



21 April 2022

Environmental Protection Authority

Via email and online submission form:

permissioning.engagement@epa.vic.gov.au

To whom this may concern,

**City of Port Phillip Submission
EPA Development License Application APP007913
Ground Granulated Blast Furnace Slag Grinding Facility
353-467 Lorimer Street, Port Melbourne**

This letter outlines the City of Port Phillip's submission to the above Development Licence Application that is currently before the Environmental Protection Authority (EPA) Victoria for assessment.

Council understands that:

- Cement Australia Pty Ltd have applied to the EPA for a development licence to construct and operate a new Ground Granulated Blast Furnace Slag (GGBFS) grinding facility at 353-467 Lorimer Street, Port Melbourne.
- The facility is intended to receive, process and store the GGBFS in a warehouse and silo, ready to be dispatched for the domestic, commercial, and civil construction industries.

Interface with Fishermans Bend

The subject site is located along the Port of Melbourne's south wharf next to Fishermans Bend. The Fishermans Bend context and associated sensitive interfaces are illustrated in Attachment 1.

Fishermans Bend is Australia's largest urban renewal project covering approximately 480 hectares in the heart of Melbourne. The transformation of Fishermans Bend is guided by the Fishermans Bend Framework; a plan for parks, schools, roads, transport and community facilities and services to ensure livability as the precinct grows over the next 30 years. By 2050, the area will be home to approximately 80,000 residents and provide employment for up to 80,000 people. It will be Australia's largest Green Star – Community, striving for a 6 Star Green Star – Community rating.

Fishermans Bend consists of five precincts with the vision for each listed below:

- **Employment Precinct** - Australia's leading design, engineering and advanced manufacturing precinct.
- **Lorimer Precinct** - A vibrant, mixed-use precinct close to the Yarra River and connected to Melbourne's CBD, Docklands and emerging renewal areas.



- **Montague Precinct** - A diverse and well-connected mixed use precinct celebrating its significant cultural and built heritage, and network of gritty streets and laneways
- **Sandridge Precinct** - One of Melbourne's premium office and commercial centres, balanced with diverse housing and retail.
- **Wirraway Precinct** - A predominantly family-friendly inner city neighbourhood close to the bay and Westgate Park.

Council's submission is restricted to land located within the City of Port Phillip, being the precincts of Wirraway, Sandridge and Montague. The Environmental Protection Authority is encouraged to contact the City of Melbourne (for Lorimer and Employment Precincts), the Department of Environment, Land, Water and Planning, and the Department of Jobs, Precincts and Regions (Fishermans Bend Taskforce) to seek their views on strategic planning, land use and development transformation in Fishermans Bend.

Key Issues and Concerns

The application proposes a high intensity industrial use in proximity to existing and future sensitive interfaces in the Fishermans Bend Urban Renewal Area.

Concern is raised about managing potential amenity impacts including environmental, noise, vibration, air quality and traffic (particularly trucks/freight) through future mixed use areas that support residential intensification.

The EPA assessment and decision should take a precautionary approach that mitigates the following potential issues:

1. Proximity to Capital City Zoned Land in Fishermans Bend

The application is supported by reporting and evidence that considers its impact on the existing predominantly industrial and commercial context, alongside some (but not all) selected existing residential sites. The application does not acknowledge the site's location and context in proximity to existing and future sensitive interfaces in the Fishermans Bend Urban Renewal Area. This area is located in the Capital City Zone, which supports a range of existing and future sensitive receptors in mixed use areas including residential development, retail and offices, public parks and community infrastructure.

2. Noise, Vibration and Air Quality Mitigation

The assessment should consider the potential for noise, vibration and air quality impacts to existing and future sensitive uses in Fishermans Bend.

Noise is a particular concern given the sensitive nature of future surrounding land use and development. A preliminary acoustic report has been submitted with the application. The assessment is acknowledged to be preliminary and reliant on a more detailed assessment during detailed design phases of the application.

A comprehensive report should be provided by the applicant that addresses the relevant existing and future sensitive interfaces, particularly those nearest in the Fishermans Bend Wirraway Precinct as identified in Attachment 1, Figures 3 and 4 of this Council submission.

Should a permit be issued for the site, it should contain restrictions that ensure compliance with relevant sensitive interface requirements in context of residential intensification nearby. The following should be considered as a condition of the permit/licence requiring:



- a. A suitably qualified acoustic consultant must be engaged by the applicant during detailed design phases to:
 - i. Carry out a noise survey of the receptor areas in the absence of other existing commercial/industrial noise to confirm noise limits in accordance with the EPA Noise Protocol
 - ii. Model the noise emissions based on detailed plant schedules when available and determine if any additional mitigation is required
 - iii. Prepare a revised acoustic report
- b. Within 1-month of commencement of use, or another suitable time once the use is operating normally, carry out a noise survey at relevant sensitive receptor areas to confirm compliance with the EPA Noise Protocol

The modelling is not currently shown in the Acoustic Report. This should be provided in the revised report including graphical presentation of the noise emission contours.

3. **Managing the Impact of Freight / Truck Movements**

The application would result in increased heavy vehicle traffic movements, including articulated semi trailers (noted as single and b-double tankers in the applicant's reporting). Given their size, road geometry requirements and associated amenity impacts (noise/vibration), these vehicle movements are considered inappropriate for the road network within the City of Port Phillip, particularly the Fishermans Bend Capital City Zone areas that support increased residential and worker populations. Should a permit be issued for the site, restrictions would be warranted for road access and movement to and from the proposed use, avoiding Capital City Zoned areas as far as practical and focusing on direct access to and from the Westgate Freeway.

Thank you for the opportunity to provide this submission. If any further information is required, please do not hesitate to contact [REDACTED], *Senior Precinct Planner – Fishermans Bend* via email at [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]

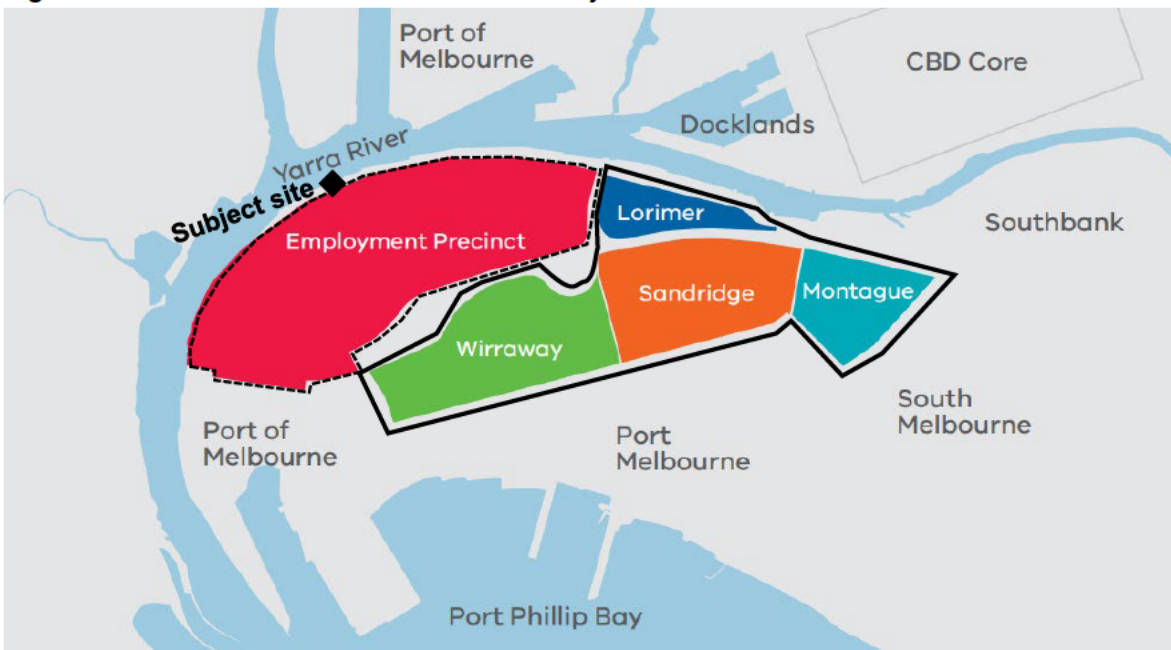
General Manager City Growth & Development (Acting)

ATTACHMENT 1

Figure 1: Subject Site Location



Figure 2 – Fishermans Bend Precincts & Subject Site Context



Fishermans Bend Precincts

- Montague Precinct
- Sandridge Precinct
- Wirraway Precinct
- Lorimer Precinct
- Employment Precinct

Strategic Direction

- National Employment and Innovation Cluster
- Fishermans Bend Urban Renewal Area (mixed use precincts in the Capital City Zone)

Context

- Subject Site

Figure 3 – Existing and Future Sensitive Interfaces in Fishermans Bend Capital City Zone

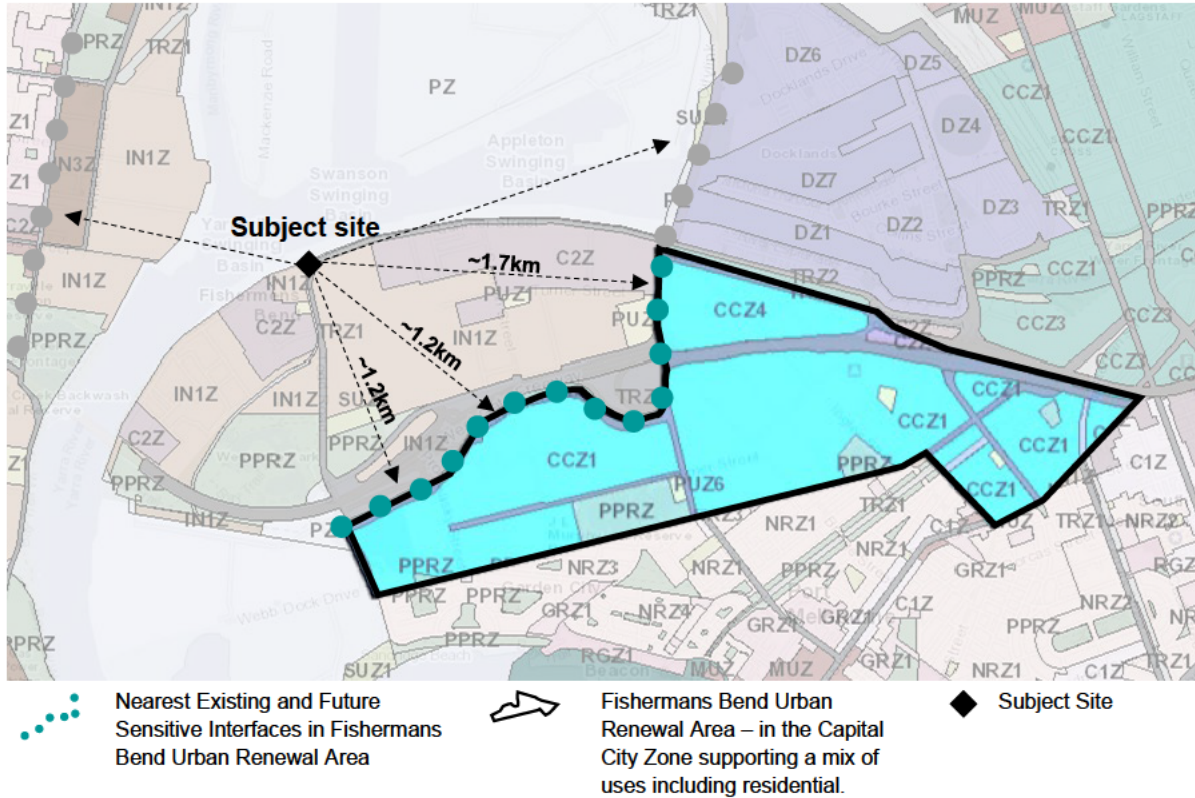


Figure 4 - Potential Locations for Noise/Sensitive Sensitive Receivers in City of Port Phillip

