

2 May 2018

The Hon. Anthony Roberts MP  
Minister for Planning  
GPO Box 5341  
Sydney NSW 2001

Dear Minister

### Concrete Batching Plant, Glebe Island

I write to object to the proposed aggregate handling and concrete facility with shipping terminal at Glebe Island. In its current form, the proposal represents a significant intensification of industrial activities within a precinct that has become largely residential. If unchanged, together with the multi-user facility proposed adjacent to the site, the facility would have significant impacts on adjacent communities.

There is general support for Glebe Island to retain some level of working harbour and recognition among surrounding communities that the region will always have a working harbour presence. However, this part of the harbour has changed significantly over the last two decades under successive state and local government urban renewal policies. The industrial purposes of Pyrmont have been replaced with residential communities and further development has been earmarked including on the current Sydney Fish Market site, which is to be moved to the existing Hanson concrete handling site. The working harbour at Glebe Island has been significantly scaled back over the last decade allowing extensive residential development along the Pyrmont peninsula. Pyrmont has become Australia's most densely populated neighbourhood.

Glebe Island is now located within an environmentally sensitive area, with large numbers of people potentially affected by activities on the site. It is only 200 to 250 metres away from the high rise apartment buildings along Jacksons Landing and Bowman Street. The proposed port must respond to this current setting.

***I am concerned that the current proposal fails to address this context and would result in serious impacts on existing and future Pyrmont residents.***

### Planning Process

Glebe Island sits within the Bays Precinct, which has been the subject of extensive work with stakeholders and residents for over a decade. The community has repeatedly been promised a holistic vision for the precinct that sets the future direction of development and land use, while protecting existing residential amenity. A strategic vision has not been finalised, yet new developments continue to be proposed in an ad hoc nature. This piecemeal approach will not result in the best public outcome for the region. ***A master plan for the precinct should be completed before any proposed development is approved.***



Reports in the development application include complex technical figures, predictions and claims on dust, pollution, noise and lighting. Most people in the community do not have the expertise to understand how figures were derived or interpret what they mean in terms of impacts. It is difficult to know if the appropriate modelling has been used, with little information provided on how figures were determined.

***The Department of Planning must critically assess and verify all figures, claims and predictions on impacts to ensure that they are correct and that the final determination protects local residents, with appropriate conditions of consent imposed if the project is approved.***

### **24-Hour Operations**

I strongly oppose the plan to allow ships to berth at the port 24 hours a day, seven days a week. This will result in significant sleep disturbance for a large number of people and is the issue of greatest concern within the adjacent Pyrmont community.

People in the inner city accept that they live with some noise including at night, but this should not give proponents of adjacent sites free rein to run loud and disturbing operations. The government should recognise the right of inner city people to the peaceful enjoyment of their homes and access to respite from constant noise.

Berthed ships produce high levels of noise, air and light emissions and it is of great concern that ships are also proposed to be berthed at night at the adjacent multi-user facility resulting in significant cumulative impacts in Pyrmont. Residents already report impacts from ships and cruises in the precinct including the constant hum from generators which they find particularly disturbing. Ship to shore power could reduce these impacts but it is not proposed.

Sydney Airport has a curfew to protect amenity at night for residents living under flight paths; the same protection should be awarded to residents adjacent to the working harbour.

The environmental impact statement states that ships would be berthed two to three times a week for 12 hours at a time. This provides opportunities to restrict ship deliveries to daytime and weekdays and to prevent a ship from being berthed at the facility while another is berthed at the multi-user facility. If the proposal is to be approved, ship hours and coordination with the multi-user facility must be part of the conditions of consent to provide residents with respite, especially at night.

Lights from vessels can also be intrusive with residents reporting impacts from current operations at Glebe Island yet the lighting impact assessment only assesses impacts from Pirrama Park and Waterfront Park, without identifying how residents in adjacent apartments will be affected. Impacts in the parks range from moderate to high and similar impacts are likely in adjacent buildings. It is unacceptable that the proponent has ignored lighting impacts in people's homes at night when they need to sleep.

The environmental impact statement identifies a number of measures that could be adopted to reduce lighting impacts from vessels including dimmable open deck lighting and multi-zone lighting controls to allow work within different areas of the ship. If the department does not impose conditions to restrict night time berthing, these measures must be made mandatory conditions of consent.

While most land based activities will occur within an enclosure that will contain noise and dust and may therefore not require curfews, clear restrictions are required at night on activities that are not within the enclosure. Impacts like reverse beeping and compression brakes from entering and exiting the site can result in significant disturbance and are not appropriate at night given the residential impacts.

## Noise

The intensification of industrial activities at Glebe Island will increase noise pollution for people living at Jackson's Landing and Bowman Street. Noise travels across water and sounds bouncing off apartment buildings will increase volumes.

Noise levels have been assessed as only passing environmental standards when Pymont residents keep windows and doors closed. Many buildings at Jackson's Landing are designed to have windows and doors open for ventilation and this is vital to ensuring there is fresh, healthy air indoors. It is unacceptable to expect Pymont residents to keep windows and doors closed when this will reduce ventilation in their homes to be able to sleep.

The noise mitigation measures are unclear and the environmental impact statement proposes consultation with the NSW Ports Authority on measures to reduce noise from berthed ships due to unloading raw material, ventilation systems and ship engines. This will be ineffective because the NSW Ports Authority does not have solutions – indeed its Review of Environmental Factors for the adjacent multi-user facility excludes real mitigation measures and discusses the need for further work. NSW Ports Authority officers have told me that ship to shore power is not widely used in shipping and is currently not feasible.

The environmental impact statement refers to a management plan that the NSW Ports Authority has for managing ship deliveries as a way to reduce noise, however it is not clear what this will involve and to what extent it will protect residents from unacceptable impacts. There is a proposal to establish Precinct Management Noise Levels and while I support managing noise across the precinct rather than site-by-site, there is flexibility in how levels would be developed, providing no guarantees for affected neighbours.

***Strong noise mitigation measures must be established and imposed as conditions of consent if the project is approved to protect residents from noise, particularly when ships are berthed.***

## Air Quality

The impact of the proposal on air quality is a strong concern for residents of Jackson's Landing and Bowman Street particularly from ship fuel emissions, dry concrete and aggregate dust, and truck exhaust.

The environmental impact statement states that concrete batching will occur indoors and that truck loads will be covered to prevent airborne dust; these measures must be made mandatory conditions of consent. Ships delivering concrete and aggregate must also be required to cover their product so that particles do not become airborne at sea or in the bay.

The primary air emissions have been identified as particulates, nitrogen dioxide and sulphur dioxide, which are known hazards. There must be live monitoring of these pollutants, with results regularly published online. Monitoring sites must include residential receivers along the harbour in Pymont. Where air quality breaches occur, activities should be stopped until there is a solution.

Figures reported for expected air pollution levels are confusing and difficult to understand in terms of impact on health, particularly from ship activities and cumulative impacts with the proposed multi-user facility. It appears that assessments rely on Pymont homes along the harbour keeping their windows and doors closed, but residents must be able to ventilate their homes with fresh air from outside or they will suffer from reduced air quality regardless.

There are currently no standards for ship emissions and little regulation to protect air quality from ships. The federal government has recognised potential health impacts and introduced regulations to protect residents from cruise ships, which must now use low sulphur fuel when berthed. This

does not apply to ships berthed at ports and without shore to ship power there is no way to guarantee any level of emissions from berthed vessels, especially while generators are running.

The department must conduct a detailed analysis of reported air quality impacts and ensure its final determination does not result in increased pollution for residents. Shore to ship power should be mandatory, and if it is not currently feasible, port activities should not be expanded in residential areas until work has been done to provide energy for ships.

There must be mandatory regular independent assessments of dust and pollution to ensure levels remain safe, regardless of whether residents raise concerns or how many residents lodge complaints.

### **Traffic**

While the proposal aims to take truck movements off the Sydney metropolitan road network, it will substantially increase truck movements between the site and the CBD, where there are already high levels of congestion, particularly in Pyrmont and the ANZAC Bridge.

The application would add a significant number of trucks onto the local road network including 189 vehicles in the AM peak hour and 98 in the PM peak hour. These will largely be heavy vehicles including 14-metre articulated semitrailers and 19-metre aggregate trucks. The claim that this would not add to noise, pollution and congestion is dubious.

Of great concern is that there is no assessment of the cumulative impacts on traffic with other adjacent projects. The proposed adjacent multi-user facility is expected to add 1,200 two-way truck movements per day although more is possible if demand grows. The local traffic and transport network will become choked and there is no information on how bus services, which are already unreliable because of congestion, will be affected.

***There must be an appropriate cap on the number of truck deliveries to and from the site to protect residential amenity and the local transport network, particularly during peak travel times.***

The provision of seven bicycle parking spaces for staff is inadequate and fails to recognise that the site's location provides good opportunities to cycle to and from work, from train stations in the CBD or from adjacent densely populated neighbourhoods. A transport plan must be developed for staff to encourage them to use active transport options other than private vehicles to get to work.

### **Views**

Photomontages are inadequate for determining impacts on views. They show built structures but exclude berthed ships or parked cars and trucks on the foreshore, or the adjacent multi user facility. This does not enable affected communities to determine impacts or provide suggestions that would result in improved foreshore amenity. ***Additional photomontages need to be presented to the community prior to any determination.***

I share community concern that the large silos would block views of Anzac Bridge from certain vantage points including foreshore public space and their size should be scaled back to protect views.

### **Public Waterway**

The project site is adjacent to harbour bays that are heavily used for passive boating, especially along Bank Street in Pyrmont. There is no evidence that the proponent has consulted with passive boating organisations to ensure that the additional number and large size of ships accessing Glebe Island will not impact on passive boating safety or access to the harbour.

Passive boating activities have launched from this part of the harbour for over a century and new developments must not interfere with this important recreational activity.

**Construction**

I support limits that restrict construction activities to standard construction hours to ensure residents can get respite in the evening and on Sundays and public holidays, and this must include the arrival and departure of trucks.

Where concurrent construction of the multi-user facility is expected to result in cumulative noise that exceeds permissible levels at Refinery Drive – as identified in the environmental impact statement – the proponent must be required to notify affected residents in advance so that they can prepare for the disturbance.

There are large numbers of residents in this region and it is the government's responsibility to ensure development at Glebe Island does not impact on residents' health, wellbeing and amenity.

***Given these serious impacts, I ask that you refuse the application or introduce strong controls to protect local residential amenity.***

Yours sincerely

A handwritten signature in dark ink, appearing to be 'AG', with a long horizontal stroke extending to the right.

Alex Greenwich

**Member for Sydney**

Copy to Department of Planning and Environment