

12 May 2018

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

Dear Mr Lusher

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

I am writing to you to lodge my strong objection to Hanson's proposed Concrete Plant on Glebe Island as this is not an appropriate site for this development. There are a large number of concerns as outlined below:

Summary of Objections

Air Pollution

The proposed Hanson Concrete Plant will be operating day and night (24/7 operation) which results in high level of sulphur emissions from cargo ships/from engines running continuously as they are berthed. The report does not address concerns that emissions from ship engines continuously burning crude diesel which will severely impact air quality as well as water quality. The diesel fumes carried by prevailing winds will create air quality issues in the nearby residential neighbourhood. There is very little coverage and no specific analysis and mitigation measures on the air quality impacts from ship engines running continuously while at berth.

In addition, the dust pollution from the large amount dust particles from the unloading of bulk particles (such as sand) would be blown across the nearby areas including residential blocks and parklands. Exposure to these fine dust particles will have a detrimental impact on health particularly on respiratory systems.

As the proposed facility is only 200-250 metres from residents and public park users, both the air and dust pollution will greatly impact the air and water quality and the health of those within the vicinity of the Concrete Plant. It is unrealistic and unpractical to expect residents to stay indoors (ie. not utilising balconies) or have the windows shut at all times to prevent/minimise these health impacts.

Noise Pollution

The proposed 24/7 facilities will result in engines of vessels/cargos running continuously day and night. This will significantly impact night-time noise levels which is already proven to be in excess of EPA maximum limits as evident in the EIS. In addition, the lack of ship-to-shore power will result in significant noise levels. The noise-levels affecting residents will be above acceptable health limits and will not be manageable, thus hugely affecting the quality of sleep of residents and impacting health conditions. The major source of noise pollution for residents in Pyrmont is ship-generated noise from auxiliary engines and systems. However, ship-

berth noise levels are barely considered in the report. There are no serious measures taken to mitigate this issue because this “activity is recognised as a continued use of the existing port facility 24 hours per day, 7 days a week” which is unacceptable.

The report also argues that the predicted Sleep Disturbance Noise Level (SDNL) is 64 dBA at Bowman Street. However, the report states that this exceedance is deemed ‘negligible’ at less than 2dBA. Further, it is claimed that the building façade external level has been built to a criterion of 63dBA and that, therefore, there is only an excess of 1dBA. This is unacceptable as there is no point in setting a maximum allowable level (NPfI specifies a level of 62dBA) if an exceedance can be deemed ‘negligible’. It is also important to note that the exceeded noise-levels are recorded on ‘Bowman St’ but it is unclear which part of Bowman Street. As mentioned, Evolve (2 Bowman St) is the apartment that has the most significant impact - thus noise levels should be measured and considered at the site, and must not be disregarded/ignored.

It is very important to note that majority (if not all) of the residential apartments/blocks use windows/glazing as the façade material, meaning there is very little resistance to sound transmission. This is further supported by the existing significant night-time noise levels when ships are berthed at Glebe Island with the current level of ship/cargo activities. These noise levels are intolerable for many Jacksons Landing residents and produce significant health issues over long term exposure. This is an area the Port Authority should be familiar with, given the amount of complaints they already regularly receive from the noise-level of ships throughout the year.

Light Pollution

Due to the proposed 24/7 operation, there will be lights on day and night from the concrete plant, Glebe Island berth, cargo ships/vessels and trucks) which will hugely affect the quality of sleep of residents. The suggestion from the Port Authority that residents should remain indoors, with the windows and blinds shut is extremely unreasonable and impractical. The Port Authority completely disregarded the need for residents to breathe in fresh air (ie. allowing windows/blinds to be kept open) is unacceptable.

Traffic Congestion

The proposed development will cause severe local traffic congestion via James Craig Road and Victoria Road to get in/out of Glebe Island. The proposed delivers (120 per hour) equates to over 3000 truck movements per day during daytime shift. At full capacity (24 hours) this would increase to over 5700 per day. The significant truck movements will not only impact traffic in Glebe Island/Pymont areas, it will also impact the Anzac Bridge and surrounding areas/suburbs. As such, the substantial truck-related impacts appear to be overlooked in this EIS. It is important to note that the current traffic condition (without the proposed development) is already very congested.

The significant increase in cargo ships will increase marine traffic and affect marine safety. The cargo ships will be maneuvering and berthing in the narrow waterway

which links Rozelle Bay to Sydney Harbour. In addition, Jones Bay is an existing busy marine which currently already services a diverse range of craft including fishing fleets, yachts, pleasure boats and super-yachts, kayaks & dragon boats, cruise vessels, entertainment boats and ferries. If the proposals were to go ahead, the ships berthed (with no specified limit in numbers) will be within metres of the narrow entrance to Rozelle Bay via the old Glebe Island bridge endangering all marine traffic in the immediate area from the congestion.

Site Suitability

The proposed development of the concrete plant on Glebe Island is not a suitable location. The proposed development is inconsistent with what was envisioned in the 2000 Master Plan which includes cultural, recreation, research, education, retail, residential and maritime. While it is acknowledged that Glebe Island has historically been an industrial area and there are existing use rights as a maritime port, however, there has been no regular, continuous large-scale industrial activities at GIB1&2 since automobile unloading ceased approximately 10 years ago. The precinct has evolved over the last 10 years and the surrounding areas as it has been developed as a significant residential area with large number of apartments and public parks. In addition, the proposed large structures of the concrete plant appear to ignore the intent of the master plan and the spirit and provisions of the plan to avoid placement of large structures along the waterfront or too close to landmarks so that they do not conflict with them or block views of them.

Moreover, the proposed structures completely lack aesthetic value and will be a contrary to the strategic plans for promised future of the Bays Precinct such as the objective of developing a high-tech innovation hub on Glebe Island and the implications for high-quality and innovative buildings.

Cumulative Affects

Both the Hanson Concrete Plant EIS and Multi-User Facility REF outlines the air, noise, light, dust affects however there is no consideration of the cumulative effect of these concerns. With both the proposed development, the 'predicted outcomes' are extremely highly likely to be over the maximum limits. There is no definitive readings/measures available for both proposed developments. This also includes the impact on traffic congestion and marine safety. It appears that EIS completely disregards the obvious severe impacts of both developments to the health and wellbeing of Pyrmont residents.

Furthermore, there is a need to consider other proposed projects such as the Western Harbour Tunnel and Sydney Metro West and its cumulative impacts.

Conclusion

The proposed development with their 24/7 operation would create significant air, noise, light and water pollution as well as the adverse impact on traffic congestion and marine safety. The negative impact of the proposed development will result in increased risk to the health and wellbeing of residents in Pyrmont. As such, the proposed development should not be allowed to proceed.