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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



Manod Wickramasinghe

TRAFFIC AND TRANSPORT PLANNING MANAGER