and the use of parts of the port area for construction and staging compound for other NSW Government infrastructure projects.

### 6.2 Air Quality Impact

As for the existing operations, the two key emissions sources are:

- **Dust emissions from site operations:** specifically, fugitive dust source emissions from vehicle movements and minor emissions due to de-dusted air from the bag filters; and
- **Emissions from ships:** specifically, those arising from the use of the on-board auxiliary engine and boiler while ships are berthed.

Preliminary analysis indicates that increased truck and ship activities are unlikely to cause a measurable difference to ground level concentrations of dust (PM<sub>10</sub> and PM<sub>2.5</sub>), NO<sub>x</sub>, and SO<sub>x</sub> at the nearest sensitive receptors. A detailed Air Quality Assessment will be provided as part of the EIS, which will include modelling of the air quality emissions from increased truck and ship activities. The Air Quality Assessment would also consider the emissions cumulatively, with particular reference to the emissions from the Port Authority's Multi-User Facility, and Hanson's proposed concrete batching plant and aggregate import terminal.

### 6.3 Noise Impact

A noise and vibration assessment will be included in the EIS, the assessment methodology will comprise of the following but it is not limited to the use of attended noise monitoring, assessment against the EPA's Noise Policy for Industry and Road Noise Policy and the draft Port Noise Policy and Vessel Noise Operating Protocol and noise modelling to assess noise impacts generated by the proposal.

Given the context of the site, receptors surrounding the site are generally marine and shipping-related in the immediate vicinity, and residential in the broader vicinity. The closest residential receptors are in Balmain, approximately 370m north of the silos, and 230m north of where the ships delivering material to the silos dock. Further residential receptors are located approximately 530m east of the silos and 640m east of the dock, in the Jacksons Landing development in the suburb of Pyrmont.

Noise from the Cement Australia facility would increase as a result of increased truck and ship activities, being:

- Increased number of ships visiting the facility, or ships carrying a larger load, increasing the overall number of days at which a ship is docked and unloading to the silos.
- Increased truck movements across any given day.

However, the maximum noise on any given day would not change as the peak level of activity on the site would not change on any given day throughout the year. As such, whilst the total number of peak noise days would increase during the year, the proposal will not significantly increase noise when measured over a 15-minute average, as the nature of activities over any 15-minute period will not change. There may be increases in 9-hour and 15-hour averaged noise levels, and these would be assessed in the noise and vibration assessment, including with consideration of cumulative noise impacts with other port activities.

Cement Australia understand that the Port Authority has developed a draft Port Noise Policy and Vessel Noise Operating Protocol to manage noise from ships at Glebe Island and White Bay. These have been developed in consultation with the EPA and DPI&E and are currently out on public exhibition until the 10 August 2020. Compliance with the forthcoming Port Authority's ship noise policy and Noise Precinct requirements would be enforced by way of the Lease Agreement between the Port Authority and Cement Australia for use of the shipping terminal and can be reinforced by way of suitable conditions of consent by the consent authority.

## 6.4 Heritage

It is noted that the entire Glebe Island Silos are a heritage item assessed as having State significance, listed under the Port Authority of New South Wales' Heritage Register (Inventory Number: 4560016), as per s170 of the *Heritage Act 1977*. The silos are also a heritage item under Schedule 4, Part 3 (Item 1) of the *Sydney Regional Environmental Plan No 26 – City West* (SREP 26).

The proposed increase to throughput does not propose any physical works, and will not have any impact on the heritage fabric, nor significance of the Silos.

## 6.5 Marine Navigation and Safety

A preliminary assessment of increased ship activities will be carried out as part of the EIS, including preliminary details of the frequency and vessel size for additional vessel movements, with consideration of marine structures, and pre-existing marine safety and navigation requirements of the Port Authority's Harbour Master. The proposal is estimating an annual increase of 18-20 movements from the current 20-32 ship movements, being up to 52 ship movements (of up to 24,000 tonnes).

## 6.6 Other Issues

As there are no physical works there are no environmental impacts to assess in relation to construction works or land disturbance, and there is no increase in the risk of discharges with potential to cause land and water pollution. No further assessment is considered to be warranted in relation to the following matters:

- Construction management
- Waste management
- Land contamination
- Water management
- Built form and visual impacts

- Lighting
- Utilities
- Building Code of Australia compliance
- Biodiversity
- Hazards and risks
- Sea level rise and climate change

## 6.7 Consultation

The following stakeholders have been identified for preliminary consultation:

- Port Authority
- The Glebe Island and White Bay Community Liaison Group
- The local community and other stakeholders
- The Office of Environment and Heritage
- Inner West Council
- NSW Environmental Protection Authority
- NSW Roads and Maritime Services

## 7.0 Conclusion

The purpose of this letter is to request the SEARs for the preparation of an EIS to increase the currently approved cementitious material throughput up to 1,200,000 tonnes per annum (an increase of up to 600,000 tonnes per annum).

This increase will ensure that cement supply can continue to meet the needs of the Sydney market (including supply for critical infrastructure projects), in a manner which will not have a detrimental impact on the surrounding area.

We trust that the information detailed in this letter is sufficient to enable the Secretary to issue the SEARs for the preparation of the EIS. Should you have any queries about this matter, please do not hesitate to contact me on (02) 9409 4954 or JMcbride@ethosurban.com.

Yours sincerely,



**James McBride**  
Associate Director  
0413 917 399  
JMcbride@ethosurban.com