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Mr Karl Fetterplace,  
Department of Planning and Environment,  
320 Pitt Street,  
SYDNEY. NSW 2009



Dear Mr Fetterplace,

## Glebe Island Aggregate Handling and Concrete Batching Facility

We have consulted widely with our members and members of the Pyrmont community and have listened to a range of views – from strong support of the Working Harbour to total opposition to both the proposed Ports facility, and the Hansons Concrete Batching Plant relocation to Glebe Island. However, there appears to be general acceptance that the site for the plant has been dedicated to Port activity since 1901, continues to so operate, albeit currently on an occasional basis, and is foreshadowed to “support blue economic activities of port and maritime industries, potentially combined with a technological and innovation campus” (p42, *Bays Precinct Transformation Plan*, October 2015.)

We acknowledge that the industrial nature of the plant is compatible with the activities to the west of the site, but also point out that many community members are of the view that it is incompatible with the relatively recent, large scale residential development to the east of the site. However, we understand that locating the plant within the port zone will enable the delivery of raw materials by ship, rather than by trucks using the already congested roads in the Inner Western suburbs, and the busy Princes Highway.

Whilst Glebe Island's use as a Port is accepted (in some cases reluctantly), we would wish to work with the Hansons and the Ports Authority to ensure that environmental impacts on nearby residents, visitors to local parks, and workers are minimized by adoption of world's best practices in both the construction and operating phases of the batching plant project, particularly with regard to the operations of the ships, when in port. It is noted that up to 3 ships per week (156/yr) will deliver aggregate to the plant, in addition to the up to 80 ships per year expected at the adjoining Multi-User Facility (MUF), with the potential of high noise and air quality impacts on nearby residents most likely from the ships' need to keep their engines running throughout the unloading operations.

Of great concern to Pyrmont residents is the prospect of delivery of raw materials occurring 24/7 although it is recognized that concrete agitator trucks will generally not require loading late at night. It is understood that all ports around



the harbour operate up to 24/7 however, in the case of the plant, it is recognized that, in reality, each delivery of aggregate will last approximately 12 hours and will take place largely within enclosed spaces. It is vital that the conveyor system from ship to the silos be lined with appropriate material to muffle noise.

We also note that cement will be delivered by tankers, yet there “may be an opportunity for cement to be delivered to the site directly via a pipeline from the Cement Australia silos” (EIS p31), located on another part of Glebe Island. We urge Hansons to bring forward its investigation of this option in order to keep 45 tankers off the nearby road system.

*Recommendation 1: Hansons to be required to restrict its operations (both in receiving raw materials and loading concrete tankers) to 12 hours/day, avoiding night time operations; require Hansons to line the conveyor to the silos with noise insulation; Hansons to investigate early installation of a pipeline to Cement Australia silos to avoid road delivery by tankers.*

We comment on the impacts of concern to members of the community:

- 1.0 Noise Impacts – Of greatest concern to members of the community is the possibility of adverse noise impacts from the operations of both the Hansons plant and the MUF. From experience, we have observed that some ships delivering raw materials to Glebe Island are very noisy as they have to run their engines throughout the delivery operations. We note that Ports Authority has considered, and rejected, the possibility of supplying shore to ship electricity which would mitigate such noise impacts, but we also note that this methodology has now been adopted at Garden Island, resulting in substantial noise reduction.

To mitigate ship noise levels, we strongly support the installation of a solar power generation and battery storage facility, in partnership with the Ports Authority, to generate sufficient power to enable shore to ship energy supply at both facilities, and, possibly at other facilities on Glebe Island. This would represent an environmental offset, substantially reduce both facilities’ carbon footprint, and help ameliorate some of the community angst about living close to a major industrial/port enterprise. It is also consistent with the objectives of the Bays Precinct Transformation Plan for Glebe Island and any future “technological and innovation campus”.

*Recommendation 2: Hansons to liaise with Ports Authority and other relevant Government agencies to install a solar power generation and storage facility at Glebe Island and require delivery ships to adapt their systems to enable shore to ship power supply.*





Many tables in the EIS show impacts as measured from Refinery Drive, Pyrmont, which is further away from the facility/ies than the residential apartment buildings in the vicinity of Bowman Street. They have been identified as the “worst affected residential receivers within the noise catchment area” (p51 REF for the MUF).

*Recommendation 3: Noise impacts at the residential building/s in Pyrmont closest to the facilities should be monitored and evaluated, and any increases above those listed in the EIS addressed and advised to those affected.*

It is difficult to understand the cumulative impact of noise from the multi-user facility and the proposed Hanson's concrete batch plant (REF p42) and Tables 9, 10 and 11 (EIS pp 54-55). It is stated in the Ports REF that “the proposed night-time amenity contribution noise level for the Project is 47 dB(A) which has been selected on the basis of it being achievable for the operations using feasible and reasonable noise mitigation while also providing an equitable noise mitigation burden for Hanson's concrete batching plant.” The intrusive noise levels for the batching plant are estimated to be up to 55; amenity levels up to 62; and sleep disturbance levels up to 64 dB(A) measured from Refinery Drive, Pyrmont, the latter levels representing “an exceedance of 2-7 dBA” (EIS p78). It is unclear to the layperson what these figures mean. It is also claimed (EIS p78) that “cumulative construction noise impacts associated with WestConnex will be minimal” and no mention is made of possible noise impact from work on the Metro project. What are the cumulative noise levels if all facilities and projects are operating at the same time, and, in particular, at night?

*Recommendation 4 – Both Hansons and the Ports Authority to clarify in layperson's terms the maximum cumulative noise levels expected at each NCA, if both facilities, WestConnex and the Metro projects are operating simultaneously and what measures will be taken to address impacts which exceed the EPA's Noise Policy for Industry requirements.*

In discussing traffic noise, the EIS notes that existing traffic noise levels exceed the established noise criteria (75 dBA) and states that “where the nominated criteria are already exceeded traffic associated with a development is not permitted to increase the existing noise traffic levels of more than 2 dBA (p55 EIS). However, on p 56, it appears to state that the predicted Glebe Island activity would result in cumulative noise levels increasing by 1 dBA – 4 dBA which appears to exceed the limit set.



*Recommendation 5 – Hansons and the Ports Authority to ensure that cumulative traffic noise levels do not exceed 2dBA over the existing noise exceedance from traffic.*

Reference is made to the provision of additional acoustic treatments in residential buildings close to Glebe Island (EIS p25). We point out that with the doors and windows closed, noise impact is reduced, but balconies are not so enclosed resulting in loss of amenity, especially during the warm summer months, and when doors are closed use of air-conditioners is required. This results in higher energy consumption, and costs.

- 2.0 Air Quality – Of almost equal concern is the emission of dust and particulates from both the batching plant and the MUF. We note that AQ data has been measured during 2015 and 2016 from the EPA's Rozelle monitoring station and advise that these measurements are likely to be unreliable due to the proximity of vegetation. Given that Pyrmont residences are closest to the site, and that wind conditions, often extreme due to funneling between high-rise towers and cliffs, differ from those at Rozelle, we urge the immediate installation of a new monitoring station in the vicinity of the corner of Bowman and Bank Streets, Pyrmont in order to collect new and more relevant baseline data against which to assess the likely AQ impact on those who live close to Glebe Island.

*Recommendation 6 – Hansons/Ports to install a monitoring station in Pyrmont close to Glebe Island and collect more relevant baseline AQ data than that available from Rozelle.*

Of particular concern is the possible adverse amenity impact from the emission of Sulphur dioxide from ships moored at Glebe Island during delivery of raw materials. It is noted that Federal government standards already require ships to use 0.1% Sulphur fuel while they are docked but allow 3% fuel while ships are in transit. However, standards foreshadowed by the Australian Maritime Standards regulatory body stipulates that from 2020 the maximum allowable Sulphur content in fuel will be reduced from 3% to 0.5% across Australia, in line with a global regulation set by the International Maritime Organisation (Mick Kinley AMSA CEO Feb 2018 to Senate Estimates hearing). It makes sense to apply these new standards to ships delivering raw materials to Glebe Island from the commencement of operations at both the concrete batching plant and the MUF.

*Recommendation 7 – Ensure that Sulphur emissions comply with the foreshadowed 2020 national regulations from the commencement of operations at Glebe Island.*





We note, and commend, the mitigation measures proposed to ameliorate dust and particulate emissions, in which virtually all movement of materials will be within enclosed areas, including the conveyor belts. As proposed above, we urge the early installation of a pipeline from the Cement Australia silos to avoid any escape of dust in the delivery of cement. We have ongoing concerns about the emission of particulates from ships moored at Glebe Island, but were unable to find any mention of this in the EIS.

*Recommendation 8 – Hansons to clarify the level of emissions from aggregate delivery ships, and take steps to mitigate adverse impacts.*

- 3.0 Traffic and Transport – We note (EIS p 60) that traffic volumes were measured at only 3 intersections. We point out that whilst aggregate delivery truck movements and movements of concrete agitator trucks would generally use the City West Link (including the oddly-named short section of this road as the Crescent, running from the W end of the Anzac Bridge to the intersection of what we know as the Crescent and the City West Link), the M2 and the Anzac Bridge, when any of these intersections become congested, there are flow-on effects on intersections as far away as Harris St/Pyrmont Bridge Road, Bank Street/Pyrmont Bridge Road, and Victoria Road/Roberts Street.

In the event that no changes are made to the infamous interchange adjacent to the current site of the Sydney Fish Markets (destined to become a high-rise residential and commercial precinct), and the proposed trebling of visitors to the proposed new Fish Markets at Blackwattle Bay eventuates, it is inevitable that the addition of 189 (am peak) and 98 (evening peak) movements will increase the Level of Service (LOS) beyond the very limited catchment cited in the EIS (pp60 – 62), noting that the LOS “will already be operating beyond its current capacity by 2029”. Contrary to the operation of the WestConnex once operational alleviating traffic on surrounding roads (EIS p62) it is our view that the discharge of traffic from the proposed Rozelle interchange will substantially increase LOS (noting that WestConnex has been unable or unwilling to provide traffic projections to Pyrmont and to the Crescent in Annandale).

*Recommendation 9 – Additional traffic studies to be undertaken at the intersection of Victoria Road/Roberts Sts, Harris Street/Pyrmont Bridge Road, and Pyrmont Bridge Road/Bank Street intersections, taking into account the foreshadowed large increase in traffic associated with the*



*new Sydney Fish Market and redevelopment of current Sydney Fish Market site.*

We have observed the occasional use of barges to transport batches of concrete to other parts of the city, and, noting that water transport is the most environmentally efficient form of transport, we ask that consideration be given to establishing ramps at Glebe Island/White Bay and at suitable sites around Sydney waterways, to enable laden concrete agitator trucks to be transported by water rather than via congested roads.

*Recommendation 10 – Hansons to investigate use of barges to transport concrete from Glebe Island to construction sites within the delivery catchment of the plant.*

Contrary to the claims that the Glebe Island site is “well serviced” by public transport, the EIS (p24) then notes that the bus stop nearest to the Glebe Island site is 1km by foot and the nearest light rail stop is approx. 1.3kms by foot. Lack of access was cited as the reason for Google to withdraw from the purchase of the White Bay Power Station site and we are unaware of any plans to improve public transport in the foreseeable future (apart from a possible Metro station in the late 2020s). The EIS makes reference to various Government transport plans, but omits reference to Sydney’s *Ferries Future* which foreshadows a ferry service to Glebe Point, again at some time in the distant future. Such a service could include a ferry stop at White Bay/Glebe Island and Pyrmont to serve residents, visitors and workers in the Bays Precinct.

*Recommendation 11 – Hansons to work with community representatives to make representations to Transport NSW to bring forward plans to improve public transport to the Bays Precinct, including Pyrmont.*

We note that a Parking Management Guide (PMG) will be prepared for the site. Such plan should contain a prohibition on trucks reversing, and on the use of loud “beepers” on the site. The PMG should be required to be developed in partnership with community representatives.

*Recommendation 12 – Parking Management plan to be developed in close consultation with community representatives; the plan to prohibit large vehicles from reversing and using beepers on the site.*

- 4.0 Visual Amenity – Much of the community concern relates to the perceived loss of visual amenity from both homes and local parks. This has been evaluated as “high” from Waterfront Park; and “high to





moderate" from Pirrama Park, in Pyrmont (Appendix E p ix). Again, there are polarized community reactions to the visual impact of the proposed plant and adjacent MUF, with some "receivers" welcoming the renewal of the Working Harbour, and others decrying the imposition of industrial activity perceived as ugly, so close to their homes. No amount of mitigation can compensate them for their perceived loss of amenity.

The proposed mitigation measures include a suggestion that the core structure of the silos be left open as the currently proposed roof will adversely affect those using the Anzac Bridge. We oppose this suggestion as it could lead to a decrease in air quality for those living and recreating close to the plant.

***Recommendation 13** – The silos should be fully enclosed, including with a roof structure to reduce possible air quality impacts on nearby residents and park users.*

We note the proposal to install a wall of shipping containers, to the height of 3 containers, in front of the plant to minimize noise impacts. Whilst this may be effective for receivers in apartments at the lower levels, and those using public parks nearby, it is likely not to mitigate noise impacts for residents at higher levels in multi-storey apartments. It is also possible that noise will ricochet off the metal cladding of the containers amplifying the impact. It will also be important to involve community representatives in discussions about the visual treatment of the container wall as it presents to residents and the general public. Options may include the use of bright colours, or colours which blend into the background.

***Recommendation 14** – Further investigate the noise impact of operations on nearby residents and park users located at heights above the height of the container wall. Ensure community consultation on the visual treatment of the container wall.*

There are also opposing community reactions to the idea of providing artwork on the plant structures. Some would prefer the structures to blend into their surroundings unobtrusively; and others who welcome such decorative features as are applied to the heritage silos nearby. There is strong support for trees and shrubs to be planted to shield and soften the visual impact of the structures. We welcome the proposal to involve the community in the development of the Public Art Strategy and the urban and landscape Masterplan for the site.



*Recommendation 15 – Hansons to undertake extensive consultation with affected communities when developing the Public Art Strategy and the urban and landscape Masterplan for the site.*

- 4.0 Lighting – The ambient night lighting at Glebe Island is already substantial, and it is noted (EIS p75) that the potential lighting impacts in Pyrmont will add to this form of pollution. At Waterfront Park the impact will be high; and will be moderate at Pirrama Park. However, no detailed lighting plan has yet been prepared. Whilst recommendations for impact mitigation are listed (EIS p74), it is noted that these can be overridden by main lighting control “in the event of an incident, or compliant with class requirements”. Every effort should be made to avoid light spill outside the Hanson lease boundary.

*Recommendation 16 – Hansons to work with both the Ports Authority and community representatives when developing the detailed lighting plan, to ensure that light spill makes minimal impact on affected residential areas, including from both on-shore and on-ship sources.*

- 5.0 Socio-Economic Impact – Looked at from a broad perspective, the relocation of Hansons' concrete batching plant to Glebe Island will bring some benefits, including reduction in road transport of raw materials to the site; and possible additional employment opportunities. However, it is possible that property values of nearby apartments will fall, as amenity impacts become apparent.

*Recommendation 17 – To minimize amenity impacts (with consequent possible fall in property values), Ports Authority (as the Hansons' site lessee) should be required to implement its “3 strikes and you're out” policy if the operators of both the plant and ships making deliveries transgress any of the conditions imposed on both the operations and construction of the plant.*

We summarise recommendations, as follows:

*Recommendation 1: Hansons to be required to restrict its operations (both in receiving raw materials and loading concrete tankers) to 12 hours/day, avoiding night time operations; require Hansons to line the conveyor to the silos with noise insulation; Hansons to investigate early installation of a pipeline to Cement Australia silos to avoid road delivery by tankers.*

*Recommendation 2: Hansons to liaise with Ports Authority and other relevant Government agencies to install a solar power generation and storage facility at*





Glebe Island and require delivery ships to adapt their systems to enable shore to ship power supply.

Recommendation 3: Noise impacts at the residential building/s in Pyrmont closest to the facilities should be monitored and evaluated, and any increases above those listed in the EIS addressed and advised to those affected.

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Recommendation 11 – Hansons to work with community representatives to make representations to Transport NSW to bring forward plans to improve public transport to the Bays Precinct, including Pyrmont.



Recommendation 12 – Parking Management plan to be developed in close consultation with community representatives; the plan to prohibit large vehicles from reversing and using beepers on the site.

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Recommendation 17 – To minimize amenity impacts (with consequent possible fall in property values), Ports Authority (as the Hansons' site lessee) should be required to implement its "3 strikes and you're out" policy if the operators of both the plant and ships making deliveries transgress any of the conditions imposed on both the operations and construction of the plant.

We accept the use of Glebe Island for Port-related activities, but as the concrete batching plant is in close proximity to residential areas, we urge both Hansons and the Ports Authority to work closely with the affected communities to ensure that adverse impacts do not occur and, if they do, prompt measures will be taken to address them.

Yours sincerely,



Elizabeth Elenius, Convenor

