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Attention: Karl Fetterplace ([karl.fetterplace@planning.nsw.gov.au](mailto:karl.fetterplace@planning.nsw.gov.au))

Dear Cameron,

**Re: Response to Submissions for SSD 8544 – Glebe Island Concrete Batching Plant**

This letter has been prepared by Port Authority of NSW (Port Authority) in response to the Environment Protection Authority's (EPA) submission dated 19 February 2020, on the Response to Submissions for SSD 8544 – Glebe Island Concrete Batching Plant (the Hanson development). It also provides commentary on the Further RtS dated 11 June 2020.

The information in this letter is intended to provide clarity to the Department of Planning, Industry and Environment particularly in terms of proposed noise limits for the development and how these limits should be compatible with the draft Port Noise Policy for Glebe Island and White Bay, developed by Port Authority in consultation with EPA.

The draft Port Noise Policy is available here <https://www.portauthoritynsw.com.au/noisepolicy>.

**Proposed noise limits**

Port Authority's main areas of concern with EPA's proposed noise limits for the Hanson development relate to:

- selection of the most appropriate vessel noise limit;
- specification of limits for landside noise, as distinct from vessel noise limits;
- inclusion of meteorological effects in setting limits should not inadvertently lead to more stringent conditions at Balmain/Glebe vs. Pyrmont; and
- compatibility with the Port Authority's proposed Port Noise Policy, which includes a noise precinct approach for landside noise.

**Vessel noise limit**

EPA's proposed noise limit as outlined in their submission includes both landside and vessel noise. It is considered by Port Authority based on information contained in the Hanson EIS, the RtS, and noise monitoring of vessels undertaken by Port Authority, that the noise level assumed for the vessel is too low which may make the EPA's proposed noise limit unachievable.

Port Authority's review of the EIS identified that the noise level used to predict the potential impact of vessel noise was much lower than similar types of vessels that have used the port in the past and will be using the same berths (berth 1 and 2 at Glebe Island) to service the Port Authority's Multi-user facility (approved in 2019).

The noise levels in Hanson's EIS equate to 50dBA to 51dBA from the vessel while unloading via conveyor, at the nearest receiver. The EIS did not contain verifiable measured data to support the assumed noise level.

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Based on available data provided in the EIS and results of vessel noise monitoring undertaken at the port, Port Authority has some concerns that this noise level would be achievable. Nevertheless, Port Authority notes that the Further RtS indicates that this level would be achieved.

Hanson subsequently prepared a revised estimate of the potential range in vessel noise levels, and this was presented in the RtS. Table 20B of the RtS shows an upper range in noise levels and has a vessel unloading with a noise level of between 57dBA to 58dBA (noise from the batching plant is negligible with this vessel operating). Based on Port Authority's noise monitoring data this noise level would be at the upper 10<sup>th</sup> percentile for these types of vessels.

Hanson's RtS (page 8) reports a median noise level for vessels of this type of 55dBA, based on Port Authority's monitoring data.

In summary, Hanson's RtS reports the following range in potential noise levels for vessels using the proposed facility.

Range	Vessel noise level, dBA
Low estimate	50-51
Verified measured median	55
Verified measured upper 10 <sup>th</sup> percentile	58

Port Authority has committed to a noise criteria of 55dBA at night for vessels using berths 1 and 2 at Glebe Island for the approved Multi-user Facility, being the same berths to be used by Hanson. It is considered this is a reasonable noise limit that has certainty in being achieved. It will act to exclude the noisiest 50% of vessels from using Glebe Island at berths 1 and 2 at night.

Port Authority understands the vessel proposed by Hanson would be a dedicated vessel under a longer term agreement. The lower estimated vessel noise level would be consistent with the Port Authority's draft Port Noise Policy and Vessel Noise Operating Protocol and the Protocol's more stringent medium to longer term noise goals.

Port Authority however recommends a consistent limit be defined for vessels servicing the Hanson development. It should be noted that in some instances the same vessels may service both the Multi-user Facility and the Hanson development.

#### **Landside noise limit**

EPA's proposed noise limit combines both landside noise and vessel noise as a single limit. This could be problematic when a vessel is not at berth, as the batching plant could operate in compliance with the proposed limit, whilst at significantly higher noise levels than was proposed in the EIS and RtS. These higher noise levels have the potential to cause an unreasonable noise impact and the associated noise limit assigned to the landside activities would make it difficult for other operators and the broader port to meet overall noise criteria being considered in the landside precinct being proposed in the draft Port Noise Policy.

Port Authority recommends that separate landside noise limits are set for the operation of the Hanson development.

The batching plant is proposed to be permitted to operate on a 24/7 basis. Our understanding is that the batching plant will likely have more intensive periods of production. Peak demand may occur during the night time period for a limited number of hours to support construction involving road and rail possessions or to supply city construction sites when traffic flows are low. This is reflected in the EIS where short term noise levels, which meet the Noise Policy for Industry intrusiveness criteria, are higher than the 9 hour amenity noise levels for the night time period.

On the above basis, Port Authority suggests that both 15 minute and period  $L_{Aeq}$  noise criteria are set for landside activities associated with the batching plant. This may be based on the predicted noise levels in the EIS for the batching plant operating in isolation with some allowances or the assumed criteria in the EIS.

### Meteorological effects

It is noted that some of the EPA's proposed noise limits have a 5dBA allowance under noise enhancing conditions. However, this allowance has not been applied to Stability Category E and F conditions which are generally associated with temperature inversion effects.

Whilst it is unlikely that Category E and F conditions will significantly change noise levels at Pyrmont, this may not be the case at Balmain and Glebe as these suburbs are significantly further from the proposed batching plant.

It is suggested that a 5dBA allowance is applied to Category E and F conditions for compliance measurements at Balmain and Glebe.

### Compatibility with Port Authority's proposed Port Noise Policy and noise precinct approach

The Port Authority has developed a draft Port Noise Policy which outlines future noise management for the port under a noise precinct. Noise precincts were introduced by the EPA's Noise Policy for Industry in 2017. To provide compatibility between the proposed Hanson development and Port Authority's draft Port Noise Policy, Hanson requested a modification to their SEARs so that it may be assessed under the Noise Policy for Industry.

Using the precinct approach, Hanson's proposed batching plant and the Port Authority's multi-user facility were co-developed by redistributing noise criteria from a superseded facility.

The outcome of this precinct approach was that the combined noise emission from the multi-user facility and Hanson's batching plant meet overall amenity noise criteria for the port.

### Recommendation

The suggested vessel limit, as outlined above, is consistent with the draft Port Noise Policy which is currently being developed by Port Authority in consultation with EPA. The target noise level for the vessel should reflect the median value of 55dBA  $L_{Aeq}$  in Hanson's RtS. This is consistent with noise targets in the Port Authority's draft Port Noise Policy.

Existing tenant operator noise limits at the port relate to industrial criteria and are similar to the criteria used by Hanson in the EIS in the tables below. Under the Port Noise Policy noise levels from all operators will be reviewed in consultation with the operators and new limits set, where required, so that individual landside noise limits from all operators sum to a level that complies with the Noise Policy for Industry's amenity noise criteria.

The predicted noise levels for Hanson's landside activities are consistent with noise limits that would be set for the operator under the Port Noise Policy. Port Authority has confirmed with Hanson that the predicted levels are achievable. Under the Port Noise Policy the maximum permissible noise levels would be the predicted noise levels.

Table 1 Landside  $L_{Aeq}$  Period Levels

Location	EIS Criteria			Predicted Levels		
	Day(11hr)	Evening(4hr)	Night(9hr)	Day(11hr)	Evening(4hr)	Night(9hr)
Donnelly St, Balmain	60	50	45	40	36	34
Batty St, Balmain	60	50	45	43	40	37
Bowman St, Pyrmont	62	52	47	51	47	45

Location	EIS Criteria			Predicted Levels		
	Day(11hr)	Evening(4hr)	Night(9hr)	Day(11hr)	Evening(4hr)	Night(9hr)
Refinery Dr, Pyrmont	62	52	47	46	42	41
Leichardt St, Glebe	55	45	40	38	34	33

Table 2 Landside  $L_{Aeq}$  15 minute Levels

Location	EIS Criteria			Predicted Levels		
	Day	Evening	Night	Day	Evening	Night
Donnelly St, Balmain	52	50	45	43	41	39
Batty St, Balmain	56	53	50	46	45	42
Bowman St, Pyrmont	55	54	52	54	52	50
Refinery Dr, Pyrmont	55	54	52	49	47	46
Leichardt St, Glebe	51	51	45	41	39	38

Port Authority's considers that the noise limits proposed by the Port Authority are also consistent with the approach defined in EPA's Noise Policy for Industry. The Noise Policy for Industry allows the use of alternative noise targets for existing sites, such as the port, as outlined in Section 10.

We trust this information provides clarification regarding Port Authority's concerns with the proposed noise limits provided by EPA in their submission on the RtS for the proposed Hanson development. Should you have any queries please do not hesitate to contact Christa Sams, Environment Operations Manager email [csams@portauthoritynsw.com.au](mailto:csams@portauthoritynsw.com.au) or 0437 001 409.

Yours sincerely,



**Amy Beaumont**  
Group General Counsel

19 June 2020