



Transport
for NSW

Mr Cameron Sargent
Team Leader
Key Sites Assessments
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Ellen Mannix

Dear Mr Sargent

**Request for SEARs – Sydney Fish Markets – Main Works - SSD 8925 1A, 1B & 1C
Bridge Road, Glebe, Sydney**

Thank you for your letter dated 24 November requesting Transport for NSW (TfNSW) provide input to the Secretary's Environmental Assessment Requirements (SEARs) for the above State Significant Development (SSD).

The suggested additions and changes to the draft SEARs are provided in track changes in the attached draft SEARs for the above SSD.

If you require further clarification regarding this matter, please don't hesitate to contact Lee Farrell, Transport Planner, 8265 9943.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Mark Ozinga'.

11/12/17

Mark Ozinga
**Principal Manager, Land Use Planning and Development
Freight, Strategy and Planning**

Objective Reference CD17/13075

Secretary's Environmental Assessment Requirements

Section 78A(8) of the *Environmental Planning and Assessment Act*
 Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*

Application Number	SSD 8925
Proposal Name	Sydney Fish Markets – Stage 2 main works proposal
Location	1A, 1B & 1C Bridge Road, Glebe, Sydney
Applicant	UrbanGrowth NSW Development Corporation
Date of Issue	TBC
General Requirements	<p>The Environmental Impact Statement (EIS) must address the <i>Environmental Planning and Assessment Act 1979</i> and meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i>.</p> <p>Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development.</p> <p>Where relevant, the assessment of the key issues as listed below, and any other significant issues identified in the risk assessment, must include:</p> <ul style="list-style-type: none"> • adequate baseline data • justification of impacts • consideration of potential cumulative impacts due to other development in the vicinity • measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment. <p>The EIS must also be accompanied by a report from a qualified quantity surveyor providing:</p> <ul style="list-style-type: none"> • a detailed calculation of the capital investment value (CIV) of the development (as defined in clause 3 of the <i>Environmental Planning and Assessment Regulation 2000</i>), including details of all assumptions and components from which the CIV calculation is derived • an estimate of the jobs that will be created by the development during construction and operation • verification that the CIV was accurate on the date that it was prepared.
Key issues	<p>The EIS must address the following specific matters:</p> <ol style="list-style-type: none"> 1. Environmental Planning Instruments (EPIs), policies and guidelines <ul style="list-style-type: none"> • The relevant statutory provisions contained within the applicable EPIs and Development Control Plans including: <ul style="list-style-type: none"> ○ State Environmental Planning Policy (State & Regional Development) 2011 ○ State Environmental Planning Policy (State Significant Precincts) 2005 ○ State Environmental Planning Policy No. 26 – City West ○ State Environmental Planning Policy (Infrastructure) 2007 ○ State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) ○ Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 ○ Draft State Environmental Planning Policy – Environment

- Draft State Environmental Planning Policy - Infrastructure
- Sydney Local Environmental Plan 2012
- Sydney Harbour Foreshores and Waterways Area DCP 2005
- The relevant provisions, goals and objectives in the following:
 - *NSW State Priorities*
 - ~~NSW Long Term Transport Master Plan~~
 - *NSW Planning Guidelines for Walking and Cycling*
 - *Better Placed – An integrated design policy for the built environment of New South Wales*
 - *Development Near Rail Corridors and Busy Roads - Interim Guideline*
 - *Guide to Traffic Generating Developments (RMS)*
 - *Guide to Traffic Management – Part 12: Traffic Impacts of Development (AUSTROADS)*
 - *A Plan for Growing Sydney*
 - *Towards our Greater Sydney 2056*
 - *Draft Eastern City District Plan*
 - *Sustainable Sydney 2030*
 - *Draft Future Transport Strategy 2056 and supporting plans*
 - *NSW Freight and Ports Plan 2013*
 - *Sydney's Light Rail Future*
 - *Sydney's Ferry Future*
 - ~~Sydney's Bus Future 2013~~
 - ~~Sydney's Walking Future 2013~~
 - ~~Sydney's Cycling Future 2013~~
 - *The Bays Precinct Sydney: Transformation Plan.*

2. Strategic context and concept development application

- Consider the proposal in the context of the work being undertaken for the Bays Market District (BMD) nominated as a State Significant Precinct.
- Consider the proposal in the context of the proposed changes to the State Environmental Planning Policy (State & Regional Development) 2011, State Environmental Planning Policy No.26 – City West and Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 and Draft State Environmental Planning Policy – Environment.
- Demonstrate how the proposal is consistent with the Concept Development Application (SSD 8924) including any relevant Statement of Commitments.

3. Design excellence

- Demonstrate how the proposal achieves design excellence in accordance with the Design Excellence Strategy prepared in consultation with the NSW Government Architect.

4. Built form and urban design

- Provide a detailed design analysis of the proposed development with reference to the building form, height, setbacks, bulk and scale in the context of the immediate locality, the wider area, and the desired future character.
- Demonstrate how the proposal will achieve an optimal design and amenity outcome with specific consideration of the site's character, layout, setbacks, amenity, views and vistas, open spaces and public domain, connectivity and street activation.
- Outline potential design considerations aimed at mitigating any impacts identified.
- Provide a detailed description, analysis and justification of all proposed land uses including gross floor area calculations.

5. Scenic quality and visual impacts

- Provide a detailed Visual Impact Assessment in accordance with the Plans & Documents section. The Visual Impact Assessment must provide a detailed analysis of the proposal's impacts on the scenic quality of the foreshore and justification for these impacts having regard to the unique

- qualities and natural assets of Sydney Harbour.
- The Visual Impact Assessment must also identify the following:

- important sight lines and visual connectivity to and through the site
- visual changes and view impacts of the proposal to/from key vantage points including, but not limited to, Wentworth Park, Anzac Bridge, Bank Street, Blackwattle Bay Park and various locations along the existing and future Sydney Harbour foreshore.

6. Public domain and public access

- Provide detail on the interface between the proposed development and the public domain, street activation, harbour foreshore and other surrounding development.
- Identify the proposed public domain including key vehicular, bicycle and pedestrian access points and links to other public domain spaces, including Wentworth Park, **Sydney CBD** and the existing and future Harbour foreshore.
- Provide detail on specific design features (where applicable):
 - footpaths and pavements, roads and/or rights of carriageways
 - outdoor seating
 - materials and finishes
 - public art
 - furniture and fixtures
 - street lighting, pedestrian lighting and feature lighting
 - edges, screens, balustrading and fences
 - walls, embankments and mounds
 - steps, ramps, vehicle crossings, decks and pathways
 - civil and stormwater infrastructure
 - tree planting
 - mass planting beds, planter boxes and individual plantings
 - bicycle parking **and end-of-trip facilities**

7. Amenity

- Provide a solar access analysis and shadow diagrams outlining impacts on adjoining developments and spaces (including Wentworth Park).
- Provide a wind impact report.
- Demonstrate how the proposal maintains the amenity of surrounding development, including potential overshadowing, privacy and view impacts.

8. Transport, traffic, parking and access

- Demonstrate consistency with the Concept Development Application (SSD 8924) Transport and Traffic Impact Assessment.
- Provide detailed plans, including civil engineering plans, of the proposed road network.
- **An indicative concept plan of likely land uses, including an estimate of gross floor areas and site accesses**
- **Prepare a Travel Plan, including intended actions, monitoring, review and implementation as well as responsibilities for implementation and detailing all modes of transport available to visitors and employees of the site.**
- A Transport and Traffic Impact Assessment is to be prepared in accordance with the relevant guidelines identifying:

Operation

- **Definition of a study area to be agreed by TfNSW and RMS**
- the current daily and peak hour traffic generation (~~light and heavy vehicle~~), public transport, walking and cycling movements and existing traffic and transport facilities located within the vicinity of the proposed development
- **the estimated traffic generated by heavy vehicles during operation including forecast movement of heavy vehicles across a 24 hour period (early morning, AM peak, interpeak, PM peak, night) and details of proposed vehicle types**
- the estimated daily and peak hour traffic generation (light and heavy vehicle), **Point to Point Transport**, public transport, walking and cycling trip generation during operation. **Trip generation rates are to be**

supported by appropriate modelling and analysis to the satisfaction of RMS

- Benchmarking the trip generation of the residential component of the development by undertaking trip generation surveys for a site of similar scale and geographic context
- Undertake a trip generation survey of the Fish Markets, which is used as one of the tools to forecast the future trip generation of the site.
- Develop a traffic model to determine improvements to the road network required to support the proposal, (scope, parameters and methodology to be agreed with Roads and Maritime Services and to be carried out in accordance with RMS Traffic Modelling Guidelines 2013)
- Develop an appropriate framework including potential inputs from strategic modelling to identify and validate required improvements to support the uplift in demand and target behaviours.
- a staging plan for all proposed civil infrastructure works
- the cumulative traffic impacts of existing, approved and planned developments in the area including the impact of traffic generated on nearby intersections and any road infrastructure works required
- an assessment of predicted impacts on road, pedestrian, cyclist and maritime safety and mitigation for any safety issues
- the adequacy of existing and future public transport (including Sydney Metro West and ferry services), pedestrian and bicycle provisions to meet the demand of the proposed development, including access and connections to these
- and proposals for modifications to maintain an acceptable level of access and performance of these systems

- the existing and future performance of key intersections providing access to the site, and any required upgrades (roads/intersections)
- the proposed pedestrian and bicycle routes including end-of-trip facilities for workers and visitors as well as measures to maintain road and personal safety in accordance with CPTED principles
- access to and from the site from the road network including intersection locations, design and sight distance (i.e. turning lanes, swept paths, sight distance requirements) detailed plans of the proposed site layout and design, including access to and from the site from the road network, the internal road network, truck marshalling, truck queuing, turning path diagrams depicting vehicles entering, exiting and maneuvering through the site, staging, swept path analysis for entry/exit to site and for intersections, sight distance requirements, driver facility areas and parking provision on-site in accordance with the relevant Australian Standards
- proposed access arrangements including service vehicles, emergency vehicles and loading areas for the development including management of queueing of service vehicles at peak delivery times
- details of any other potential events. Outline how these seasonal peaks and potential events will be managed from a transport perspective, including parking management
- any proposed physical, access, maintenance, operational, urban design and heritage (if applicable) impacts on RMS assets that form part of the proposal must involve consultation with and must be approved by RMS.
- proposed car parking
- details of car parking event management for peak periods, including Christmas and Easter periods.
- Measures to encourage sustainable travel and non-car mode share, (e.g. implementing a sustainable travel plan and end of trip facilities) during construction and operation.

Construction

- preparation of a Construction Pedestrian Traffic Management Plan that includes an assessment of traffic and transport impacts during construction and how these impacts will be mitigated for any associated traffic, pedestrians, cyclists
- details of construction vehicle routes, truck numbers, peak hour and daily movements, hours of operation, site compound locations, access arrangements and traffic control measures during construction
- an assessment of construction impacts on road safety at key intersections and locations for potential pedestrian, vehicle and bicycle conflicts
- an assessment of demolition/construction impacts on maritime safety in the bay and a management plan to mitigate risks of incidents
- assessment of cumulative impacts associated with other construction activities in the area
- temporary cycling and pedestrian access during construction
- access arrangements for workers, emergency services and the provision for safe and efficient access for loading and deliveries including the existing and proposed on-street parking.
- Description of vehicle access routes used to access key freight locations/routes and the impact on nearby intersections, vehicle type and likely arrival and departure times
- Detailed plans of the proposed site layout, including access to and from the site from the road network, the internal road network, truck marshalling, turning path diagrams depicting vehicles entering, exiting and maneuvering through the site, staging, driver facility areas and parking provision on-site in accordance with the relevant Australian Standards

9. Maritime navigation

- Provide a Navigation Impact Assessment (NIA) to address the impacts of the development and wharves on the navigation of bulk carriers, cruise ships, ferries and commercial/recreational and other maritime vessels **including the implementation of mitigation measures.**

10. Biodiversity

- Provide an updated Marine Ecology Report to assess the ecological impact (including potential impacts of shading) of the proposed development and wharf structures on any flora and fauna, including threatened species, population or communities (e.g. *Psodonia seagrass*) or their habitats.
- Provide an updated Biodiversity Development Assessment Report (BDAR) prepared in accordance with the *Biodiversity Assessment Method* to assess the impacts of the proposed development on biodiversity. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under Section 6.10 of the *Biodiversity Conservation Act 2016*. The BDAR is to address Section 6.12 of the *Biodiversity Conservation Act 2016*, Section 6.8 of the *Biodiversity Conservation Regulation 2017*, the *Biodiversity Assessment Method* and the following:
 - details of the measures proposed to address the offset obligation
 - the total number and classes of biodiversity credits required to be retired for the development/project
 - the number and classes of like-for-like biodiversity credits proposed to be retired
 - any proposal to fund a biodiversity conservation action
 - any proposal to make a payment to the Biodiversity Conservation Fund.

- If requesting the application of the variation rules under Section 6.4 of the Biodiversity Conservation Regulation 2017, the BDAR must contain details of what reasonable steps have been taken to attempt to obtain the required like-for-like biodiversity credits.
- 11. Heritage and archaeology**
- Provide a Heritage Impact Statement prepared by a suitably qualified heritage consultant to address the impacts of the proposal on any heritage and archaeological items within the site and/or surrounding the area. The Statement is to include strategies to minimise or mitigate any impacts on heritage significance.
 - The HIS is to include management strategies for any potential maritime heritage including shipwrecks, previous maritime infrastructure, archaeological items and/or relics (both above and below water) that may be impacted by the proposal, including strategies and procedures for the unexpected discovery of heritage items and/or relics.
- 12. Water quality and contamination**
- Provide an updated water quality impact assessment to address the impacts of the development on the water quality of Sydney Harbour. The report is to provide the following:
 - an assessment of the geotechnical and contamination issues associated with the proposed sediment disturbance
 - an assessment of potential cumulative impacts on water sources
 - prevention strategies of potential water contamination during construction
 - the management strategies to be employed during marine works to minimise or mitigate any impacts
 - details of the proposed water quality monitoring program including technological details and data of any surface and groundwater modelling
 - the management of sewerage waste from vessels, fuel and chemical storage and spill management.
 - Demonstrate compliance with the requirements of State Environmental Planning Policy 55 – Remediation of Land.
 - Provide detail on how the existing structures will be decommissioned and how any de-contaminating processes are to be managed during this process.
- 13. Noise and vibration**
- Provide an updated noise and vibration assessment in accordance with the relevant EPA guidelines that addresses the following;
 - the impact of noise and vibration associated with construction, operation and traffic
 - the cumulative noise and vibration impacts from concurrent surrounding activities during construction and operation
 - any potential noise and vibration impacts (construction and operation) on nearby noise sensitive receivers and the proposed monitoring procedures
 - mitigation measures to minimise potential noise and vibration impacts during construction and operation.
- 14. Air quality and odour**
- Provide an updated air quality impact assessment to address the impacts of construction and operation on air quality in accordance with the relevant Environment Protection Authority guidelines.
 - Identify the key air emission generating sources and activities from the proposed construction and operation.
 - Identify measures to minimise and mitigate potential air quality and odour impacts on surrounding development.

	<p>15. Water hydrology and sea level rise</p> <ul style="list-style-type: none"> <input type="checkbox"/> Provide a stormwater, drainage and flooding assessment to address the impacts of the development on water hydrology including potential flooding, wave movements and mitigation measures. <input type="checkbox"/> Include an assessment of the risks associated with sea level rise on and from the development. <p>16. Sediment, erosion and dust controls</p> <ul style="list-style-type: none"> <input type="checkbox"/> Provide details on the measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and particles. <input type="checkbox"/> Provide details of the proposed piling and how this will be constructed within the seabed. <p>17. Waste</p> <ul style="list-style-type: none"> <input type="checkbox"/> Provide an assessment of the waste impacts and their management during construction and operation. <p>18. Construction impacts</p> <ul style="list-style-type: none"> <input type="checkbox"/> Provide a Construction Environmental Management Plan for that includes the following: <ul style="list-style-type: none"> o community consultation, notification and complaints handling o impacts of construction on adjoining development and proposed measures to mitigate construction impacts o noise and vibration impacts on and off site o air quality impacts on the neighbourhood o odour impacts o water quality management for the site o construction waste classification, transportation and management methods in accordance with DECCW's Know Your Responsibilities: Managing Waste from Construction Sites Guideline. <p>19. Building Code of Australia</p> <ul style="list-style-type: none"> <input type="checkbox"/> Provide a BCA report, access report and fire safety assessment demonstrating compliance with the BCA. <p>20. Safety</p> <ul style="list-style-type: none"> <input type="checkbox"/> Provide a Crime Prevention Through Environmental Design Report. <input type="checkbox"/> Provide detail on the measures to ensure the safety of visitors and workers within the development and the surrounding public domain. <p>21. Ecologically Sustainable Development (ESD)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Provide detail of how best practice ESD principles (as defined in clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000) will be incorporated in the design, construction and ongoing operation phases of the development. <p>22. Utilities and infrastructure</p> <ul style="list-style-type: none"> <input type="checkbox"/> Address the existing capacity and any required upgrades of utilities, including staging of infrastructure and any additional licence/approval requirements in consultation with relevant agencies. <p>23. Developer contributions</p> <ul style="list-style-type: none"> <input type="checkbox"/> Provide the scope of developer contributions proposed. <p>24. Consultation</p> <ul style="list-style-type: none"> <input type="checkbox"/> Undertake an appropriate level of consultation with Council and State Government agencies.
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	<ul style="list-style-type: none"> • Provide details of the consultation activities undertaken in preparation of the application consistent with the Concept Development Application Consultation and Community Engagement Strategy.
Consultation	<p>During the preparation of the EIS, the applicant must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular, consultation is required for the following agencies:</p> <ul style="list-style-type: none"> • City of Sydney Council • NSW Government Architect's Office • NSW Roads and Maritime Services • Transport for NSW • NSW Office of Environment and Heritage • NSW Department of Primary Industries • Environment Protection Authority • Sydney Water • The Port Authority of NSW • NSW Police • Infrastructure NSW • Destination NSW • Local Aboriginal Land Council and stakeholders • Local Heritage Group/s, if relevant • Relevant commercial fishing groups • Relevant recreational groups including fishing, boating, rowing and dragon boating <p>The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p>
Further consultation after 2 years	<p>If you do not lodge a development application and EIS for the development within 2 years of the issue date of these SEARs, you must consult further with the Secretary in relation to the preparation of the EIS.</p>
References	<p>The assessment of the key issues listed above must consider the relevant guidelines, policies, and plans. While not exhaustive, the following attachment contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this proposal.</p>

Plans & Documents

Plans and Documents

The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the *Environmental Planning and Assessment Regulation 2000*. These are to be provided as part of the EIS rather than as separate documents.

In addition, the EIS must include the following:

1. **An existing site survey plan** drawn at an appropriate scale illustrating:
 - the location of the land, boundary measurements, area (sqm) and north point
 - the existing levels of the land in relation to buildings and roads
 - location and height of existing structures on the site
 - location and height of adjacent buildings
 - all levels to be to Australian Height Datum (AHD).
2. **A locality/context plan** drawn at an appropriate scale indicating:
 - significant local features such as parks, community facilities and open space and heritage items
 - the location and uses of existing buildings, open space, wharves and employment areas
 - traffic and road patterns, pedestrian routes and public transport nodes.
3. **Drawings at an appropriate scale** illustrating:
 - detailed plans, sections and elevations (at a minimum scale of 1:200)
 - the height (AHD) of the proposed building envelope in relation to the land and any changes that will be made to the level of the land by excavation, reclamation or otherwise
 - the location and uses of existing buildings and structures within the site and surrounding area.
4. **Landscape plan** showing the landscape treatment of the development and public domain.
5. **Shadow diagrams** showing:
 - overshadowing of the proposed development during the summer solstice (Dec 21), winter solstice (June 21) and the equinox (March 21 and September 21) at 9.00am, 12.00 noon, and 3.00pm
 - solar access to the site and any surrounding residential developments during the summer solstice (Dec 21), winter solstice (June 21) and the equinox (March 21 and September 21) at 9.00am, 12.00 noon, and 3.00pm.
6. **Visual Impact Assessment**
 - The visual impact assessment, including focal lengths, must be done in accordance with Land and Environment Court principles and is to provide the following information:

Visual assessment methodology

- A flow-chart indicating how the analysis is to be undertaken, or a narrative description of the proposed sequence of activities.
- An explanation and justification for the criteria for assessment relevant to the site, local context and proposed built form and public domain outcomes. Criteria must include reference to the planning framework.
- A definition and explanation of the visual catchment should be defined (see below).
- An assessment matrix including number of viewers, period of view, distance of view, location of viewer to determine potential visual impact - i.e. high, medium or low.

	<p><u>Visual catchment</u></p> <ul style="list-style-type: none"> • Potential visual catchments and view locations, including contours (areas from which the development is visible) are to be identified. • Categories of views (e.g. from public open space, from key streets, from main buildings and from key heritage items) are to be defined. • Photos are required for representative view categories, plotted on a map. <p><u>Visual material</u></p> <ul style="list-style-type: none"> • Reference to be made to site analysis. • Assessment must benchmark against the existing situation with the proposed plans. • Provide key plan indicating where viewpoints are located and narrative explaining why these have been selected. • The built form should be illustrated in the context of the visual catchment to enable assessment of the visual impact. • The location of cross-sections should be clearly shown on a key plan and the choice of positions explained. The cross sections should be shown in the context of the visual catchment and drawn to realistic scales and shown in context. • Vertical exaggeration should provide an accurate rather than 'flattened' impression of buildings in the context of the visual catchment. • Photomontages to be provided for key viewpoints from all directions, and from several positions within the visual catchment. A key plan is to show the locations of these photomontages with supporting documentation to explaining the choice of these locations. Photomontages should be provided for close as well as distant views. <p>A comparison of 'before' and 'proposed' is fundamental to a visual impact assessment, therefore the visual impact assessment (A3 in size) should be undertaken using human eye focal lengths (50mm at 35mm FX format and 46° angle of view) from long range, medium range and short range positions so that they can be assessed with respect to visibility, visual absorption capacity and visual impact rating.</p>
<p>Documents to be submitted</p>	<ul style="list-style-type: none"> • 1 hard copy and 1 electronic copy of all the documents and plans for review prior to exhibition. • 5 hard copies and 14 electronic copies of the documents and plans (once the application is considered acceptable). Electronic copies of the documentation must be on a USB with documents in PDF format with file sizes not exceeding 5Mb. The hard copies should include plans printed in A3. One additional A1 set of plans may also be provided.

