

14 May 215

**For the attention of:**

The Hon. Anthony Roberts MP  
Minister for Planning  
Planning Services  
Department of Planning and Environment  
GPO Box 39  
SYDNEY 2001

Dear Sir

**Application Number SSD 8544 Berth 1 and land adjacent, Glebe Island, James Craig Road, Rozelle, (Lot 10 DP 11 707 10)**  
**Applicant: Hansons Construction Material Pty Ltd**  
**Council Area Inner West**

We refer to the above named proposed project and herein advise that we object to the proposal on the following several grounds:

The project is not suitable for the area proposed for the following reasons:

- 1 The intended use is not in accordance with the objectives and principles of the Bays Precinct, including the Masterplan of the year 2000 for the White Bay and Glebe Island areas.
- 2 The proposed plant together with the proposal put forward by the Port Authority is not compatible with the significant growth in residential development and population growth within the affected area.
- 3 The introduction of a 24 hour per day industrial facility close to residential premises, creating noise, light, air and water pollution, is not in keeping with the general amenity available to residents of the area and other Sydney siders, who use the public facilities available on the adjacent foreshore (picnic a barbecue areas).
- 4 The reintroduction of significant road traffic in the are as a result of truck movements is a contradiction as the removal of the car terminal at Glebe Island and transfer to Port Kembla, was undertaken to alleviate truck movements and congestion within the areas, it is now proposed to reverse that decision, even in the face of significant population growth in the most densely populated suburb in Australia.
- 5 The noise pollution levels from ships at berth, based on evidence of ship operations, will be in excess of the outcomes predicted in the Environmental Impact Study (EIS).
- 6 Project development of an industrial complex within a densely populated zone can only be detrimental to the health and wellbeing of residents with the resultant pollution of air, light, noise and water.
- 7 The Glebe Island area has not used as a permanent commercial precinct since the closure of the car terminal in 2008, some 10 years ago, the demographic of the area has changed dramatically, along with the closure

- of the CSR operations and the development of Jacksons Landing as a substantial residential development.
- 8 The re-introduction of shipping traffic into the area will disrupt the marine traffic already present in the area and may also interfere with proposals for the development of Black Wattle Bay.
  - 9 Structures proposed are not in keeping with the current development of the area and are a throwback to the industrial eyesores of the 20<sup>th</sup> century, not compatible with the present usage of the surrounding area and amenities.

## **Review of the Proposal**

The proposed Concrete Plant, together with the Port Authority proposal, is not consistent with, and in fact conflicts, with both the Glebe Island and White Bay Master Plan, and certainly does not address the visions detailed in the Urban Growth NSW Plans for the Bays Precinct.

The reintroduction of industrial complexes into the middle of what is now a densely populated area, which the government of the day, was quite happy to promote, now seems to be put aside, whether that be for financial or political reasons, only time will tell.

The residents of the area have populated the area based on certain criteria which did not include an industrial complex being reintroduced to the area. The argument that the harbour is a working port is based on historical concepts not consistent with the modern view of trying to limit the movement of commercial ships in the harbour by providing improved port facilities such as Botany. Matters considered were the removal of congestion on the harbour and congestion on the roads, both of which will increase substantially if this proposal proceeds.

## **Ships, Movement and Berthing**

The EIS gives scant regard to the effects of noise on residents in the immediate area and the implication that the port will be a working port for 24 hours a day 7 day per week. The area has not had a working port since the car carriers ceased in 2008, since that date several large residential towers have been built and occupied.

Ship noise levels are not addressed adequately in the EIS, particularly the transient nature of the noises to be omitted, and there is no substantive information concerning the amplification of the noise so transmitted across open water to residential premises both, directly opposite and adjacent to the proposed development.

Section 3.1 requires "Hanson to consider feasible and reasonable noise mitigation measures but gives no guidance as to the precise outcomes required to bring the project into line with acceptable levels of noise pollution if there is indeed such a position. The Port Authority have little or no authority to impose any sort of restrictions on engine and ventilation noise generated by the ships. There is no provision for ship to shore electricity which means that ships engines will be required to run constantly while they are berthed, the running of the diesel engines will also produce toxic fumes and air pollution. Around the world, cities are banning diesel powered vehicles from entering the city because of the pollution effect, and in this proposal, we are taking the opposite position.

Hanson has no control over the vessels berthing, and to suggest they will co-operate with vessels to minimize the noise and pollution caused by the vessels where it is

“reasonable and feasible” to do so? Who is the judge of what is reasonable and feasible? The same party that is responsible for the change in air, sea, noise and light quality in the first place. Give the prisoners the key to the jail and they will police themselves.

A sound level of 106dBA is recommended by the World Health Organisation (WHO) to last no more than 3.7 minutes in any 24-hour period, this level is not achieved by the proposed project and poses a serious health risk to the residents of the surrounding areas.

The EIS in part, has been tailored to address the desired outcomes for the project rather than process actual factual and historical information, therefore window dressing the outcome to ensure the passage of the project.

There has been a fundamental change to usage of the area, particularly in the growth of residential dwellings, to assume that “existing rights” still prevail after a substantial change in the complexion of the area is both arrogant and certainly misplaced, the use of 24/7 generators should be addressed as per the NSW EPA 2016, and is being discounted because of the presumption of “existing rights”. Those rights no longer exist, they are a remnant of a bygone era when the harbour was heavily industrialised, particularly around the Bays Precinct, those conditions no longer prevail and have not prevailed for at least 10 years.

A document released by the NSW Government in 2015 titled, *The Transformation Plan: The Bays Precinct, Sydney (2015)* states “represents a blueprint to transform The Bays Precinct into a bustling hub of enterprise, activity and beautiful spaces over the next 20 to 30 years. Located within the iconic Sydney Harbour, the area will be enjoyed by Sydneysiders and the global community alike.”

How are the present proposals for the area compatible with this vision?

### **Road Traffic Movement**

The existing road network is considered adequate to deal with the substantial number of truck movements that will be generated both by Hansons and the proposed Port Authority project.

The last occupant of the Glebe Island facility was the car carrier facility, which ceased operations completely in 2012, one of the motivations to moving the facility was to lessen the congestion on Sydney inner city roads. The proposal now undertakes to reintroduce substantial truck movement back into an area that already suffers from extreme congestion. One of the stated aims of the proposed Hanson and Multi User Port Facility projects was to minimise road congestion, air pollution and road maintenance with the removal of 140,000 truck movements. The projections in the Multi User Port Facility document suggest that this will not be the case, it will simply centralise the truck movements into a small compact area, together with traffic from the White Bay Cruise Terminal. The Cross-City Link, Victoria Road, the Anzac Bridge and all surrounding areas will suffer from increased noise and air quality pollution, increased road maintenance costs, which are not paid for by the operators, but by the public purse, so we the tax payers will pay for the privilege of polluting our own neighbourhood.

The EIS is also misleading in some of the assumptions concerning road movements, the EIS does not take into account the projected road movements from the Multi User Port Facility and seeks to assess the truck movement data on a stand-alone basis, this

is neither a factual or truthful interpretation of the reality. Inner city road access is poor as it is as successive governments have failed to take into account the population growth in the inner-city area and address the problems associated with such growth. With more development envisaged for the Black Wattle Bay area, the road systems are barely able to cope at the moment.

## **Conclusion**

There has been a rash of development proposals for the Glebe Island and White Bay area, none of which add anything aesthetically pleasant to the area, not to mention the substantial reduction in quality of living in the most densely populated area in Australia. The projects lack vision, are not suitable for a densely populated area, bring pollution in air, water, noise and light, place industrial complexes in the middle of residential suburbs, may impact upon health and wellbeing of the residents of the area, place extremely ugly structures on the foreshore of the harbour, do not comply with expected environmental outcomes.

The EIS does not address the concerns of the local residents and some of the assumptions in the report are tailored to ensure a required outcome while not taking into account the facts presented, or historical data available concerning pollution levels of differing types.

There is also now the Western Harbour Tunnel project to contend with, none of this is consistent with the Bays Precinct Plan of three short years ago,

We do not make contributions to political parties, or any affiliates, we are simply concerned residents of the area asserting our right to object