



04 February 2022

Department of Planning and Environment  
Place Design and Public Spaces  
4 Parramatta Square Parramatta  
Attention: Amy van Den Nieuwenhof  
Email: [amy.vandenNieuwenhof@dpie.nsw.gov.au](mailto:amy.vandenNieuwenhof@dpie.nsw.gov.au)

Dear Amy,

Thank you for the opportunity to comment on the draft Pyrmont Peninsula sub-precinct master plans and draft planning controls that are currently on public exhibition and provided to the Environment Protection Authority (EPA) for comment on 26 November 2021.

The EPA provides the following comments (**Attachment A**) for consideration. These comments relate to the following matters:

- Air quality and odour
- Noise
- Contaminated land
- Water quality.

Should you require any further information, please contact Sarah Deards (02) 9995 6816.

Sincerely

A handwritten signature in black ink that reads 'S. Deards'.

Sarah Deards  
Unit Head, Strategic Planning Unit  
Environment Protection Planning

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Attachment A

## Attachment A

### Air Quality and Odour

The Air Quality Review is focussed on the Cross City Tunnel Stack (CCTS) as the primary source of concern for the Pyrmont Peninsula. A high level review of other emission sources has also been undertaken.

- The EPA notes that the cumulative impact of all air emission sources should be considered throughout the planning process and specifically be considered at each specific high-risk development site, such as those adjacent to roadways, the CCTS and shipping/cruise terminals.
- Assessing the cumulative impact will allow for a discrete assessment of the total risk for each development and how that will fit into the air shed of the peninsula and effect both existing and future receivers. The EPA recommends that DPE consider undertaking further assessment of cumulative air emission impacts as part of the strategic planning process.
- The EPA has previously received complaints from residents that are adjacent to the White Bay and Glebe Island port facilities regarding air quality and exhaust residue.
- The EPA recommends that the relevant sub-precinct plan is amended to ensure that any future sensitive land uses on the foreshore should consider both the current and future risks from vessel emissions at those locations.
- The control of odour, specifically from the Fish Market is also of concern. Best practice mitigation and management should be in place for the Fish Market and any other potentially odour emitting premises to ensure acceptable outcomes, especially for sensitive receivers such as dwellings and outdoor recreation spaces.

### Noise

The Noise Study adequately considers the risks and planning considerations of a vast majority of noise sources across the peninsula, including landside and vessel noise. However, there are some comments we wish to make regarding noise and vibration:

- There are noise and vibration considerations within the Rail Infrastructure Noise Guideline (RING) that apply to the new Metro Infrastructure. The EPA recommends that the Master Plan is amended to include these considerations and assessment requirements.
- Further, the Explanation of Intended Effects (EIE) Discussion Paper states “There are existing state and local regulatory measures in place to reduce and mitigate these identified sources of potential conflict, including the Infrastructure State Environment Planning Policy [ISEPP]. These policies will continue to apply to relevant developments in the Pyrmont Peninsula”.
- While this comment may be correct for development near busy roads and rail corridors, the ISEPP does not cover landside and vessel noise from ports. As such any new residential development should be assessed conservatively to ensure that any current and future uses of the nearby port facilities are taken into consideration. One option DPE could consider is to require any new development in the vicinity of port noise sources to take into account the ten-year predicted noise levels in the Glebe Island and White Bay Port Noise Policy (<https://www.portauthoritiesnsw.com.au/media/4763/port-noise-policy-final-december-2020.pdf>) during the design process.
- This conservative assessment should also take account of existing industrial and mechanical plant sources in the area, as they have the potential to cause significant disturbance. As correctly identified within the report however, these are generally covered by the City of Sydney planning documents.

### Contaminated land

As shown within the Contamination and Acid Sulfate Soil Study, the Pyrmont Peninsula has a substantial history with potentially contaminating land uses. Given the changing land use and redevelopment contemplated in the sub-precinct master plan, the EPA provides the following comments:

- The EIE states that it is likely that many sites will require further assessment and possible remediation work prior to development and that this work will be undertaken by the landowner or developer during the development application stage.
- Given the complex, intensive and extensive history of industrial activity across the Peninsula, and the possibility of common contaminants crossing land-ownership boundaries, a more detailed precinct-scale approach to investigating, managing and remediating contaminated land across the Peninsula could be considered.
- The sub-precinct master plans present an opportunity to consider contamination and remediation in a more strategic way, across multiple sites. The EPA notes that this process is currently underway for the Camellia-Rosehill Place Strategy. The Contamination and Acid Sulfate Soil Study also references the 'JBS&G, 2015, Site Wide Remedial Concept Plan, The Bays Precinct Urban Transformation Area,' which is an approach that could also be considered.
- Alternatively, a precinct-based approach to considering contamination could be undertaken across the entire Pyrmont Peninsula, rather than on a sub-precinct basis.
- On a separate issue, where rezoning is proposed and the Ministerial Direction regarding Remediation of Contaminated Land applies, the findings of the Contamination and Acid Sulfate Soil Study should be taken into consideration.

### **Water Quality**

The outcomes of the Master Plan would benefit from promoting and supporting the following key principles:

- Development that maintains or restores waterway health to support the community's values and uses of waterways such as aquatic health and recreation; and
- Encourages integrated water cycle management that includes sustainable water supply, wastewater and stormwater management and reuse and recycling initiatives where it is safe and practicable to do so and provides the best environmental outcome.