

# **SSD 15\_7246, Foreshore and Public Domain Improvements Campbell's Cove.**

While I generally support the proposed Foreshore Improvements at Campbell's Cove, there are a number of areas in the application where information has not been supplied.

This information deals with details of the potential impact of the proposal on the amenity of my home at 8 Hickson Road and the potential negative impact on the quiet enjoyment of my residence.

The potential impact applies to both the construction phase of the project and the operational phase.

## **1. Construction Phase**

### **1. Construction Hours.**

I found no reference to the proposed hours that construction that will be undertaken on the site within the Environmental Impact Statement.

Appendix K contains a DRAFT Environmental & Construction Management Plan prepared by SJA Project Management. Page 8 of that report provides construction working hours of between 7.00am and 5.30pm Monday to Friday and between 7.00am and 5.00pm Saturday with no work on Sundays and public holidays.

The DRAFT report of 'Assessment of Traffic, Transport and Construction Implications'. The report gives a 34 week construction period and the same hours of construction activity as the DRAFT Construction Management Plan.

Our home is immediately opposite the site and will be affected by any noise coming from the site as a consequence of construction activities, material deliveries, waste material removal and truck and workers idling prior to the commencement of work.

Should the application be approved, a condition should be attached that restricts the hours of construction to between 7.00am and 5.30pm Monday to Friday and between 8.00am and 5.00pm Saturday. No work should be carried out on Sundays or public holidays. The prohibition of work outside these hours should include the prohibition of deliveries to the site, including the delivery of heavy machinery, collection of waste and materials from the site and the standing and waiting of workers and vehicles on Hickson Road.

### **2. Impact of Movement of Construction Vehicles.**

The impact of construction on my amenity and the amenity of other residents of The Rocks and Walsh Bay cannot be assessed as the report 'Assessment of Traffic,

Transport and Construction Implications' prepared by Transport Planning Associates is clearly only a draft report and is incomplete.

The last paragraph on page 14 of that report states:

"All existing pedestrian connections will be maintained except along the eastern footway of Circular Quay West. The envisaged movement of construction vehicles will be ? per day with more during any concrete pour and these vehicles will range between ? and ? with ? being used to remove excavated material."

Further page 15 of the same report states:

#### "TRUCK MOVEMENTS

The proposed truck routes are indicated on Figure 5 and the envisaged frequency is ?-? per day with more during concrete pours.

The largest truck to be utilised will be a ??

It is difficult to fully understand how the 'Assessment of Traffic, Transport and Construction Implications' can reach their stated conclusion on page 18 of the report that:

" \* The arrangements and process for construction activity will not have any adverse implications"

when clearly no assessment has been made of the number or size of vehicles associated with the construction.

The DRAFT Environmental and Construction Management Plan on page 10 under the heading 'Traffic Management Plan' states:

"The quantity of trucks entering and exiting the site is estimated at....."

Similarly, in discussing and assessing the "Construction Traffic Management" in Section 6.15. page 41 of "Environmental Impact Statement SSD 7246- Campbell's Cove, The Rocks" Urbis, consultant town planners, state:

" The envisaged movement of construction vehicles will be X per day with more during any concrete pour and these vehicles will range between X and X with X being used to remove excavated materials."

On the basis of this non-information, Urbis goes on to conclude on page 47 of the EIS that:

"It has been demonstrated that the proposed works will result in minimal environmental impacts, all of which can be managed or mitigated appropriately as outlined in this report."

Again, a conclusion is reached without any assessment of the number of vehicular movements or the size of vehicles likely to be generated during the construction phase.

## 2. Operational Phase

### 2.1 Truck Operations at the OPT

The operation of the Overseas Passenger Terminal currently results in noise impact on the residents of 8 Hickson Road and traffic impact on The Rocks, Walsh Bay and Millers Point. The road system through these high heritage value local areas was designed for the horse and cart not the massive trucks required to service the large cruise ships at the OPT. This servicing problem has become increasingly an issue since the expansion of the OPT and the increased frequency of large cruise ships using the facility - from approximately 22 in 2002 to several hundred in 2016.

It has been estimated that a single large cruise ship, such as the *Ovation*, loads more than 50 tonnes of fresh fruit and vegetables alone in Sydney each cruise season.

One aspect of the noise impact of the OPT is the 'beeping' noise of reversing trucks in the early hours of the morning.

Section 4.2, page 25, of the EIS states,

"It is PANSW's request that access be provided through the proposed new plaza area to the wharf apron extension. These operations typically occur early morning (5-9am) and are closely monitored and managed for safety."

The number of trucks servicing a ship are estimated to between 5 and 10 depending on the size of the ship.

The proposed relocation of the truck turn-around area to the proposed open plaza to the north of the OPT has the very real potential to increase the noise impact of these trucks on the residents of 8 Hickson Road particularly in the early hours of the morning.

It is considered that these impacts may be minimised by a high level of management relating to the minimisation of reversing and the strict adherence of all trucks accessing the OPT being totally compliant with RMA noise minimisation requirements and the adoption of a suitable code of practice that includes being neighbour friendly. The Ports Authority is supposedly preparing a Code of Practice for the OPT.

Should the management of truck movements fail to prevent noise impact, then the operations of vehicles should be restricted to between the hours of 7.00am and 6.00pm Monday to Saturday with no early morning operations.

### 2.2 Public Domain and Public Access

Section 6.2 of the EIS states:

“ The new waterfront promenade and public plaza will create the largest public gathering space in the Rocks Precinct with a unique cove setting for everyday leisure, performing arts, festival of Sydney, Vivid, Sydney Biennale, food festivals, music performances, open air cinema and theatre.”

While I am generally supportive of the use of these spaces for public leisure activities and festivals, such events have the very real potential to adversely affect the quiet enjoyment of my home particularly through the impact of amplified music, voices and general crowd noise.

The EIS and other reports submitted do not make any assessment of the impact of the use of this area for any form of public or private entertainment.

SSD15\_7246 should be considered for the works only. Further applications should be required for specific use of the spaces such applications containing complete details of the proposed use and appropriate objective reports from competent consultants.

## **2.3 Light Poles**

Section 3.9, Furniture & Fixtures, of the EIS states on page 23:

“Lighting, PA systems and speakers will be integrated into the light poles, which will be unique to the precinct.”

The PA systems of a number of cruise ships using the OPT, have noise impact on the residents of 8 Hickson Road. Any PA system installed within the subject area should only be used for emergency purposes and for crowd control during occasional major public events, such as New Year’s Eve and Vivid. They should not be used on a daily or even a weekly basis. Certainly, any such system should not be used to broadcast music or in conjunction with entertainment events so close to a residential building.

## **Conclusion**

1. I strongly object to the SSD15\_7246 as the application is based on incomplete and incorrect information and on a number of key reports that are only in draft form and not final documents. Further, conclusions in respect to the impact of the proposal have been reached without the collection or analysis of critical and appropriate facts.
2. The application should be refused or the applicant advised to withdraw the application and resubmit with correct and complete supporting documentation. The processing and consideration of such significant applications on the basis of incomplete and shoddy supporting documentation undermines public confidence in the planning approval process and does real damage to the fragile credibility of the planning profession and the development industry generally.

3. Should it be decided to approve the application, despite its inadequacies, the following conditions should be attached to any development consent:
- (i) Construction activities, including the delivery of plant, machinery and materials, the idling of trucks and other vehicles both on and off the site and the removal of waste and materials from the site is restricted to between the hours of 7.00am and 5.30pm Monday to Friday and between 8.00am and 5.00pm Saturday.
  - (ii) The approval is only in respect to the foreshore and public domain improvement works and must not be construed as approval of the use of these areas for any public or private entertainment purpose.
  - (iii) Any use of the foreshore or public domain areas for the purposes of any public or private entertainment must be the subject of further development applications. Such applications should include an assessment of the impact of such uses on the amenity of residents of 8 Hickson Road and guests of the adjacent Park Hyatt Hotel. Applications should include relevant objective reports prepared by appropriately qualified and credible consultants.
  - (iv) A plan of management must be prepared and approved to control and minimise noise from truck movements and other operations, as part of the OPT operations plan. Such plan must be approved prior to the use of the public plaza area for any purpose associated with the OPT.
  - (v) The OPT Operations Plan must be implemented with one clear outcome being the elimination of noise impacts of the operations of the OPT on the residents of 8 Hickson Road and guests of the Park Hyatt Hotel. If such noise impacts cannot be eliminated, then the hours of operation of the OPT must be restricted to between the hours of 7.00am and 6.00pm Monday to Saturday.
  - (vi) The PA system and speakers proposed to be installed within light poles throughout the area must only be used for emergency and crowd control purposes. The crowd control uses must be restricted to major public events such as New Year's Eve and Vivid. The system is not to be used for the broadcasting of amplified music or other entertainment purposes.