



Our Ref: DOC18/530267

Ms Sally Munk
Principal Planner
Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

By email: sally.munk@planning.nsw.gov.au

Dear Ms Munk

RE: Exhibition of modification request for Boral St Peters Concrete Batching Plant and Material Handling Facility (DA 14/96 MOD 11)

I refer to your email dated 30 July 2018 inviting comments from the Heritage Council of NSW and advice on recommended conditions for the above noted Development Application to modify Boral St Peters Concrete Batching Plant and Materials Handling Facility located at 25 Burrows Road South, St Peters.

It is noted that the original application (DA 14/96) for construction and operation of a concrete batching plant and construction materials handling facility at the site was approved by the Minister under Part 3A of the EP&A Act on 6 September 1996. Several modification applications (MOD 1 – MOD 10) were approved subsequently.

The current modification seeks approval to:

- upgrade the concrete batching plant to facilitate an increase in concrete production from 280,000 cubic metres per annum to 750,000 cubic metres per annum;
- make changes to the layout and function of the materials handling facility to facilitate an increase in throughput from 760,000 tonnes per annum to one million tonnes per annum; and
- construct a new aggregate reclaiming conveyor, upgrade the site's surface water management system and install a second weighbridge.

It is noted that the Alexandra Canal is the closest State Heritage Register listed item (SHR No 01621) in relation to the subject land.

The Environmental Assessment (EA) prepared by EMM dated 4 July 2018 has been reviewed. It is noted that the SEARSS issued for the application included the following requirement for heritage:

Heritage, including a statement of heritage impact which considers any impact the proposal might have on Alexandra Canal and any other items within the vicinity.

The EA notes that the heritage impacts were considered as part of the EIS that accompanied the original DA in 1996. However, this assessment was undertaken prior to the Alexandra Canal being listed on the SHR in 2002. The EA does not provide an adequate heritage assessment of the impacts of the modified proposal on the SHR listed values of the Alexandra Canal. The EA has indicated that the site has been highly modified due to years of

the existing and already approved industrial activity both within the site and its immediate surrounds. The EA notes the impacts of the proposal would result in an increase in traffic associated with concrete transport, however it would not result in significant changes to the site at both a visual and aesthetic level. The supporting heritage assessment does not raise or address the question of vibratory impacts to the SHR item from increased traffic. The EA's assessment on the vibration impacts did not consider a standard relevant to heritage structures. The Division understand an appropriate standard may be e.g. *German Standard DIN 4150-3 Structural Vibration*, however the EA only applies the standard identified in existing EPA Guidelines. Additional information should be supplied to amend the EA to consider whether there would be increased vibratory impacts to the SHR item as a result of the modification. If this is likely, proposed mitigation should be provided with advice on how, if any, monitoring of the item for any changes to the acceptable levels would be undertaken as a result of this project.

It is recommended that the EA should also be updated to include a more detailed and comprehensive assessment of the likely impacts that the proposed modification may have on the SHR listed Alexandra Canal and any other heritage items in the vicinity. The current report is not consistent with the Heritage Council of NSW guideline for preparing a Statement of Heritage Impact.

Consultation with local councils is recommended to mitigate any impacts to local heritage items in the vicinity of the affected area and visual amenities associated with the project.

If you have any questions regarding the above advice, please contact Shikha Jhaldiyal, Senior Heritage Assessment Officer, Heritage Division, Office of Environment and Heritage, at email shikha.jhaldiyal@environment.nsw.gov.au or on telephone: 9873 8545.

Yours sincerely



15/08/2018

Katrina Stankowski
Senior Team Leader
Heritage Regional Assessments, North
Heritage Division
Office of Environment & Heritage
As Delegate of the NSW Heritage Council