

15 February 2021

Our Ref: 21/38225  
Our Contact: Clare Harley on 9562 1607

Ms Sally Munk  
Principal Planning Officer – Industry Assessments  
Department of Planning, Industry, and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Ms Munk

**Re Bayside Council Submission to NSW Department of Planning, Industry, & Environment – Secretary’s Environmental Assessment Requirements (SEARs) for Cogeneration Plant (Residual Waste Fuel) at 1891 Botany Road, Matraville (SSD-10373)**

At the 13 November 2019 Council meeting, Bayside Council resolved to endorse the attached submission as Bayside Council’s submission on the SEARs for the proposed Cogeneration Plant at 1891 Botany Road, Matraville.

The Council resolution states:

- 1. That Council endorse the attached SEARs submission, and it be forwarded to the NSW Department of Planning, Industry, and Environment for consideration.*
- 2. That a more detailed submissions be prepared and reported to Council, once the Environmental Impact Statement is made publicly available from the NSW Department of Planning, Industry, and Environment.*

Attached version of our submission is provided for publishing to the website as Bayside’s response to the SEARs.

If you require any further information, please do not hesitate to contact Clare Harley, Manager Strategic Planning on 9562 1607.

Yours sincerely

*Clare Harley*

Clare Harley  
**Manager Strategic Planning**

**Postal address**

PO Box 21, Rockdale NSW 2216  
ABN 80 690 785 443

**Bayside Customer Service Centres**

Rockdale Library, 444-446 Princes Highway, Rockdale  
Westfield Eastgardens, 152 Bunnerong Road, Eastgardens

**E** [council@bayside.nsw.gov.au](mailto:council@bayside.nsw.gov.au)

**W** [www.bayside.nsw.gov.au](http://www.bayside.nsw.gov.au)

**T** 1300 581 299 | 02 9562 1666

**BAYSIDE COUNCIL SUBMISSION ON  
STATE SIGNIFICANT DEVELOPMENT  
BOTANY COGENERATION PLANT  
1891 BOTANY ROAD, MATRAVILLE  
(SSD-10373)**



## Introduction

Bayside Council understands this SSD is for the construction and operation of a cogeneration plant with a capacity to process up to 165,000 tonnes per annum of residual waste fuel. The site exists wholly within the Randwick Local Government Area (LGA), however, is in close proximity to the Bayside LGA.

This submission provides feedback on the detail of the proposed development and management of key issues, as should be identified in the SEARs, and satisfied in the future Environmental Impact Statement (EIS).

The proposed Plant has a capital investment value of approximately \$220 million. As such, the proposal meets the capital investment value threshold for State Significant Development (SSD) set out under Clause 4.36 of the Environmental Planning and Assessment Act 1979, and the provisions set out in Clause 20 of Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011 (the SEPP).

Clause 20 of Schedule 1 of the SEPP relates to development for the purpose of cogeneration of heat and electricity using waste as an energy source, that has a capital investment value of more than \$30 million.

SUEZ prepared a Scoping Report to support the request for Secretary's Environmental Assessment Requirements (SEARs) for the proposal. The issued SEARs were informed by the proponent's Scoping Report, and the Environmental Impact Statement (EIS) will need to respond to, and satisfy, the SEARs.

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## Background

### Site Meeting 24 July 2019

The Department of Planning, Industry and Environment (DPIE) held a planning focus meeting on site on the 24 July 2019 with the Applicant, its consultants, and relevant government authorities to discuss and assist the DPIE in formulating the Secretary's Environmental Assessment Requirements (SEARs) for the development. Bayside Council Officers attended this meeting and requested the following issues be considered:

- Traffic and Transport - It was requested that details be provided on the traffic routes the trucks would be taking, and it was requested that trucks remain on RMS roads, i.e. Foreshore and either M5, or Southern Cross Drive. It was advised that trucks are not to utilise the local street network, and that Denison Street and Wentworth Ave should not be considered as alternative routes for truck movements, as the intersections at Baker Street and Page Street were already at capacity.
- Dangerous Goods - Details were requested on any dangerous goods to be transported through the Bayside LGA, and again that trucks only use designated RMS routes.
- Hazard Risk - It was requested that the proponent and DPIE consider the impacts of the Hazard Risk Assessment for the Botany Industrial Park be addressed in the EIS, and whether this had any cumulative impact on the area.

- Noise Emissions - It was requested that noise testing be done within the Bayside LGA, as noise from the Ports area travels (mainly at night) and can be heard in the residential areas of the Bayside LGA.
- Air Quality: It was requested that cumulative assessment be carried out, and the Bayside LGA be included.
- Biodiversity – The site is located only 1.5 km away from the Sir Joseph Banks Park (SJBPA), which is rich in Biodiversity values, including sites with threatened species and migratory birds.

## Secretary's Environmental Assessment Requirements (SEARs)

On 12 September 2019, the Department of Planning, Industry and Environment issued the draft Secretary's Environmental Assessment Requirements (draft SEARs). Council received this notification late, on 2 October 2019.

DPIE confirmed to Council that it was possible to amend the SEARs at any stage (if DPIE deem any concerns of Council to be justified), despite the SEARs already having been issued.

## Summary of Key Issues – Issued SEARs

The key environmental assessment issues identified for more detailed assessment during the preparation of the EIS included:

- Air quality and odour management, in relation to emissions from the operation of the Project with consideration to background ambient conditions
- Health risks associated with air emissions during the operational phase of the Project
- Compliance with the NSW Energy from Waste Policy Statement during design and operation
- Waste generation in relation to the types and quantities of waste generated during the construction and operation of the Project, including re-use and/ or disposal options for bottom ash and flue gas treatment residues
- Traffic and transport in relation to potential impacts to the road network from construction and operational traffic
- Visual and landscape character impacts as a result of the introduction of new built form
- Hazard and risk in relation to fire and the storage, handling, transportation and disposal of flue gas treatment residues generated from the operation of the Project
- Social and economic impacts, including the potential benefits relating to increased employment opportunities, and amenity impacts
- Noise and vibration from construction and operational activities and potential impacts to sensitive receivers
- Soil and water impacts in relation to contamination, stormwater and wastewater management during construction and operation, and erosion and sedimentation control during construction
- Aircraft safety risk due to plume rise from the vent stack
- Greenhouse gas emissions generated by the Project
- Sustainability in design
- Cumulative impacts during construction and operation
- Heritage impacts, both in relation to Aboriginal and non-Aboriginal heritage
- Biodiversity including potential impacts to threatened species

Bayside Council intends to prepare and submit a report on the EIS, as part of the community consultation process administered by DPIE, once a full suite of studies (prepared against the issued SEARs) is made available for public comment.

***As adopted by Council resolution dated 13 November 2019***

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