

Jennifer Owen
PYRMONT NSW 2009

30 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 write to object to the construction and 24/7 operation of the Hanson's proposed Concrete Plant on Glebe Island. This is not an appropriate site for this development.

The project is not in keeping with the Glebe Island and White Bay Master Plan 2000, nor with Urban Growth NSW's Urban Transformation Program plan for the Bays Precinct for the coming 20 to 30 years. The 24/7 operation of the facility will significantly add to noise, light, water and air pollution emitted from Glebe Island and the ships berthed at the facility, and negatively impact on the health and wellbeing of residents in Pyrmont, located 250 metres across water and Sydney's most densely populated suburb, with over 15,000 residents, include 3,000 families, in one square kilometre.

I recently purchased in Pyrmont, encouraged by the significant urban renewal that has occurred under projects funded by both state and federal governments, and on the basis of Urban Growth NSW's Transformation Plan for the Bays Precinct, where 8 "stunning" waterfront precincts are to be constructed¹. Glebe Island is listed as one of these precincts. I understood the intention was to retain the working port status, but to do so in a way that reflected quality urban design and improved ecological and marine water quality improvements. The proposal to construct this large ugly shed & silos, with large ships discharging material and thousands of trucks shifting product on a 24/7 basis, is antithetical to the ambitions of the Transformation Plan. I also note that based on recent documented evidence of ship operations, the reality of noise emissions, particularly at Pyrmont, is likely to be worse than predicted.

The demand for construction materials in Sydney will continue to increase over time, given Sydney's status as an international city, and based on medium term population forecasts by Infrastructure NSW which see the city at 7.4 m residents by 2046². Thus, I further request that Hanson urgently be instructed by the NSW Government to find a permanent material handling solution in a more appropriate industrial port. NSW government funds should not be wasted on the construction of a facility that is only intended to be operated for 10-15 years, and whose presence and operations may impede the time frame for redevelopment under Urban Growth NSW plans for Glebe Island.

¹ Urban Growth NSW, The Bays Precinct: Urban Transformation Program, January 2017

² <http://www.smh.com.au/nsw/three-visions-for-sydney-s-density-as-2-4-million-more-people-call-it-home-20180222-p4z1c5.html>

My specific objections to this development are:

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 EIS justifying this proposal acknowledges the impact of ships creating noise and air pollution by running engines & generators on a 24/7 basis, however, it does nothing to mitigate them. These impacts have been ignored on the basis of existing continued use rights as a “working port”
3. The development significantly increases the risk to the health and wellbeing of residents in Pyrmont, Sydney’s most densely populated suburb. Existing continued use rights for the port facility should not be an acceptable reason to disregard the health risk to nearby residents
4. The proposed development will impact the amenity of the precinct through severe traffic congestion, both on a standalone basis, as well as contributing to an even bigger problem on a cumulative basis with other projects planned for the region;
5. The proposed structures are completely lacking in aesthetic value and not strategically compatible with the overall objectives and principles of the Bays Precinct and the 2000 Master Plan for White Bay and Glebe Island.

Rationale behind my Objection

I have read Hanson’s EIS and the Appendices. I find most of it too technical for me to sensibly comment upon. However, common logic leads to the inability to understand how the construction and 24-hour per day, 7 days per week operation of such a large and ugly facility, with ships unloading thousands of tonnes of product and thousands of trucks being used to shift product, not to mention the light and vibration of large ships berthed at the facility, can possibly lead to such minimal additional noise, light, air and water pollution impacts as indicated in the Hanson report.

Further, the modelling undertaken by the consultants engaged by Hanson appears to be incomplete, as whilst it may have raised most of the issues that have an environmental impact, many critical factors were not taken into account in arriving at conclusions that were based on “predicted” outcomes only, and optimistically outlines a range of measures that “should” be undertaken to mitigate impacts, some of which are clearly in breach of current guidelines.

Whether these measures will be mandated is yet to be seen, however some of the factors identified in this EIS, such as ship berthing noise will be reliant on ship operators to voluntarily take steps to minimise ship noise whilst in port. It is stated 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. In my experience, relying on the goodwill of private enterprises to undertake mitigating impacts which will be at their costs is naïve and misguided. These operators will simply refuse to comply, and it will be the residents of the precinct who will suffer.

There is evidence that breaches of recommended thresholds and above those predicted can occur. I refer you to noise monitoring report for CSL Reliance at Glebe Island Berth 1.³ This report demonstrated that the CSL Reliance exceeded night time noise levels at Pyrmont by up to 8dB during the period measured. We have concerns that the current predictions will be similarly regularly breached.

³ CSL Reliance Glebe Island Berth 1: Compliance Noise Monitoring Report, SLS, 6 June 2017.

I take umbrage to the underlying premise of the EIS that *“Port facilities have existed since at least 1968, and the berth (GIB1) activity is recognised as a continued use of the existing port facility 24 hours per day, 7 days per week”*

That Sydney Harbour has been a working port for over 100 years is acknowledged, however Sydney has changed dramatically over that period, and a significant amount of the Sydney harbour port activity has been relocated to other ports. New, leisure-based, activities have replaced industrial uses, and these are increasingly important in driving the tourism economy of NSW. In addition, the resident population of the area has grown dramatically, creating a conflict between the proposed increase in heavy industry and the health and wellbeing of increasing numbers of people who live in this area.

The project is inconsistent with the established principles and provisions for development in the area.

The Glebe Island and White Bay Master Plan 2000 outlines the goals for redevelopment of the port to improve the environmental and aesthetic impact of the port over time, while retaining its working port status. The Port Authority, in its own report, (pages 19-22) dismisses most of the objectives of the Master Plan as not relevant, and states that it is nearing the end of its relevant timeframe. There is no “end date” in the Master Plan, however, it does outline that it is intended to guide planning for the next 20 years⁴. Thus, it is still applicable. The principles and provisions are EXACTLY relevant to the proposed facility as they were specifically intended for any such development in this precinct.

The particular principles that the Hanson proposal has disregarded are:

- 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)

Reflecting the design principles is the fact that the Port of Sydney has dramatically shifted its focus away from maritime supply to Leisure Industries over recent years. The Port Authority’s own website notes that:

“The 2016/17 cruise season saw a record 344 ships visit Sydney, including 10 maiden voyages. This growing trend of cruise has cemented Sydney’s place as the premier and unrivalled cruise destination in Australia and the South Pacific”.

Further, the Port Authority’s website also states:

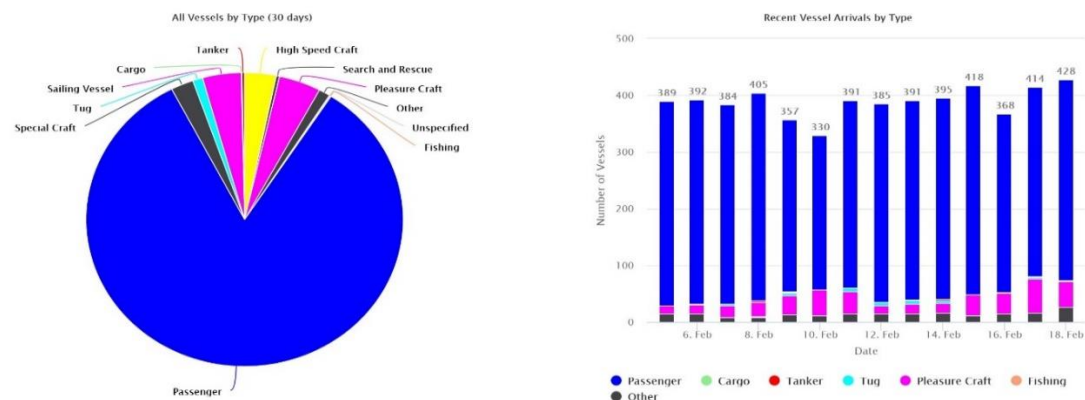
“Cruise is the fastest growing tourism sector in Australia. It is also a growing trend for Australians, with 1.3 million people, or 5.3 per cent of the population cruising in 2016. (Source: Cruise Lines International Association. Cruise Industry Source Market Report - Ocean Cruise Passengers Australia 2016). Latest statistics from the 2016/17 economic impact study released by the Cruise Lines Industry

⁴ Glebe Island and White Bay Master Plan 2000 Part A, page 14.

Association shows that the cruise industry is worth \$5.28 billion nationally, with 58 per cent attributed to NSW.”⁵

Most vessels now entering and leaving Sydney harbour are passenger ships, with maritime supply operations now representing a small proportion of overall traffic. I refer you to the website http://www.marinetraffic.com/en/ais/details/ports/109/Australia_port:SYDNEY, which shows marine traffic for the past 30 days. 83.21% of all traffic was passenger vessels. Cargo vessels accounted for 0.05% of all traffic. Around 400 vessels per day arrive into Sydney harbour.

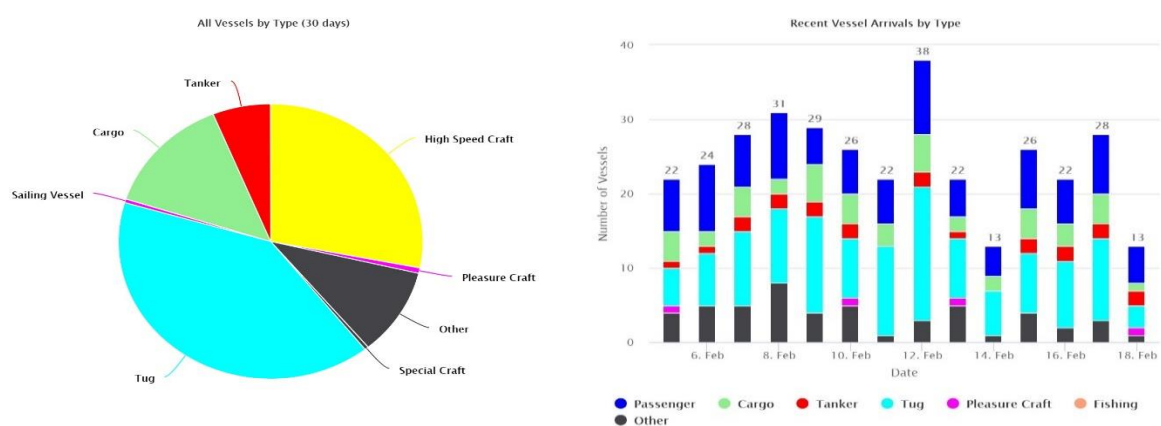
Figure 1: Recent Ship Arrivals and Departures by Type and Number in Sydney Harbour



Source: www.marinetraffic.com website, Sydney (AU), arrivals and departures

Port Botany now fulfils the major function of import and export of materials in the Sydney region. Consideration should be given to expand the operations of this port for the purposes of supply of construction materials to Sydney.

Figure 2: Recent Ship Arrivals and Departures by Type and Number at Port Botany



Source: www.marinetraffic.com website, Botany (AU), arrivals and departures

Additional heavy industry uses in the Sydney harbour region threaten to jeopardise the ports attractiveness for cruise ships, and thus the value of this growing element of the global tourism industry.

This development completely lacks aesthetic quality and the development with its 34-metre-high silos would obstruct views of the highly-acclaimed Anzac Bridge from various vantage points and is a complete affront to the objective of developing tourism.

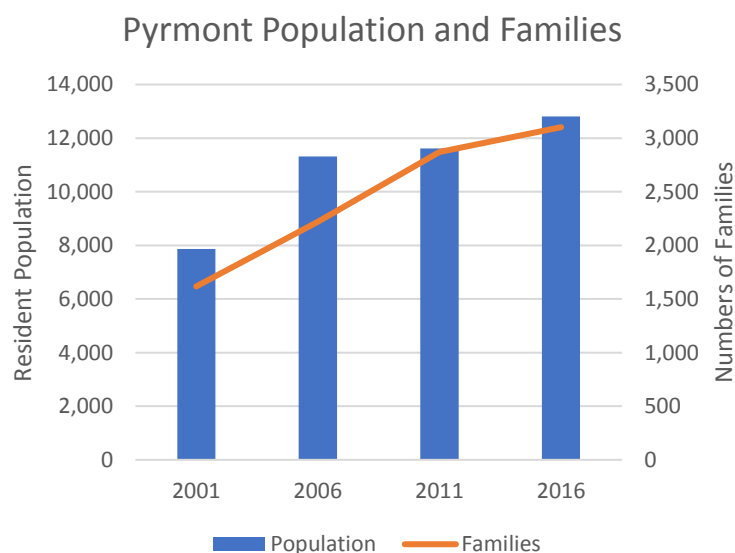
⁵ <https://www.portauthoritynsw.com.au/cruise/cruise-industry/>

As well as the working nature of the port transforming to a tourism hub, the state and federal government have invested significant funds over the past 2 decades in driving the urban renewal of the Pyrmont area, particularly under the Federal Government's Building Better Cities program in the early 1990's.

The state established the City West Development Corporation in 1992 to further the development of the Pyrmont and Ultimo area. This aim is jeopardised by allowing activities which are inconsistent with the quality of life, health and wellbeing of the residents who have been encouraged (or duped?) into moving into the area. Many, myself included, decided to move into Pyrmont as a result of this recent investment made by governments, and by assertions for the future made by the state government, through Urban Growth NSW. I was impressed by the vision for eight "stunning" waterfront precincts, including Glebe Island, which are targeted for development. This current proposal sits contrary to the goals outlined for the area over the term of the Bays Precinct development, and I am cynical about the "temporary" nature of the proposed facility.

The area of Pyrmont is now the most densely populated in Sydney and increased heavy industry will impact the health and wellbeing of residents. What were once derelict and industrial zones have been redeveloped for multi-density housing, and the population of the surrounding area has increased in density.

In 1978, there were only 1800 residents remaining in Pyrmont ⁶. However, by the 2016 Census, resident numbers were 12,813, a 62% increase from the 2001 census. The number of families in Pyrmont has almost doubled over the same period, rising to 3,102 by 2016.

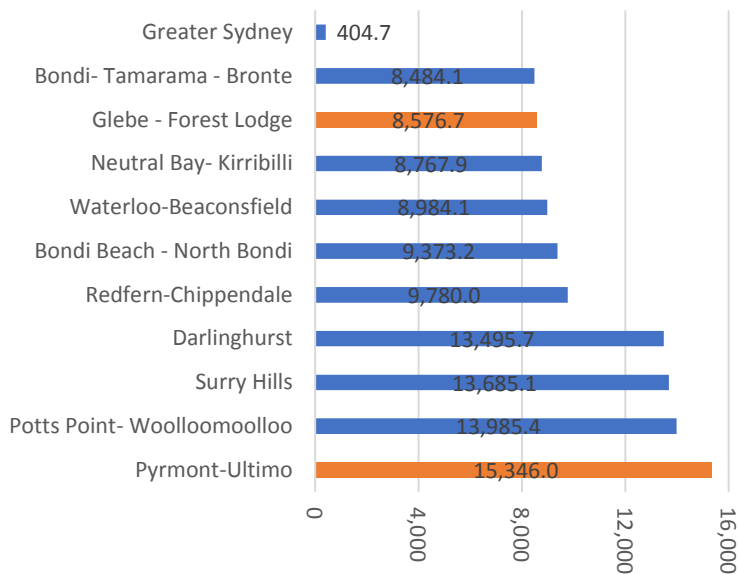


Source: ABS: Census, 2016, 2011, 2006, 2001

According to the ABS, Pyrmont-Ultimo is the most densely populated area of Sydney, with 15,346 residents per square kilometre. Glebe -Forest Lodge, which will also be affected by traffic, noise, and air and light pollution, ranks ninth, with 8,576 people per square kilometre.

⁶ Mathews, M. *Pyrmont and Ultimo, A History*. Sydney: Pyrmont Ultimo History Project, p 26

Figure 3: Most Densely Populated Neighbourhoods in Sydney



Source: Sydney Morning Herald, <http://www.smh.com.au/nsw/how-crowded-is-your-suburb-how-australian-neighbourhoods-compare-to-the-world-20170331-gvaw5g.html>

So, even if you accept that there are continued, existing use rights.....there are 2 questions that still need to be answered:

- 1. how should the port facility be utilized – as it was in 1968, as it has been over the last decade, or in a way that is aligned with the strategic direction and vision for the future?; and**
- 2. do existing use rights of the port facility on a 24/7 basis preclude the NSW Government from stopping something that has a health and well-being of residents?**

Quite simply, this development does not align with the future vision for the precinct and it is a risk to the health and well-being of residents.....so it is not the answer!!!

Much of the EIS is dedicated to identifying and mitigating the risks of land-based operations. The EIS does not address the risks of ship-based operations. Consequently, 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.

Specific concerns are as follows:

1. Sleep Disturbance

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 2dB exceedance is deemed negligible. 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.

Sleep deprivation can have serious health and well-being consequences and should not be dismissed lightly. Even the smallest breach of any sleep disturbance benchmarks should be closely assessed.

Further, whilst the exceedances are claimed to be negligible, the SDNL is a “predicted outcome” and the exceedance is more than likely to be a lot higher than has been predicted.

2. Ship Noise

Whilst ship noise is acknowledged, 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”.

The EIS (section 4.3, page 20) states that “while the NPfl 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”

Hiding behind the curtain of “continued use of the existing port facility” at the risk of the health and well-being of residents is objectionable.

Perhaps the EIS should be more focused on what the continued use could be so as to not risk the health and well-being of residents through sleep deprivation.

On page 29, “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.

3. Air Quality

Emissions from ship engines and generators continuously burning crude diesel and oil will severely impact air quality.

Air Quality Assessments (Appendix I, page 4 hardcopy or page 18 on softcopy) specify criteria relevant for assessing impacts from air pollution (NSW EPA 2016) and 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.

In one of the rare occasions where predicted outcomes actually exceeded the acceptable benchmarks, it was noted that on (page 29 hardcopy or page 43 softcopy) 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.

Perhaps the EIS should be more focused on what the continued use could be so as to not risk the health and well-being of residents through increased air pollution from ships and trucks.

4. Road Traffic

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, day and night, during peak and non-peak times....it is NOT appropriate to consider the traffic implications of each project on a standalone basis. This report has done exactly that and clearly the potential traffic consequences for the precinct are understated.

Many Pyrmont residents were recently advised 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.

So, it is incredibly misleading to ignore the other projects and consider each project on a standalone basis. Yet this is exactly what the EIS has done, as 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”
- 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”. However, during the public consultation meetings with the Port Authority, 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.

There will be a significant loss of amenity.....

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.

Conclusion

“Continued use of the existing port facility 24 hours per day, 7 days per week” should not be at the expense of the health and well-being of the communities surrounding Glebe Island.

“Continued use of the existing port facility 24 hours per day, 7 days per week” would be at the expense of the strategic direction and vision for the future.

This site is not appropriate for this development as it does not align with the vision for the future, it is an environmental risk and it will impact on the health and well-being of the surrounding communities.

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

Yours faithfully

Jennifer Owen