Hansen Glebe Island Submission

The impact on the local community has not been adequately addressed in the EIS documentation. There are serious omissions and misinformation in the EIS. These aspects must be addressed prior to any decision being made. The proposed batching plant is a short-term project and will unnecessarily constrain the implementation of the Bays Precinct plan. There is no justified need for hasty decision making.

The claims made in the EIS that this project is appropriately located is founded on claims that do not stand up to critical analysis. The existing heavy rail network could be used for the bulk of supplies of cement, fly ash, aggregate and sand. The supply of aggregates by ship from Shellharbour identified in the EIS is not the only option. The noise assessment includes the statement that other facilities if viable." There are other sources of aggregates and some of these provide rail delivery. For this reason, the proposed batching plant could be located anywhere on the existing rail network for the bulk of its inputs to be delivered by rail. Sites, such as, the Enfield yards would be more appropriate and much better suited as residential areas are more distant. The proposal includes the use of B double road vehicles to move aggregate from this site to other Hansen batching plants. This activity could equally be undertaken from a rail-located aggregate unloading plant. The EIS states that aggregate deliveries will also take place by road when required. This means there is no need for this facility to be located at Glebe Island. The only reason for this plant to be located at Glebe Island is the profitability of the operator.

A further option would be for the batching plant to be located at other ports including Port Botany or Port Kembla. The Port Botany location would provide good access to the inner-city area for delivery of concrete within the 45-minute time frame specified in the EIS. Any change to the financial costs of locating this plant at Botany must be weighed against the costs imposed upon the Pyrmont and White Bay residential areas. It is not appropriate that this externality cost is ignored in the decision making. The EIS is deficient in recognising and detailing the hidden costs imposed upon the residential community. This is not acceptable and is poor public policy.

Site alternatives could have included construction of underground storages, fewer silos, lower height silos and structures, vacuum materials transfer and all activities being conducted under a roofed and enclosed acoustic structure. All ships using the facility could have been required to use ship to shore power and vacuum enclosed conveyors for unloading. The proposed design is low cost and simplistic rather than designed around protecting the amenity of nearby residents.

The claim that structures as high as 35m fit into the existing landscape is not supported. NSW DPE has produced a guideline for the siting of wind turbines and this document, if applied sympathetically towards the Hansen proposal, would reach the conclusion that the project must be redesigned or relocated. The large height buildings and silos are out of character with the landscape and cannot be claimed to be consistent with the heritage silos. The proposed new silos are not consistent with nearby heritage silos. The option of proposing silos of much lower height or fewer silos has not been considered in the EIS. The option to reduce the throughput of materials has not been explored and this would enable fewer and/or lower height silos. It may be that the site is undersized for the proposed throughput. The proponent has failed to include other options and this is an essential requirement of the EIS documentation.

The proponent is seeking a 24-hour 7 day per week operation. However, the proponent is designing its plant around 250 days/year operation. This suggests that the proponent has considerable flexibility in its design "scope" and accordingly, any approval must be based upon minimising the impact to the site's immediate neighbours. The opportunity to operate 24 hours/day, 7 days per week must not be acceded to merely because the proponent wants unlimited operations.

The project claims that an uncovered site provides for a satisfactory level of runoff water quality control. Experience with numerous concrete batching plant sites shows that water quality management is best achieved by covering of all areas where deposition of concrete and raw materials can occur. The EIS claims that roof water quality is "generally good" and this qualified statement reflects the known failure of air emission controls on concrete batching plants. Covering of all external areas where spillages can occur is the standard that should be expected of this site given its location and proximity to residential areas.

The claim by the proponent that the DCP discharge limits for runoff are appropriate for a concrete batching plant is not supported. Any discharge must be designed around the existing water quality and the Australian Water Quality Guidelines. The discharge limit of "an average annual load reduction" is unrelated to the water quality in the surface waters and totally unrelated to the AWQGs and scientific methodology. The proposed discharge limit for total suspended solids of 114.8mg/L is far in excess of that which should be allowed under the AWQGs. The proposed sampling of once per month is not accepted. Sampling must be performed after each rain event and within 30 minutes of the commencement of any discharge. The appropriate parameters must be based upon an analysis of the discharge using AWQGs. The use of TN and TP monitoring parameters is more relevant to residential areas rather than a batching plant. The selection of "Enviropods" as a water quality control technology is the full responsibility of the proponent. There is insufficient information in the EIS to assess the wastewater treatment plan and whether it is capable of satisfying AQWGs. The construction management plan is equally vague proposing that "runoff will be tested during construction….a site audit undertaken to identify the source of the pollutant." This proposed approach will not protect the environment and is not satisfactory.

The claim that the site construction will only generate 13 tonnes of concrete waste and 10 tonnes of bricks in the construction of the plant suggests that the construction work will entail reusing the existing site hardstand area without any disturbance. This claim suggests that the proponent considers the existing concrete to be suitable for the erection of the site buildings and roadways. With an acknowledgement that fill was imported in the past, the suitability of filled areas and unknown geology strongly suggests that the waste management proposal is at best hopeful rather than realistic. Waste management appears to have presumed that no contaminated materials will need to be removed from the site. Past history of contaminated waste being dumped at unapproved sites requires that this project must have a more rigorous process in place to ensure that site wastes are only disposed of at approved landfills.

The Noise assessment states that existing noise in the local area is dominated by traffic noise. It is significant that this has now been recognised though too late for the required setting of noise limits for the White Bay cruise shipping facility.

Noise from shipping is effectively unregulated in Sydney Harbour. As Ports NSW depends upon shipping for its income stream, it is potentially compromised in any regulatory activity. Experience

has shown that Ports NSW has been ineffective in regulating noise generated by cruise ships at White Bay and is also unresponsive to the regulation of oil tankers at Gore Bay. The EIS states that "port facility noise levels have at times exceeded noise planning goals." Ports NSW has blamed the proximity of residents whereas that Ports NSW has failed to regulate shipping noise. Continuous night time tonal noise levels over 60dB(A) in residential areas (with night time background noise levels under 40dB(A)) have not been addressed by Ports NSW. The EIS has not included cumulative emissions from shipping using nearby facilities (Table 20). The failure of Ports NSW to regulate shipping noise coupled with the exclusion of cumulative shipping noise from the noise model is unacceptable. This is contrary to that followed in the approval of the White Bay cruise ship facility. The Hansen project involves the establishment of a new ship berthing and aggregate unloading facility. This requires approval and cumulative noise from ships while in the harbour must be assessed as part of this EIS. It is not acceptable for the proponent to effectively ignore noise from shipping in the EIS. The inclusion of other options and modification of the project to reduce impacts must be integral to the EIS. This situation must be corrected and addressed prior to any approval of this project.

The proponent makes the following statement "Measures to minimise berth activity noise levels……will be considered by Hanson in consultation with the Port Authority of NSW." This statement of intention amounts to doing nothing based upon the past activities of Ports NSW. This is never an acceptable measure to protect the health and amenity of nearby residents.

The EIS fails to identify the noise reduction option of providing ship to shore power for all ships delivering aggregate. This would reduce operational noise and remove a significant source of air pollution. It is a feasible and reasonable option for this project.

The cumulative noise assessment appears to neglect noise impacts arising from nearby noise generating activities including WestConnex, the Ports Multi user facility, the Western Harbour Tunnel construction and the exiting Ports facilities including the two White Bay berths. The rationale for claiming that construction activities for this project should be assessed separately to nearby construction and operational activities appears to originate from the Interim Construction Guideline however there is no scientific research which supports the claim that residents will be less annoyed by the "construction" noise arising from this project. The construction works is to take 9 months. This duration is well beyond what residents might class as short term. Without a credible justification, this project must be assessed against established scientific evidence rather than unintended gaps in the guidelines.

The noise assessment adopted the "Noise Management Precinct" included in the NPfi. This action is an attempt to protect existing residential amenity. There has never been any public consultation on the declaration of the port area being a noise management precinct. It would be highly contentious to retrospectively over-ride residents right to protect their current and future amenity by such an action. For this reason, the contents of Table 7 should be ignored in the assessment of this project.

The inclusion of comments in the noise report relating to consent conditions on some residential properties in the vicinity of the site is not helpful. This does not provide justification to permit higher noise emission levels from the plant. The noise controls do not apply to all residences in the locality. Further, the residences concerned do not have acoustically sealed glazing and mechanical ventilation and hence any assessment must allow for open windows and doors.

The noise criteria were based upon ambient noise data obtained from 2012. This is now 6 years out of date. More recent data should be obtained. The noise criteria for Balmain and Pyrmont claim the urban industrial interface criterion applies. This has not been justified. To do so, the proponent must provide data which shows where noise levels from shipping activity has reduced by 5dB(A). Without justification, the proponent must use the urban classification as used for Glebe.

The noise assessment fails to consider cumulative noise from WestConnex construction and operation, the Western Harbour Tunnel project and cumulative shipping noise that would arise when other ships are berthed. Section 2.4.2 of the NPfi defines the process for multiple sites cumulative assessments.

The traffic assessment has not identified the risk of heavy vehicle accidents arising from overturning when vehicles turn left off the City West Link into James Craig Road which has insufficient camber. This turnoff should be reconstructed and separation provided so that an overturning vehicle cannot roll into vehicles entering City West Link. A brake failure of a left turning heavy vehicle would cause considerable damage and risk to other motorists, pedestrians and cyclists.

The traffic assessment has included an optimistic effect of the construction and operation of WestConnex on the predicted future traffic counts. This is not acceptable. The construction of WestConnex has been forecast by some traffic modellers to have a significant adverse effect on local traffic movements. Peak hour flows into and out of the site can be expected to become challenging. This would cause other times to be used for vehicle movements. It may even cause concrete deliveries to be made from other batching plants. The final design of the Rozelle interchange has not been determined. Cost savings on this project may dictate a lower cost option and the impact on the proposed batching plant would be unknown.

The claim that the site has “excellent cycling access” omits the opportunity for cycling access to be provided by the reopening of Glebe Island bridge. The existing cycle access involving riding over Anzac Bridge is not supported because of the high levels of air pollution caused by motor vehicles. Air pollution exposure to cyclists and pedestrians would be reduced due to the distance separation this measure would provide.

The air quality assessment is based upon the Australian and NSW guidelines. However, some of these criteria are obsolete with respect to World Health Organisation (WHO) 2005 and criteria used in developed countries. The Australian criteria arise from agreement between State and Commonwealth Environment Ministers. The process by which these criteria are finalised is not driven by public health. Political considerations are taken into account and the time scale for decision making is well beyond the latest criteria for protection of public health. Criteria for SO_2 and NO_2 in particular are much lower than that used by the proponent.

WHO 2005 criteria are:

NO_2 – 1 hour mean 200µg/m^3 and annual mean 40µg/m^3

SO_2 – 24 hour mean 20µg/m^3 and 10 minute mean 500µg/m^3

An assessment of this project against WHO air quality criteria for cumulative emissions would cause this project to be rejected on the basis that NO_2 concentrations would be exceeded. The “assumed”

ozone limiting factor for NO_2 concentrations is not based upon actual site information. There is no data for existing NO_2 concentrations in the nearby residential areas taking into account emissions from the Anzac Bridge roadnetwork.

The EIS uses air quality monitoring data obtained by OEH at Rozelle claiming that this data represents the local area. This claim is not supported by the two-week monitoring of NO_2 conducted by the consultant in a nearby location well away from Anzac Bridge relative to the nearest residents. Emissions from the Anzac Bridge road network are yet to be monitored and assessed.

$PM_{2.5}$ monitoring performed at White Bay infers that the Australian criterion for long term $PM_{2.5}$ will be exceeded. The proponent claims the exceedance at White Bay is caused by localised wood burning. Even if it is caused by wood burning, the addition of emissions from this project will cause an even higher level of $PM_{2.5}$. This does not justify the project.

To ignore local air quality, the proponent claims that the air quality assessment should be conducted against the urban background levels. This is false as the assessment must be made against the existing air quality at the location of this project. Without adequate assessment of the existing air quality, it is not possible to make a proper assessment of the impact of this project.

The claim made that “assumed” existing air quality satisfies the requirements for an EIS is false. The EIS must include actual measurements of existing air quality. The claim that the OEH Rozelle monitoring station is representative of air quality in Glebe Island/Pyrmont/White Bay/Rozelle is false. The “assumed” background numbers have not been justified by air quality monitoring in the vicinity of existing residents. Further, the proponent has failed to identify emissions from each of the other developments that are known to occur in the local area. The “assumed” background numbers do not include any contribution from the other developments. Consequently, the air emissions assessments has failed to identify the cumulative emissions arising from this project and each of the other known developments in the immediate locality.

The existing dust deposition rate cannot be assumed to be 2g/sqm/month because that is a convenient number. Dust clouds evident from the land disturbance in the Rozelle Goods Yard would be expected to contribute significantly to current dust deposition in the subject locality. Dust from the Anzac Bridge network has not been considered to be a contributor to dust deposition. The OEH Rozelle site does not have land disturbance nor a road network like Anzac Bridge as close to it as is the case at Rozelle/White Bay/Pyrmont.

The use of the obsolete Australian criteria also has a more serious effect. In the case of SO_2, the “assumed” ambient level of SO_2 is greater than that provided in the WHO guidelines. When the other developments in the locality are included, this project will simply increase the degree of exceedance of accepted health guidelines. This is not acceptable.

Based upon the above analysis, this project is not an acceptable development in the proposed location and scale of development.