

Stephen Paul
PYRMONT NSW 2009

23 April 2018

Mr Ben Lusher
Director – Key Site Assessments
Planning Services,
Department of Planning and Environment,
GPO Box 39
SYDNEY 2001

Dear Mr Lusher

Re: **SSD 8544 - Glebe Island Aggregate Handling & Concrete Batching Facility**

I wish to lodge my strong objection to Hanson's proposed Concrete Plant on Glebe Island as this is not an appropriate site for this development.

Summary of Objections

This development should not be allowed to proceed for the following reasons:

1. The proposed facilities, with their 24/7 operation, would create significant noise, light, water and air pollution emitted from both Glebe Island and the ships berthed at GIB1.
2. The proposed development will impact the amenity of the precinct through severe traffic congestion, if not on a standalone basis, certainly on a cumulative basis when combined with other projects;
3. Based on documented evidence of ship operations, not predicted outcomes, the noise emissions from ships will be worse than predicted in the EIS;
4. The development significantly increases the risk to the health and wellbeing of residents in Pyrmont, Sydney's most densely populated suburb. Existing use rights for the port facility should not be an acceptable reason to disregard the health risk to nearby residents
5. The proposed location on the east side of Glebe Island and within the increasingly busy marine thoroughfare which links Rozelle Bay with Sydney Harbour will disrupt other marine traffic in/out of Rozelle Bay and create an unsafe waterway. It is clearly an inappropriate and unsuitable location for the proposed facilities;
6. The proposed structures are completely lacking in aesthetic value and will be an over-scaled eyesore on the landscape between Rozelle and Pyrmont, a throwback to an era of dirty, ugly industrial buildings and activities dumping high-level pollution of all types on existing and future residential areas; and
7. The development is not strategically compatible with the overall objectives and principles of the Bays Precinct and the 2000 Master Plan for White Bay and Glebe Island.

Detailed review of the Proposal

Strategically, the proposed Concrete Plant is extremely short sighted and conflicts with both the Glebe Island & White Bay Master Plan 2000 as well as Urban Growth NSW plans for The Bays Precinct that includes opportunities for cultural, maritime, recreational, tourism, retail, residential, research, education and commercial uses.

This proposal completely disregards the following principles in the White Bay and Glebe Island Master Plan 2000:

- enhanced environmental performance,
- improve the appearance of the port,
- maintain views of the Pyrmont Skyline & Anzac Bridge as seen from Balmain & White Bay Park,
- protect vistas for streets which terminate at the water,
- deliver a high standard of urban design,
- provide noise, light spill, water quality, air quality and hazard risk control measures (some proposed but not all will be mandated for all operations at the facility, e.g. truck driver behaviours, ship-to-shore power etc)

It is acknowledged that Glebe Island has historically been an industrial area and there are existing use rights as a maritime port, however, the precinct has evolved over the last 10 years and the surrounding areas include one of the most densely populated suburbs in Sydney, so it is a retrograde step to start to start ramping up industry, especially when there are so many other exciting uses for the site that offer much greater long term benefits to Sydney.

Operationally, there are a significant number of environmental concerns that have all been flagged in the Environmental Impact Statement. This document is extremely detailed and contains a lot of data, HOWEVER, it is an extremely misleading report. For example, it refers to ship berthing noise and the cumulative effects of other proposals for the area, then totally ignores them in the conclusions.

My specific concerns with this development are as follows:

1. The EIS justifying this project is very detailed but its independence, data validity and conclusions are questionable

The best way to justify such a conclusion is to give examples from the EIS, the document used to justify why the development should be allowed to proceed.

Disclaimer as to the independence of data used to arrive at conclusions

I refer you to a disclaimer by the company, Pacific Environment engaged to report on air quality (Appendix I, page 4). The Pacific Environment (PE) Disclaimer states amongst other things that the “report is based on the information made available by the client” and “does not attempt to verify the accuracy, validity or comprehensiveness of any information supplied”

I am not questioning the professionalism or integrity of the expert, however, the validity of the conclusions is open to question as they are potentially based on data accuracy, validity or comprehensiveness which may not have been verified.

Predicted outcomes that lead to desired conclusions

Most, if not all of the conclusions reached in this report, are based on “predicted outcomes” and there does not appear to be any evidence-based justification as to how these outcomes were arrived at in the report. Conveniently, nearly ALL predicted outcomes fall just below the nominated noise assessment criteria. For example, the Predicted Berth Activity Noise Level (Appendix D, Table 20, Page 28) that apparently excludes facility noise at night time is 51dBA (LAeq 15 min). This prediction is disingenuous given the numerous measured outcomes for other ships that have berthed at Glebe Island in the past. These ships include CSL Reliance had a measured noise level was 54dBA in June 2017 and ships for Knauf measured up to 57dBA.

Further, the predicted berth and amenity evening noise levels in the same table are predicted to be only 1dBA higher (52dBA) which conveniently happens to be the nominated Project Noise Trigger Levels (PTNL Table 8, Page 19) which under NPfI section 2.1 is the maximum noise level allowed so as not to contribute to an increase in noise in the area.

Data overlooked in the conclusions

I refer you to the Traffic Impact Assessment (Appendix H). This report appears to be comprehensive in its assessment in that it also raises the potential Cumulative Impacts of other projects and proposals in the area including Westconnex, Western Harbour Tunnel, Sydney Metro West, GI Multi-User Facility and the Hymix Concrete Plant.

However, in each case the report marginalises the potential traffic impacts of these projects and in the conclusion only considers the traffic impact of the Hanson proposal on its own. Specific examples of the reasons for disregarding significant data follows:

- Western Harbour Tunnel – “may lead to cumulative impacts for the subject proposal including increases in truck movement, activity and noise, which should be addressed as part of the environmental impact for the motorway project” . There is no doubt that will make the truck traffic far worse.
- Sydney Metro West – “due to the limited information available, the impact on the subject site is unknown”
- Glebe Island Multi-User Facility – “in terms of peak hour impacts, the REF explains that the majority of heavy vehicle traffic movements will likely occur at night or during the middle of the day due to efficiencies offered by scheduling truck runs outside peak hours. Therefore peak hour road network impacts are not expected to be significant”....yet during the public consultation meetings with the Port Authority, when concern was expressed about truck noise during the night, the Port Authority representatives stated that this is not necessarily the case as it will depend on demand and when the various facilities they are delivering to require the product.

It is non-strategic and disingenuous not to take into account the cumulative impact of all of these projects as the combined impact will have significant traffic implications.

2. The proposed location is unsafe and now unsuitable for the precinct

As identified in the media recently, most of the port functions have been moved to more strategically suitable locations such as Port Botany (it was also reported that this is at the expense of other viable ports such as Newcastle). Consequently, the port has become less financially viable and the Port Authority is struggling to justify its existence, which is why I believe it is actively encouraging this proposal as well as its own Multi-User Facility on the adjoining site.

The likes of Port Botany and Newcastle ports are more appropriate locations for the supply of construction materials to Sydney and should be developed accordingly to cope with future demand - not just for the next 10-15 years but far beyond. Glebe Island is ultimately inadequate and increasingly irrelevant, as its context and strategic advantage becomes more aligned with urban, tourism and leisure-related activities.

In terms of safety, cargo ships servicing both the Hanson and Multi-User Facilities would be manoeuvring and berthing in the narrow waterway which links Rozelle Bay to Sydney Harbour. Jones Bay is an increasingly busy marine thoroughfare which services a constantly-increasing and diverse range of craft which includes kayaks & dragon boats, the Sydney fishing fleet, yachts, pleasure boats and super-yachts of all shapes & sizes, Sydney Harbour cruise vessels, entertainment boats and ferries. If the proposals were to go ahead, the ships berthed (with no specified limit in numbers) will be within metres of the narrow entrance to Rozelle Bay via the old Glebe Island bridge, thereby encroaching on safe passage for other boats in/out of Rozelle Bay and endangering all marine traffic in the immediate area. The potential consequences of all of this for the safe manoeuvring and passage of other boats should be obvious - at best significant congestion and interference and at worst potential disaster and fatality.

3. The environmental consequences are unacceptable and a health risk

The proposed 24/7 facilities are located within 200-250 metres of residents and public park users.

Much of the EIS is dedicated to identifying and mitigating the risks of land-based operations, it does not address the risks of ship-based operations as this is claimed to be an existing use right. So, these facilities will be serviced by ships that will have to run engines/generators continuously whilst in port - **day and night** – creating both noise and air pollution and risking the health of all the nearby residents. There is substantial evidence that sleep disturbances lead to weight gain and mood changes in the medium term and to reduced glymphatics function – leading to degenerative brain disorders including dementia. Obesity, mental health disorders and dementia are costly for the population and NSW Health in the medium and longer term. Residents north and south of Glebe Island would be equally affected.....but that has been deemed acceptable in this report due existing use rights. So effectively, any health impacts to nearby residents are collateral damage.

The port's history has been acknowledged. However, the reality is that Glebe Island has not operated as a port on a 24/7 basis since they stopped offloading car-carriers in 2008, and since then residential towers for thousands of people have been constructed.

My objection is driven by a myriad of environmental concerns in relation to noise, air, light and water pollution. As far as the EIS that justifies this project is concerned, I again question the validity of the conclusions and raise the following specific examples:

A Maximum Noise Level Event Assessment (MNLEA) is required

Appendix D, section 4.2.2 (page 20) refers to sleep disturbance and refers to section 2.5 of the NPfI and states that where the development night noise exceeds 62dB (being the prevailing RBL of 47dBA plus 15db) then a Maximum Noise Level Event Assessment should be undertaken.

Per table 19 (page 28), the predicted Sleep Disturbance Noise Level (SDNL) is 64 dBA (at Evolve). However, this exceedance is deemed negligible at less than 2dBA. Further, it is claimed that the building façade external level has been built to a criterion of 63dBA, therefore there is only an excess of 1dBA.

I would argue that if the NPfI specifies a level of 62dBA, then there should be a MNLEA even for a 1dBA excess....you either exceed the maximum or you don't, and they definitely exceed.

Ship Noise and Health Implications

Whilst ship noise is recognised in the EIS, there are no serious measures taken to mitigate this issue as this “activity is recognised as a continued use of the existing port facility 24 hours per day, 7 days a week”. However, the last major port activity was in 2008 (car carriers) and since then numerous residential towers housing thousands of people have been constructed...so there are very real health implications for all the residents being exposed to this noise, as well as associated air pollution.

Ship berth noise levels are considered in this report (section 4.3, page 20). It states that while the NPfI enables the implementation of a noise management precinct for ports, it does not specifically address the transient nature of ship noise, which once berthed has limited opportunity to adjust noise emissions at any time. Further, the Impact Summary (page 32) states “due to the proximity between GIB1 and Pyrmont receivers, port facility noise levels may exceed noise planning goals”

NPfI section 3.1 requires Hanson to consider feasible and reasonable noise mitigation measures. In relation to ship noise, if I am reading this table correctly (Table 13, page 24), it concludes that having a vessel in “service operating condition” with the bow facing south will be mitigated by a sound power level of 106dBA (LAeq 15 mins). To put this reduction into perspective, the World Health Organisation (WHO) recommends that max recommended noise dose exposure levels for 106dbA is 3.7 minutes per 24 hours (see link <http://www.noisehelp.com/noise-dose.html>). So, this is a MASSIVE reduction for a noise where there is limited opportunity to adjust noise. If I have read the report incorrectly, and it's not actually a reduction, if this is what the noise is reduced to, then that level of noise is even more of a serious health risk based on WHO recommendations.

Finally, to add insult to injury, it states on page 29 that “Hanson advise they will co-ordinate with ship operators to ensure ship engines and ventilation systems are minimised where feasible and reasonable to do so”. In reality, as admitted by Port Authority representatives, they have little or no control over the ship operators, so this is merely a platitude.

Air Quality and Health Implications

Emissions from ship engines continuously burning crude diesel - together with fine dust particles from bulk materials on vessels coming from countries with low emission-reduction standards - will severely impact air quality.

Air Quality Assessments (Appendix I, page 18) specify AQ criteria relevant for assessing impacts from air pollution (NSW EPA 2016)...it states that these criteria are health-based and set at levels to protect against health effects. HOWEVER, because of this 24/7 activity it is re-introducing more ships running generators 24/7 YET this is not included in the assessment due to existing rights!! So, **a really important question that needs to be answered is this: do existing port facility rights preclude stopping something that has a health impact on residents?**

In one of the rare occasions where predicted outcomes actually exceeded the acceptable benchmarks, it was noted that on (page 43) Peak Operational Days there was a predicted excess of the maximum 1-hour NO2 at Evolve. Also, there were predicted excesses for 24 hour PM10 at Evolve. The report then concluded that these are conservative, and adopted more lenient criteria “contemporaneous assessment” to conclude that it is anticipated to meet assessment criteria. Therefore, arguably, rather than being conservative to ensure nearby residents health is not impacted, the report adopts criteria to suit the desired outcome.....which is objectionable.

4. The proposal understates significant road traffic consequences

This proposal combined with other proposals such as the Multi-User Facility and West Harbour Tunnel will require a large number of trucks to service these facilities....it is NOT appropriate to consider the traffic implications of each project on a standalone basis. As stated earlier, this report has done exactly that and consequently understates the potential traffic consequences for the precinct.

I was recently advised (9/4/18) by Mr Terry McSween, Principal Manager, Ministerial & Government Services, Transport for NSW that one of the benefits of the adjoining Multi-User Facility is that the “import of dry bulk materials by sea brings significant environmental and social benefits for Sydney by minimising road congestion, air pollution and road maintenance costs arising from truck movements on roads” by removing “approximately 140,000 long-haul movements p.a. from congested arterial roads”. However, by having trucks coming and going from the Glebe Island site, you are effectively centralising the 140,000 truck movements to the heart of Sydney where the roads are already clogged. Even if importing to Glebe Island reduces the number of truck movements, even a fraction of the 140,000 truck movements would have major traffic consequences for the precinct.

It is incredibly misleading to consider each project on a standalone basis. As stated earlier, we have been advised by Port Authority representatives that truck movements for the Multi-User Facility will be based on demand, so it is fallacious to assume (as your EIS does) that there won't be other trucks from the facility on the roads during AM and PM peaks. In your report Appendix H, Table 13, page 33) the Crescent/City West Link Road is currently assessed as having a service level of "D" in 2018 (with or without the Hanson project) and this is predicted to worsen to an "F" by 2029. Clearly, service levels for this intersection alone would worsen to an "F" way before 2029 if the cumulative impact was assessed.

Putting all statistics to one side.....it simply does not make sense to have truck movements concentrated in a single pivotal area where massive public funds are already committed to road system upgrades, close to the CBD and one of the most densely populated suburbs in Sydney, in an area where the State Government hopes to profit from further land sales and leaseholds with the re-development of the various Bays Precincts.

5. The development completely lacks aesthetic quality and is contrary to the strategic plans for the precinct

This development with its 34-metre-high silos would obstruct views of the highly-acclaimed Anzac Bridge from various vantage points which is in complete contrast to the vision for future developments in the Bays Precinct. The development is a low-quality industrial design at best and is a complete affront to the objective of developing a high-tech innovation hub on Glebe Island and the implications for high-quality and innovative buildings.

As stated earlier, this development totally disregards the following principles of the Glebe Island and White Bay Master Plan 2000:

- Enhanced environmental performance
- Improve the appearance of the port
- Maintain views of the Pyrmont skyline and Anzac Bridge as seen from Balmain and White Bay Park
- Protect vistas for streets which terminate at the water
- Deliver a high standard of urban design
- provide noise, light spill, water quality, air quality and hazard risk control measures (some proposed but not all will be mandated for all operations at the facility, e.g. truck driver behaviours, ship-to-shore power etc)

Conclusion

A large majority of Pyrmont residents is concerned with the various projects that are being proposed for Glebe Island and petitions have been lodged in the NSW Parliament in relation to concerns with the Multi-User Facility. The cumulative negative impact of this development when combined with the Multi-User Facility and Western Harbour Tunnel cannot be overstated and should not be allowed to proceed.

Please don't hesitate to contact me if you'd like to discuss or clarify my concerns in more detail.

Yours faithfully

Stephen Paull