

I live in the residential apartment building at 8 Hickson Road, The Rocks. This building is located directly opposite the Campbell's Stores building - currently a building site in the process of re-development - and also overlooks part of the area used by cruise ships, whose PA systems operate from as early as 5 am and whose messages are broadcast throughout adjacent areas of The Rocks at all hours during the day.

My home is within Campbell's Cove and opposite the area of the proposed 'public domain improvements and associated work' outlined in Property NSW's *Response to Submissions* to SSD 7246. The physical nature of the public domain improvements along the Campbell's Cove foreshore is appealing and should enhance the area. The proposals for achieving the 'associated works' are not. They would have a significant negative impact on the amenity of residents and guests within our building. For that reason, I object to what is proposed.

## **THE PROCESS**

I also object to the inadequate exhibition period. Reading reports and technical data is not like reading 'page turner' novels. It requires more time and concentration. The one-month exhibition period was inadequate for members of the public to read, digest, consider, evaluate and adequately respond to the 22 reports within the *Response to Submissions* and the total 452 pages of text, diagrams photos and photomontages they comprise. This time frame denies people the right to be able to respond to SSD 7246 as a whole.

Additionally, I'm concerned that in the guise of a 'Response to Submissions', the Applicant is effectively lodging an amended DA. This proposes a dramatic change to the original application with working hours to incorporate night shifts from 6 pm to 10 pm. This should have been put forward at the time SSD 7246 was first lodged. Inserting it in the Responses' documentation means that people who initially did not lodge objections are not necessarily aware of the proposed four-hour extension to the work day. The Park Hyatt Hotel at the northern end of the site and the Holiday Inn at the southern end, would be especially affected by this.

## **THE NATURE OF INFORMATION PROVIDED**

Much of the issue-specific information can only be found across a number of appendices and, in some sections, is confusing, contradictory and/or erroneous and misleading. The Civil and Traffic Response Part 1, (Appendix H, p.16) states that the working hours would be 7 am to 5.30 pm Monday to Friday and 7 am to 5 pm on Saturdays. It makes no mention of extended hours.

This contradicts the information Urbis provided, in the Response to Submissions Report. This states that the standard day shift working hours will be until 6 pm Monday to Friday and 8 am to 1 pm on Saturdays. Urbis also requests night shifts (6 pm – 10 pm) to operate on days when there are cruise ships moored at Circular Quay. I assume the report from Urbis is the accurate one and that the authors of the Traffic report were addressing outdated information.

The Construction Management Plan (Appendix I) erroneously lists the Metcalfe Bond Building as being on the southern end of the site. It is to the west of the site. In the case of the EPA Report found in Annexure B of Appendix I, what is submitted seems to be related to Sydney University Regiment Mixed Use Development' and not Campbell's Cove at all – an example of an unfortunate 'cut and paste' approach, despite the relevance of much of the comments it

contains. Mentions of 'ship days' in various appendices imply that these are infrequent. This is grossly misleading.

Some of the consultants' reports appear to be still in draft form, containing maps and data that have been superseded.

That said, my objections are primarily based on issues related to working hours, noise control/mitigation, vehicular access and the Applicant's failure to consult or consider affected residents.

## **WORKING HOURS**

The proposed extended night shift working hours from 6 pm to 10 pm five nights a week are unacceptable as they would have a huge negative impact on the amenity of residents in 8 Hickson Rd. The Construction Management Plan states that 'extended hours will be limited to ship days only and the works will be generally limited to the removal of site spoil and deliveries' (Appendix I, p. 10).

This wording glosses over the significant negative impact of this. Compared to 22 ships/year when I moved to The Rocks in 2002, ship days are now fairly constant from September to April. In cruise ships' peak period alone - January to April - ships are here every day. That represents 100 nights of work between 6 pm and 10 pm during the peak period (one ship/day) in addition to a potential 50-100 nights of work between 6 pm and 10 pm from September to December when there is generally, but not always, one ship/day. The Cruise Ship Calendar (Annexure C) to date indicates about 37 ship days from May to August 2018. In other words, the majority of days will be 'ship days'.

The Port Authority has imposed the condition of no vehicular access to the foreshore site on ship days. This is understandable given existing traffic congestion on these days. If, as Urbis' Response to Submissions' states, the creation of this Campbell's Cove promenade is so significant to creating 'Brand Sydney', then it seems that the Port Authority should bear some of the burden rather than have it all placed on local residents. The Port Authority should be limiting the number of cruise ships allowed during the construction period. There is no independent evidence of shipping companies' claims of their economic benefits to Sydney's economy and the limitation on working hours they impose on this project is just another example of cruise ships' cost to the local environment.

'Generally limiting' the nature of works on ship days (Appendix I) is vague and provides no guarantees for local residents. Equally, limiting night shift work to MAINLY 'the removal of site spoil and deliveries' does not provide any protection for locals from the beeping noise of trucks reversing, the noise these activities generate or the noise of night shift workers carrying out these activities.

This means that, for five days a week, over the proposed eight-month construction period, working hours could potentially go from 7 am until 10 pm each day. Our evenings along Hickson Road would potentially be subject to noise generated by construction work, the delivery and unloading of building materials, waste material removal and the presence of trucks and workers waiting for job start or going in and out of the worksite.

## **NOISE AND VIBRATION MANAGEMENT**

There is no stand alone response to this in the current documentation. The response to submissions (p. 29) about noise and vibrations is to fail to provide any concrete proposals at this stage and to promise to prepare ‘a noise and vibration management plan’ at some stage in the future. A satisfactory plan needs to be delivered PRIOR to consent. Otherwise, there is no protection for anybody – residents, construction workers, visitors or business people.

The noise mitigation proposals within the (draft) Construction Management Plan (Appendix I, p.11) are useful but the statement that ‘All complaints in relation to noise will be monitored and recorded’ does not provide any form of protection or redress for affected local residents. We shouldn’t need to complain if the applicant is required to provide details of specific measures (not just list recommendations) of what is proposed to be done.

The original noise and vibration study did not address the impact of noise during extended working hours as this proposal was not part of the original development application. Without an assessment of this impact, there should be no consent to work after 6 pm.

Any valid noise study needs to consider the cumulative impact of noise in Campbell’s Cove – from cruise ships, the Campbell’s Stores building site as well as operational noise from work associated with foreshore and public domain works in Campbell’s Cove. This has not happened.

The Applicant has to adopt noise mitigation measures like acoustic matting on fences and construction and delivery vehicles need to use ‘quacker type’ movement/reversing alarms instead of the loud and aggravating traditional beepers.

In the event of night shifts being allowed, then all particularly loud activities – e.g. cutting of paving slabs, demolition - should be specifically prohibited from this period. They should also be explicitly prohibited before 8 am.

## **VEHICULAR ACCESS**

There should be no vehicular access via the space between Campbell’s Stores and the Park Hyatt Hotel (as proposed in Appendix I, p.14). This is the most sensitive part of the site for local residents. The use of this as a ‘service road’ would mean that truck noise would be ongoing and vehicular access to our own property immediately opposite could well be restricted. Vehicular access should only be from Circular Quay West at the southern end of the site.

## **COMMUNITY ENGAGEMENT**

Finally, consultants’ claims of ‘community engagement’ (e.g. p.7 Appendix I) are a joke. Contrary to normal practice, neither the applicant (PNSW), nor its consultants, have made any attempt to contact local residents or ‘engage’ us prior to the initial exhibition of SSD 7246 and equally, have made no attempt to do so in the period since either.