

The Director
Key Sites Assessments
NSW Department of Planning & Environment
GPO Box 39
SYDNEY 2001

Attention: Mr Karl Fetterplace

Re: Hanson Concrete Plant Application # SSD 8544
OBJECTION

Dear Sir

As residents and joint owners of the above apartment at Jacksons Landing, we write to object to the Hanson proposal and to call for refusal of the application.

The Hanson proposal is for a very large concrete-production and aggregate distribution facility at the southern end of GI wharves 1 & 2 adjacent to the Glebe Island Bridge. If approved, it would have very significant adverse environmental effects on our quality of life and would also adversely affect local businesses and the wider residential community;

This project involves 24/7 operation with high night-time usage levels and the prospect of large cargo vessels being continuously at berth within a short distance of a large residential community. This is an outrageous proposition, which would create unacceptable levels of pollution and would be detrimental to many residents of Jacksons Landing, many of whom are over 60 and therefore more susceptible to such pollution than a younger community would be.

Please refer to our detailed list of issues below, which form the basis for our objection.

Locational Issues

1. the proposal appears to be part of an attempt to recreate a significant industrialized port in an area whose urban landscape is undergoing change to other, more appropriate, uses;
2. the proposed location ignores the rights of residents to the peaceful enjoyment of their indoor and outdoor spaces;
3. the proposal is open-ended in terms of potential future expansion - without limits on usage - which is apparently not subject to any overriding planning controls. This is an issue for both the wider community and the transformation objectives for Glebe Island;
4. Port Botany is the appropriate port for the supply of construction materials to Sydney and should be developed accordingly to cope with future demand - not just for the short term but far beyond;
5. Glebe Island is ultimately inadequate and increasingly irrelevant, as its context and usage shifts to more residential-, urban-, tourism-, and leisure-related functions and will involve increasing traffic congestion on land and on water. Its future is in commerce, technology, tourism and maritime services, as outlined in the Bays Transformation Plan 2015;
6. cargo ships servicing this facility (and the adjacent proposed MUF) would be maneuvering and berthing in the narrow waterway which links Rozelle Bay and Blackwattle Bay to Sydney Harbour. The Port Authority describes Johnstons Bay as a port, which is a throw-back to times gone by, when cars were unloaded at Glebe Island and CSR occupied the opposite shore. It has clearly evolved from a port to a marine thoroughfare over the 10 years since cars were regularly unloaded at this location;
7. Johnstons Bay is an increasingly busy marine thoroughfare which services an ever-increasing and diverse range of craft which include 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) would be within metres of the very narrow entrance to Rozelle Bay via the old Glebe Island bridge, thereby encroaching on safe passage for other boats in/out of Rozelle & Blackwattle Bays and endangering all marine traffic in the immediate area. The potential consequences of all of this for the safe maneuvering and passage of other boats should be obvious - at best significant congestion and interference and at worst potential disaster and fatality;
8. the proposed location at GI 1 is completely incompatible with the residential and recreational needs and rights of surrounding residents and the general public in Pyrmont, particularly in the context of the adjacent MUF;

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9. the proposed location is also incompatible with existing and proposed public foreshore and open space development including existing promenades around Pyrmont point, Pirrama park and Jones Bay wharf. Public enjoyment of these areas is a key plank of existing urban renewal as well as the visions for linking the various destinations of the Bays Precinct. Fumes, dust, noise and water pollution from an industrialized Glebe Island would destroy the benefits of this public open space development.

Environmental Issues

1. the proposed 24/7 facilities are located within 200-250 metres of residents and public park users. Without shore-to-ship power, ships berthed would run engines continuously - **day and night** - resulting in **night-time noise levels in excess of EPA limits**;
2. significant **breaches of EPA noise limits have already occurred without any mitigation** (ref. SLR Consulting noise monitoring report for CSL Reliance at Glebe Island Berth 1, which demonstrated that the CSL Reliance exceeded night-time noise levels at Pyrmont by **up to 8dB**). A response to this breach, which reflects future outcomes, is conveniently omitted from EIS, which chooses to deal only with predicted noise at lower levels.
3. statements in the EIS suggesting that Jacksons Landing apartments have been designed to cope with noise are both disingenuous & misleading - apartments have in fact been designed with generous opening windows & balconies to aid natural ventilation and reduce reliance on air-conditioning. Many of these facades are primarily glazed, with little ability to attenuate noise;
4. the entire wharf is likely to be artificially lit at night with significant negative impacts on quality of sleep for nearby residents;
5. 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 and toxic outputs - will severely impact air quality. Yet there do not appear to have been any quantitative or qualitative estimates of the full range of likely air pollutants under the proposed 24/7 operations nor any specific plans to mitigate them;
6. water pollution impacts, which do not even appear to be addressed in the EIS, are likely to be significant given the level of human activity around this part of the harbour, the new fish markets, harbour cruises, dragon boat racing and other water-based sporting activities in Rozelle and Blackwattle Bays;
7. there appear to be no proposed mitigation measures for any adverse environmental effects in the EIS. Instead, an apparent attempt to convince the reader that there aren't any!

Proposed 24/7 operation is inappropriate and unacceptable

1. 24/7 operations are contrary to the current usage of Sydney harbour, where very limited ship activity occurs before 8am or after 8pm. This will impact on the entire harbour, not just Johnstons Bay;
2. ship berthing, materials loading and unloading, concrete production and other industrial facilities constitute heavy industrial use and 24/7 operation will cause major additional night-time disturbance to all residents in Pyrmont and surrounding areas. Artificial lighting at night, in association with on-board ship lighting is totally unacceptable at times when residents should be able to enjoy peace and quiet at home;
3. the EIS has set no restrictions on vessel or truck numbers and movements at night or on weekends or within any particular period. This is a totally inappropriate situation in such a densely populated area;
4. the absence of any limits in the Hanson (and PA) proposal would allow operators to continually expand facilities in response to commercial demands. The cumulative effects of the 2 facilities would amplify the burden on residents.

Proposal is unsustainable

1. the proposed facilities will clearly increase noise, light, air, and water pollution in the harbour, as well as marine and road traffic congestion in Jones, Johnstons, & Rozelle Bays and the surrounding already congested road network;
2. the proponent goes to some lengths to make assessment and predictions about some, but not all, of these impacts, and (conveniently) assess them all to be minor. Cumulative impacts of each new development have not been considered;
3. the project is described as a "low-cost" solution, meaning low cost to shipping operators, transport companies and property developers who collect, transport and use the materials. The proposed facility has significant night-time operating potential, to reduce transport and fuel costs of trucking companies. Residents are expected to subsidise these outcomes by increased exposure to pollutants, reductions in property values and quality of health; operations would impose significant human costs on the surrounding residents, in terms of increased pollution, sleep disturbance, and traffic congestion (road & marine).
4. excess noise issues would lead to higher power costs because air-conditioning will be required more often, with doors & windows kept shut;

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5. resulting increases in air and water pollution in such a busy area of human activity, and one increasingly visited by international tourists, flies in the face of sustainability and common sense.

Proposal conflicts with BAYS PRECINCT TRANSFORMATION PLAN 2015 as well as the GLEBE ISLAND & WHITE BAY MASTER PLAN 2000

1. proposal 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. In that plan Glebe Island is described as the "Glebe Island Innovation District";
2. the Transformation Plan objectives are to support economic activities of maritime industries, combined with a high-tech "economic hub that will promote Sydney's global economic competitiveness"; in a way that reflects high quality urban design and improved ecological and marine water quality improvements; to create a mixed-use innovation district;
3. current proposal to construct a gigantic and unsightly concrete plant, with ships carrying thousands of tonnes of loose material and trucks exporting over 1,000,000 tonnes of wet concrete and similar amounts of bulk aggregate per annum at the rate of several hundred trucks per hour, to be operated 24/7, but likely mostly at night, is completely incompatible with the ambitions of the Transformation Program;
4. the proposed facility does not comply with the principles in the Glebe Island & White Bay Master Plan 2000 in relation to noise levels in bedrooms, which suggest a Leq of 40dBA to be used as **an upper limit for assessment of sleep arousal** inside bedrooms. The measured noise levels from existing ships (ref CSL Reliance report of June 2017) show that both facilities are likely to result in bedroom noise levels far above that limit;
5. the proposals dismiss or disregard the following principles in the White Bay and Glebe Island Master Plan 2000:
 - enhanced environmental performance,
 - improve the appearance of the port,
 - deliver a high standard of urban design,
 - provide noise, light spill, water quality, air quality and hazard risk control measures (some are proposed but not all will be mandated for all operations at the facility, e.g. truck driver behaviours, ship-to-shore power etc)

Conclusions

The proposed facility - with its 24/7 operation - would create significant noise, light, water and air pollution from operations on Glebe Island as well as ships berthed at Glebe Island. This would result in a severely negative impact on the health and wellbeing of residents in Pyrmont, located as close as 200-250 metres away in Sydney's most densely populated suburb. Residents in surrounding areas, as well as existing businesses located on Glebe Island, would also be affected. Based on documented evidence of ship operations, the reality of noise emissions, particularly at Pyrmont, is likely to be much worse than those predicted in the EIS supporting the application. This will result in both substantial sleep disturbance and adverse health and safety outcomes.

The proposed location on the east side of Glebe Island and within the increasingly busy marine thoroughfare which links Rozelle & Blackwattle Bays with Sydney Harbour will disrupt other marine traffic in/out of Rozelle Bay and create an unsafe waterway. This is clearly an unacceptable outcome and reinforces the argument that the proposed location for these facilities is both inappropriate and unsuitable.

In our view, the proposed Hanson Concrete Batching Plant and Aggregate Handling Facility has absolutely no merit in terms of the public interest and should be refused. The continued use of existing and expanded port facilities 24 hours per day, 7 days per week should not be at the expense of the health and well-being of local businesses and residential communities surrounding Glebe Island. Nor should it be at the expense of the strategic direction and vision for the future.

Yours Faithfully

Mr G and Mrs A Zuzza