

1 May 2018

Department of Planning and Environment  
320 Pitt Street  
SYDNEY  
NSW 2000

Attention: Ben Lusher

By online portal

Dear Sir

**Re: Glebe Island Aggregate Handling and Concrete Batching Facility**

1. I am a resident/owner of an apartment in Sugar Dock at 4 Distillery Drive opposite Glebe Island. My apartment has north-west facing direct views of the proposed concrete batching plant and the proposed Multi-User Facility (MUF) and is directly affected by the potential acoustic and visual impacts from the proposal.
2. I make the following objections to the proposal.

*Lack of Strategic Planning*

3. The proposal by Hanson and the MUF proposal being considered by the Ports Authority ought to be subject to a single assessment process. The fact that the Hanson proposal is subject to Part 4 of the *Environmental Planning and Assessment Act* (EPA Act) and that the MUF proposal is to be assessed under Part 5, when both projects are thoroughly intertwined, demonstrates a lack of co-ordinated planning. Further, the whole of Glebe Island should be subject of a proper co-ordinated strategic planning process rather than the piecemeal, needs-based approach that is currently underway.
4. One solution to the lack of co-ordinated strategic planning would be for the Minister to direct a public hearing in relation to both developments or at the very least, both developments should be assessed together by the Independent Planning Commission (IPC).

*Use of Glebe Island for concrete batching and the MUF*

5. I acknowledge that the port is an existing operation and that the NSW Government has long desired to continue port operations in Sydney Harbour to maintain a working harbour. Glebe Island has always been an integral part of the working harbour.



6. I also acknowledge the opportunities to utilise Glebe Island for enhanced bulk loading operations in order to reduce consequential road transport of raw materials.
7. Despite this, it must also be acknowledged that as a result of extensive strategic planning over the last 25 years, the neighbourhood surrounding the port has changed substantially. The removal of industrial activity from the Pyrmont Peninsula and the development of a significant residential community has taken place resulting in Pyrmont now becoming the most densely populated residential neighbourhood in Australia.
8. It is for this reason that the port at Glebe Island is no longer surrounded by industrial activity, but a residential interface has been created. The effect of this is that the assessment of noise impacts can no longer be undertaken as if Glebe Island has been operating as a working port with 24/7 loading and unloading operations.
9. With this in mind, the visual impacts and the noise impacts warrant more careful investigation of a location for the concrete batching plant behind the MUF or in a more shielded location on Glebe Island, such as immediately to the east of the existing silos, with an orientation parallel to the road east of the existing silos. Alternatively, more consideration should be given to re-purposing the existing silos for the purpose of concrete batching. Both of these options would place the concrete batching plant more central to Glebe Island and further from residences in Pyrmont without placing it too close to Balmain as well as away from the approaches to the ANZAC Bridge.

*24/7 operations are unreasonable and unrealistic*

10. I object to the proposed 24/7 operations in so far as they anticipate 24/7 berthing operations. The assumption underpinning the Acoustic Report is that the port has been operating as a 24/7 operation from GIB1 and 2. In the seven years that I have lived at Sugar Dock, this has never been the case.
11. The Acoustic Report places considerable reliance on an earlier assessments and subsequent approval in 2013 for the use of GIB1 and 2 for bulk unloading. While ships have unloaded bulk materials at GIB1 and 2, this has not been on a 24-hour basis since the residential community developed at Jackson's Landing.
12. In fact, far from it. When Knauf operated gypsum unloading at Glebe Island in 2013 and 2014, the EPA licence imposed noise limits of 49 dBA (LAeq 15min) for Pyrmont. The noise limits did not apply if the unloading ceased at night (10 pm to 6 am). This was because it was recognised that the noise criteria could not be achieved with operations beyond 10 pm. Consequently, Knauf always ceased operations at 10 pm which meant that they could make as much noise as they wished during day time and evening hours, but they ceased at night.
13. The report prepared by AECOM for the MUF acknowledges (Part 4.2), it is the ship operations in port which exceed the relevant noise criteria (Part 7.4.2 Table 23). The MUF and the Glebe Island





Concrete Batching Plant will facilitate far greater use of the port for bulk handling than is currently the case. This means that the number of ships in port is likely to increase dramatically and the likelihood of significant noise criteria exceedances from ships will increase.

14. Accordingly, the fundamental assumptions underpinning the SLR Acoustic Report, that ships can be expected to load and unload 24 hours per day, is not a reasonable assumption given that such operations from ships will far exceed the relevant Rating Background Level (RBL) criteria for night time operations.
15. Even without the assumptions about "existing port operations", the acoustic assessment by SLR discloses exceedance of sleep disturbance criteria at Bowman Street Pyrmont. My apartment and at least 50 others in Sugar Dock alone are orientated towards Bowman Street. The 2 dBA exceedance of the sleep disturbance criterion is an unacceptable imposition on a dense residential community that has been encouraged to move into this location by planning policies of three NSW Governments since the 1990's.
16. To say that such noise levels are consistent with "existing uses" ignores the fact that GIB1 and 2 have had limited use for the last 10 years and certainly none after 10 or 11 pm.
17. It follows that 24/7 operations are not a reasonable outcome given that ship operations alone will exceed the relevant noise criteria if ships are unloading. If the proposal and the MUF are contemplating ship unloading at night, this will condemn thousands of residents of Pyrmont to intolerable night time noise. While it may be accepted that noise from ships will occur during day and evening hours, the idea that night time ship operations and the concrete batching and MUF activities could continue 24/7 is entirely unacceptable.

#### *Visual impact*

18. The visual impact of the proposal is unacceptable in respect of views from the public domain and private apartments as well as its impact on obscuring views of the iconic ANZAC Bridge from both the public domain and private property.
19. While I accept that concrete silos per se may fit within the existing industrial character of Glebe Island, care is required in their location. The Visual Impact Assessment is correct to conclude (at p viii) that the positioning of the proposal parallel to the Glebe Island Bridge and the ANZAC Bridge results in the greatest impact on landscape character. I surmise from this statement that the proposal has not been located so as to *minimise* the impact on the surrounding area, but rather located simply for ease of loading and unloading. This is a reason for refusal of the proposal in itself.
20. The obscuring of views of the ANZAC Bridge from OL 31 (Fig 31), OL 4 (Fig 50) and OL 6 (Fig 58) demonstrate the proposal will have a significant adverse impact on views to the ANZAC Bridge from the public domain. Far from being a moderate impact at OL6 as described at p 65, I consider the impact to be high to severe.





21. While at OL7 the structure will largely be seen within the frame of the existing silos, the height and the eastern extent of the silos will still have an adverse impact on the public domain in that location. Further, I do not consider that the proposals for a "green wall" or "solar panels" achieve any amelioration of the impact. These measures are tokenistic "sops" at best.
22. Figure 63 of the Visual Impact Assessment gives a fairly good representation of the views from my apartment, though I suspect it has been taken from Silk at 2 Distillery Drive from an apartment that does not also have views of the ANZAC Bridge. Thus the views of the western approach, cable ties and western pylon of the ANZAC Bridge which can also be seen from different vantage points in my living/dining room and my balcony are not shown in Fig 63. Even if the structure is painted or "beautified" as foreshadowed, the eastern protrusion of the silo structure will have an adverse impact on views from my apartment to the ANZAC Bridge.

### *Light Spill*

23. The EIS and the Lighting Impact Assessment identifies a high impact from lighting from OL7. Without detailed lighting plans it is difficult to make any meaningful comment. However, I am concerned about adverse impacts of night lighting. Currently when the lights are used at Glebe Island they do cause significant light spill into apartments in Jackson's Landing. This is not unacceptable for the short periods of time they are used. However, if they are to be used more often, because of the Concrete Batching Plant and the MUF, the impacts will be potentially significant.

### *Other Options*

24. The EIS faintly canvases other options for the proposal, but does not identify what other locations were considered. I disagree with the conclusion that *"The design of the proposed development sympathetically integrates with its surroundings to reduce bulk, scale and view impacts"*. It does nothing of the sort, at both public and private viewing points. That conclusion is hardly supportable in the light of the Visual Impact Assessment.
25. The use of the existing silos at Glebe Is. has not been considered. Similarly, a location pushed back further into the island parallel to the road rather than parallel to the Glebe Island Bridge would result in far less visual impact from Balmain and Pyrmont because the shorter face of the silos would be more prominent rather than the longer face.

### *Conclusion*

26. While I support ongoing port uses at Glebe Island, 24-hour operations from GIB 1 and 2 are unreasonable based on noise and light spill impacts. The significant potential for conflict between port uses and the extensive residential development that has occurred at Pyrmont means that any new development of Glebe Island is likely to have a significant impact on the residential interface.



27. The visual impacts on the public domain and private apartments are unacceptable, particularly on iconic views of the ANZAC Bridge.
28. A fully co-ordinated planning approach for Glebe Island is required before approving this significant development along with the MUF, or at the very least, both applications should be referred to the IPC.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Andrew Pickles', with a long horizontal flourish extending to the right.

**Andrew Pickles**