

02 October 2019

Our Ref No: F2019/06354

Ms Sally Munk  
Principal Planning Officer  
Department of Planning, Industry and  
Environment  
320 Pitt Street  
SYDNEY NSW 2000

Dear Ms Munk,

**SALLY**  
**SUBJECT LAND:** 1891 Botany Road, Matraville

**APPLICATION NO:** SSD 10373

**PROPOSAL:** Proposed Botany Cogeneration Plant

I refer to the Department's request for Council's input into the draft SEARS (as emailed to Council on 2 October 2019) for the proposed Botany Cogeneration Plant at Matraville (SSD 10373). The following is Council's input into the draft SEARS:

#### **Community consultation/transparency**

Amend and add to point "1. Community Engagement" of the draft SEARs to include directions to address the following consideration:

- The environmental assessment should confirm how the monitoring data demonstrating air quality standard compliance will be communicated to the community and how this data would be publicly accessible via a real time website as per the Orica Groundwater treatment plant.

#### **Air Quality and Odour**

Amend and add to point "5. Air Quality and Odour" of the draft SEARs to include directions to address the following considerations:

- Cumulative impacts of the proposal on the surrounding environment given proximity to heavy industry located within Botany Industrial Park, Port Botany and the Airport.
- Strict constant monitoring of emissions to ensure compliance with safety standards.
- Clear protocols in the event that particulates exceed safety standards including independent third party checking.

#### **Human Health Risk**

Amend and add to point "6. Human Health Risk" of the draft SEARs to include directions to address the following:

- Consideration of the publicly available ANSTO Mascot aerosol sampling data to determine pre-existing background levels of fine particles at this location as it is more indicative of local air quality of the site than the NSW Government's Randwick site due to easterly coastal breeze influence.

<p><b>English</b></p> <p>If you need help to understand this letter, please come to Council's Customer Service Centre and ask for assistance in your language or you can contact the Telephone Interpreter Service (TIS) on 131 450 and ask them to contact Council on 1300 722 542.</p>	<p><b>Greek</b></p> <p>Αν χρειάζεστε βοήθεια για να καταλάβετε αυτή την επιστολή, παρακαλείστε να έρθετε στο Κέντρο Εξυπηρέτησης Πελατών της Δημαρχίας (Council Customer Service Centre) και να ζητήσετε βοήθεια στη γλώσσα σας ή τηλεφονήστε στην Τηλεφωνική Υπηρεσία Διερμηνίων (Telephone Interpreter Service — TIS) τηλ. 131 450 και να ζητήσετε να επικοινωνήσουν με τη Δημαρχία τηλ. 1300 722 542.</p>	<p><b>Italian</b></p> <p>Se avete bisogno di aiuto per capire il contenuto di questa lettera, recatevi presso il Customer Service Centre del Municipio dove potrete chiedere di essere assistiti nella vostra lingua; oppure mettetevi in contatto con il Servizio Telefonico Interpreti (TIS) al 131 450 e chiedete loro di mettersi in contatto col Municipio al 1300 722 542.</p>
<p><b>Croatian</b></p> <p>Ako vam je potrebna pomoć da biste razumjeli ovo pismo, molimo dodite u Općinski uslužni centar za klijente (Council's Customer Service Centre) i zatražite pomoć na svom jeziku, ili možete nazvati Telefonsku službu tumača (TIS) na 131 450 i zamoliti njih da nazovu Općinu na 1300 722 542.</p>	<p><b>Spanish</b></p> <p>A la persona que necesite ayuda para entender esta carta se le ruega venir al Centro de Servicios para Clientes [Customer Service Centre] de la Municipalidad y pedir asistencia en su propio idioma, o bien ponerse en contacto con el Servicio Telefónico de Intérpretes [“TIS”], número 131 450, para pedir que le comuniquen con la Municipalidad, cuyo teléfono es 1300 722 542.</p>	<p><b>Vietnamese</b></p> <p>Nếu quý vị không hiểu lá thư này và cần sự giúp đỡ, mời quý vị đến Trung Tâm Dịch Vụ Hướng Dẫn Khách Hàng của Hội Đồng Thành Phố (Council's Customer Service Centre) để có người nói ngôn ngữ của quý vị giúp hay quý vị có thể liên lạc Dịch Vụ Thông Dịch qua Điện Thoại (TIS) ở số 131 450 và yêu cầu họ liên lạc với Hội Đồng Thành Phố (Council) ở số 1300 722 542.</p>
<p><b>Polish</b></p> <p>Jeśli potrzebujesz pomocy w zrozumieniu treści tego pisma, przyjdź do punktu obsługi klientów (Customer Service Centre) przy Radzie Miejskiej i poproś o pomoc w języku polskim, albo zadzwoń do Telefonicznego Biura Tłumaczy (Telephone Interpreter Service — TIS) pod numer 131 450 i poproś o skontaktowanie się z Radą Miejską (Council) pod numerem 1300 722 542.</p>	<p><b>Indonesian</b></p> <p>Jika Anda memerlukan bantuan untuk memahami surat ini, silakan datang ke Pusat Pelayanan Pelanggan (Customer Service Centre) Pemerintah Kotamadya (Council) dan mintalah untuk bantuan dalam bahasa Anda, atau Anda dapat menghubungi Jasa Juru Bahasa Telepon (Telephone Interpreter Service - TIS) pada nomor 131 450 dan minta supaya mereka menghubungi Pemerintah Kotamadya pada nomor 1300 722 542.</p>	<p><b>Turkish</b></p> <p>Bu mektubu anlamak için yardıma ihtiyacınız varsa, lütfen Belediye'nin Müşteri Hizmetleri Merkezi'ne gelip kendi dilinizde yardım isteyiniz veya 131 450'den Telefonla Tercüme Servisi'ni (TIS) arayarak onlardan 1300 722 542 numaradan Belediye ile ilişkiye geçmelerini isteyiniz.</p>
<p><b>Hungarian</b></p> <p>Amennyiben a levél tartalmát nem érti és segítségre van szüksége, kérjük látogassa meg a Tanácsának Ügyfél Szolgálatát (Customer Service Centre), ahol magyar nyelven kaphat felvilágosítást, vagy hívja a Telefon Tolmács Szolgálatot (TIS) a 131 450 telefonszámon és kérje, hogy kapesolják a Tanácsához a 1300 722 542 telefonszámon.</p>	<p><b>Czech</b></p> <p>Jestliže potřebujete pomoc při porozumění tohoto dopisu, navštivte prosím naše Středisko služeb pro veřejnost (Council's Customer Service Centre) a požádejte o poskytnutí pomoci ve vaší řeči anebo zavolejte Telefonní tlumočnickou službu (TIS) na tel. čísle 131 450 a požádejte je, aby oni zavolali Městský úřad Randwick na tel. čísle 1300 722 542.</p>	<p><b>Arabic</b></p> <p>إذا أردت مساعدة لفهم هذه الرسالة، ترجوك الحضور إلى مركز خدمة عملاء المجلس واطلب المساعدة في لغتك، أو يمكنك الاتصال بخدمة الترجمة الهاتفية (TIS) على هاتف رقم 131 450 واطلب منهم الاتصال بالمجلس على رقم 1300 722 542.</p>
<p><b>Chinese</b></p> <p>如果你需要人幫助你了解這封信的內容，請來市政會顧客服務中心要求翻譯服務，或者與電話傳譯服務 (TIS) 聯係，號碼是 131 450 - 請他們幫助你打電話給市政會，號碼是 1300 722 542。</p>	<p><b>Russian</b></p> <p>Если Вам требуется помощь, чтобы разобраться в этом письме, то, пожалуйста, обратитесь в Муниципальный Центр Обслуживания Клиентов и попросите оказать Вам помощь на Вашем языке или же Вы можете позвонить в Телефонную Службу Переводчиков (TIS) по номеру 131 450 и попросить их связаться с Муниципалитетом по номеру 1300 722 542.</p>	<p><b>Serbian</b></p> <p>Ако вам треба помоћ да разумете ово писмо, молимо вас да дојете до Центра за услуге мештаријама при Општини (Customer Service Centre) и замолите их да вам помогну на вашем језику, или можете назвати Телефонску преводилачку службу (TIS) на 131 450 и замолите их да вас повежу са Општином на 1300 722 542.</p>

## **Traffic and Transport**

Amend and add to point “8. Traffic and transport” of the draft SEARs to include directions to address the following considerations:

- Details of all sources of cumulative traffic arising from port-related and industrial traffic.
- Details of ingress and egress arrangements of container trucks delivering solid fuel from Chullora (or any other source locations) to the proposed facility.
- Details of traffic management plans and measures to prevent truck movements associated with the development along non-designated routes including local residential streets.
- Details of measures to prevent detrimental impacts on any bike and active transport routes in the vicinity of the site.

## **Noise impacts**

Amend and add to point “9. Noise and vibration” of the draft SEARs to include directions to address the following considerations:

- The assessment of existing background noise levels in the local area and how they are already affecting sensitive receivers including residents to the east/northeast of the site. Continuous 24/7 noise from Orora and Port Botany operations are already affecting adjacent residents especially during night time hours and the NSW EPA has identified breaches in the night time noise policy in the local area. This local noise context needs to be taken into effect when considering and assessing cumulative noise impacts on surrounding sensitive receivers given the proposed 24/7 operation of the cogeneration plant.
- Details of appropriate use of a noise barrier along the eastern property boundary, to shield residential receptors from visual impacts and other construction amenity impacts. Council notes that use of containers as a noise/visual barrier was only to be a temporary measure for Orora and is not supported by Council as a long-term solution for noise/visual impact mitigation.

## **Flood risk**

Amend and add to point “10. Soils and water” of the draft SEARs to include directions to address the following consideration:

- Assessment of any tidal influences on overland flow paths and flooding risk affecting the development both on and off the site including Bunnerong Canal and Long Dam.

## **Hazard and Risk**

Amend and add to point “11. Hazard and Risk” of the draft SEARs to include directions to address the following considerations:

- Details of commissioning plant testing requirements should be outlined in the EIS to demonstrate how this will prove performance of technology and demonstrate compliance with the proposed air quality emission standards.
- Details of the technology that is proposed to be employed to capture and treat emissions before they leave the plant should also be included in detail.
- Details of ongoing requirements for monitoring and procedures for reporting breaches to pollution limits to appropriate regulatory authorities. Compliance with European standards as well as Australian standards (i.e., the Australian Paper Energy from waste plant at Maryvale, Victoria made the commitment to outperform the stringent European limits).
- The environmental assessment should clarify how incidents/emergencies will be managed/handled.

- Procedures for plant shutdown and what the contingency plans should be outlined to respond to and manage incidents, especially given that the plant technology cannot be easily shut down.

### **Visual Concerns**

Amend and add to point "12. Visual" of the draft SEARs to include directions to address the following considerations:

- A high quality architecture and design excellence approach for the proposed plant building and associated structures.
- Details of measures to stop the existing practice of using stacked containers as a visual barrier for the development.
- Details of landscape works that will complement and screen the development showing the use of high quality landscaping material and public domain/open space treatment.
- A detailed, accurate and survey-verified photo-montage based analysis of the visual impacts of the development and emission stack.

Council requests that the comments above be given due consideration and included into the draft SEARs.

Should you have any queries regarding this matter please contact me or David Ongkili, Coordinator Strategic Planning, on 90936793.

Yours sincerely



**Alan Bright**

**Manager Strategic Planning**