

OBJECTION

Mr Ben Lusher
Director – Key Site Assessments
Planning Services,
Department of Planning and Environment,
GPO Box 39
SYDNEY 2001

14/05/2018

Dear Mr Lusher

Re: SSD 8544 - Glebe Island Aggregate Handling & Concrete Batching Facility

I am upset to read in AECOM's Landscape and Visual Impact Assessment (LVIA) the positioning of the Hanson 34 metre tall silos are to be aligned parallel to the approach of the heritage listed Glebe Island Bridge and aligned parallel to the ANZAC Bridge deck because of '*ease of operation*'. The ANZAC Bridge, a high quality icon, of significance at a state level because of its technical qualities, aesthetics and design features. The positioning of the storage silos within 100 metres of the ANZAC Bridge will have the greatest negative impact on the landscape, a 'blight' on Sydney harbour, and no mitigation measures will reduce the visual impact. AECOM states that the six cement silos may become a new iconic feature of this landscape! Propose commissioning a public art strategy for a mural on the silos. Comparing the Hanson silos to the heritage listed Glebe Island silos is far out!

The ANZAC Bridge needs to be free from nearby commercial obstruction. The silos are incompatible with the ANZAC name and tradition. The ANZAC Bridge can be seen in its entirety from many waterfront public open spaces and views to the landmark structure would be altered by the Hanson project.

Glebe Island is currently used by maritime operations like Waterway Constructions. Sydney City Marine and Cement Australia (where there is very little noise and no attendant cranes or shore vehicles - the impact on even close neighbours is negligible) are welcomed by the residents. Metro Environmental Logistics have been lobbying the government to secure rights to ship millions of tonnes of marine sand (MUF?) and Hanson to get a lease agreement at Glebe Island and bring sand directly from its quarry into the harbour.ii

The Hanson facility designed to produce up to 1 Mcum of concrete per annum, approx. 20,000 cubic metres per week, resulting in 2,600 truck movements per week (to and from plant) - 370 truck movements per day around the clock. The MUF would have the capacity to unload 200,000 cubic metres of sand and aggregate per week – 600 trucks per day. It is impossible for the existing road network to handle such big increases in truck movements coming from GI1 and GI2. The claim by delivering by ship will reduce the number of trucks required to haul aggregates into Sydney on the regional road network by up to 65,000 per annum is disputed. The proposed facility will generate substantially more truck movements than it would reduce.

The two Hanson concrete plants (one near the Fish Market, and the other, a Hymix plant, at 1A Bridge Road) already create noise and dust, and they are both much smaller than the proposed plant. The Bridge Street site is unpleasant to walk past to the Fish Markets, very little has been done

over the years to spruce up the outside appearance of the facility – currently a flimsy sack cloth intermittently attached to a chain wire fence is an eyesore.

The frequency of ships berthing at the eastern wharf at Glebe Island (GIB1) would increase, with large ships 10 tonners (mainly CSL Rhine or like) approximately 10 deliveries each month, every 3 days, 156 ships per year, would be a huge change from the existing situation. Each ship in dock for 12 hours to unload delivery. The adjacent MUF would have 80 ships per year. The total amount of vessels to Glebe Island 1 & 2 would be 236.

Much of the EIS is dedicated to identifying and mitigating the risks of land-based operations, it does not address the risks of ship-based operations as this is claimed to be an existing use right. So, 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. The use of low-sulphur fuel should be mandatory for ships at Glebe Island.

AECOM's reference to Waterfront Park (OL 7) as an Observation Location in the LVIA with visual and night ratings as both **HIGH** – mitigation measure proposed '*consideration of shipping container wall aesthetic*'. Reference to ANZAC Bridge (OL 8) again visual impact and night lighting ratings as both **HIGH** with mitigation measures proposed – '*alternative roof top to silos, mural on silos, shipping container wall aesthetic*'.

The Multi-User Facility (MUF) would be operating simultaneously and adjacent to the Hanson Project, the character of the two facilities similar, both in building form, in truck and shipping activities. The two sites would be visible – the huge MUF storage shed alongside the Hanson staggered shipping container 7.8 m high wall and the silos. The Projects are of low-quality industrial design, at best, a complete affront to the objective of developing a high-tech innovation hub on Glebe Island.

The MUF and Hanson facility have not been designed to co-exist successfully with the residents of Jackson Landing. Zero harm cannot be guaranteed by the proponent and the Port Authority to the health, safety and well-being of the community.

Many tables show as measured from Refinery Drive which is further away from the proposed facilities than 2 Bowman Street which has been identified as the worst affected residential receiver within the NCA.

In SLR Construction Materials P/L *Noise Impact Assessment* - 2 Bowman Street, was not disclosed in the following tables (with asterisk*):

(How can you make certain assumptions - if you don't have the data?)

	Table B*	Page vii	AECOM - Visual Impact and Night Lighting Impact	evolve* 2 Bowman Street Pymont not disclosed
3.2	Table 5 *	Page 16	Summary of RBLs & LAeq Ambient Noise Levels Year 2009 & 2012	
4.1	Table 6 *	Page 17	Intrusive LAeq (15 minute) Construction for Noise Management Levels	
	Table 7 *	Page 18	Precinct Amenity and Project Amenity Noise Levels	
	Table 8 *	Page 19	Project Amenity and Intrusiveness Noise Levels etc	
	Table 9 *	Page 20	Night Time LAF (max) Sleep Disturbance Noise Level	

	Table 14	Page 25	Predicted Daytime - Construction Intrusive LAeq (15 minute) Noise Levels	The predicted daytime noise level for Pyrmont (Bowman Street) is a negligible residual noise exceedance of 2 dBA but remain well below the CNML of 75 dBA – the statement needs clarification
	Table 15	Page 25	Predicted Daytime Construction Intrusive LAeq (15 minute) Noise Levels	
5.1		Page 21	Categories of Vibration in Structures	2nd parra 'the nearest residential dwellings are located in Pyrmont (ie Rfinery Drive) and approximately 300 m across Johnstons Bay' is incorrect it should be 2 Bowman Street approximately 250 m
6.1		Page 22	Noise emission modelling undertaking using SoundPlan version 2 software	Location – 2 Bowman – software not used
	Table 19	Page 28	Predicted Facility Operating Maximum Sleep Disturbance Noise Levels	The predicted night-time maximum sleep disturbance noise level for Pyrmont (Bowman Street) is a negligible residual noise exceedance of up to 2 dBA. SRL then justifies the comment by 'DA reports for Jackson Landing nominate a façade criterion of 63 dBA, effectively reducing the residual exceedance to 1 dBA' (p32 Operation). Can this be clarified and the DA produced showing the many buildings attenuated with sound barriers

Alternative Option: Port Botany, Australia's premium port, 12 km from Sydney CBD, is an appropriate location for the supply of construction materials and should be developed accordingly to cope with future demand - not just for the next 10-15 years but far beyond. It is noted that communications between Hanson and the Port Authority commenced regarding lease negotiations for a period of 20-30 years.

Glebe Island is ultimately inadequate and increasingly irrelevant, as its context and strategic advantage becomes more aligned with urban, commercial, high-tech start-up businesses, tourism and leisure-based-related activities delivering significant benefits for the evolving Pyrmont-Darling Harbour area alongside its rich mix high density residential dwellings. Pyrmont could become Sydney's official leisure and entertainment capital and the second biggest economy in the state. Renewed interest to reopen access point for public transport, pedestrian and cyclists route over the disused 114-year Glebe Island Bridge will be impinged by the positioning of the silos for next 10-15 years.

The state government is urged to invite the tech giant GOOGLE to reconsiders its decision to move its HQ back to The Bays Precinct.

Air Quality: Pyrmont (the area closest to GI1) is a high-wind area, influenced by placement of buildings adjacent high cliffs which creates a tunnelling effect which may influence conditions on Glebe Island. Hanson to seek wind measurements from the corner of Bowman Street and Bank Street to determine their impacts on dust emissions during Glebe Island excavations of both facilities. It is noted that on Peak Operational Days there was a predicted excess of the maximum 1-hour NO2 exposure at evolve*. There are also predicted excesses for 24-hour PM10 at evolve*. To

ensure that the health of nearby residents is not impacted, the report by Pacific Environment adopts criteria to suit the desired outcome which is clearly unacceptable. What about the increased air pollution from ships and trucks? The whole Hanson site needs to be contained (vault) the shipping wall containers are unlikely to mitigate noise impacts for residents at high level in multi storey-apartments eg evolve*.

This proposed facility completely disregards the following principles in the White Bay and Glebe Island Master Plan 2000:

- enhanced environmental performance,
- improve the appearance of the port,
- maintain views of the Pyrmont Skyline & Anzac Bridge as seen from Balmain & 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 measures proposed but not all will be mandated for all operations at the facility, e.g. truck driver behaviours, ship-to-shore power etc

Statements in the EIS suggesting that Jacksons Landing apartments have been designed to cope with noise are both disingenuous and misleading - apartments have in fact been designed with generous opening windows and balconies to aid natural ventilation and reduce reliance on air-conditioning. Many of these facades are primarily glazed, with little ability to attenuate noise. evolve*; 2 Bowman Street, consists of 13 storeys, 47 apartments. A waterfront glazed glass tower facing Waterfront Park with bedrooms and living rooms facing Glebe Island opposite the proposed facilities.

Since 2008 Glebe Island births 1 and 2 have only been used occasionally for shipping unloading activities which can be validated by the Port Authority vessels schedule records. Hence Jones and Johnsons Bay can no longer be classified as continuous high industrial working harbour locations. The gentrification of Pyrmont was approved by local and state/federal governments and should be heralded as a Sydney success story.

24/7: Airport schedules, construction sites, entertainment and sporting venues are subject to curfews and restrictions in recognition of the deleterious effects of incessant loud noise on those who reside nearby. The existing Hanson facilities operating at Bank Street (Hymix) and at Blackwattle Bay (Hanson) do so with a 6:00am to 6:00pm restriction. The notion that transferring these operations to Glebe Island automatically confers a 24/7 licence suggests a commercially driven decision which pays no regard to the needs of nearby community.

Light Spill: The EIS and the Lighting Impact Assessment identifies a high impact from lighting for OL 7. Currently when the lights are used at Glebe Island they cause significant light spill into apartments in Jackson Landing. If the wharf is lit because of the operations of the Concrete Batching Plant, the MUF, also the likelihood of night lighting to ships when in dock it will be intolerable for the community. A no brainer!

Owner/Resident
2 Bowman Street

ACOM also prepared a Construction & Operation Noise & Vibration Impact Assessment report dated 12/01/2018 for the Glebe Multi User Facility

ⁱⁱ Article SMH 31/08/2016 Premier Mike Baird warned: 'Real threat' to Sydney's deep water ports from Bays Precinct