

evidence of a threshold below which exposure to particulate matter does not cause any health effects.
Health effects can occur after both short and long-term exposure to particulate matter.”

It was estimated that in 2009 in NSW there were 12,000 additional deaths largely due to particulate pollution from combustion.

The Australian Incremental Guideline for Particulate Matter (PM_{2.5}) To Assist in Development and Planning Decisions published by the Sax Institute says, “No threshold has been identified regarding PM_{2.5} levels that are not associated with health impacts. Therefore, any exposure to PM_{2.5} is associated with a risk.”

There is no basis upon which such a risk should be approved in circumstances where a land based electricity supply can be made available in order to obviate that risk. The absence of a land based electricity supply to shipping should be fatal to this application.

And in the event that the proponents of this application might suggest that the ships will save truck movements, most ships burn heavy fuel oil, which is the dirtiest fossil fuel available. Most ships also do not have any diesel particulate filters or selective catalytic converters to clean the exhaust – technologies that are standard for road vehicles like trucks. Currently heavy fuel oil contains 35000ppm sulphur, which is 3,500 times more polluting than road diesel. And the proponents have given no indication as to the type of vessel which will be employed saying only that shipping capacity will depend on what is available in the market at the time.

CO2 Emissions

The ship exhaust is also a source of CO2 emissions. At a time when we are all well aware of the impact of these emissions on the climate of the planet and all levels of government are striving to reduce our carbon footprint, there is no basis upon which the emissions associated with engines kept running while ships are berthed, should be approved in circumstances where a land based electricity supply can be made available in order to obviate the risk.

Conclusion

It beggars belief that in the third decade of the twenty first century, in the middle of a world class city, in a state suffering high numbers of particulate induced deaths, in the middle of a global climate crisis and after the lessons that should have been learnt from the White Bay Cruise Terminal, a consent authority is still considering approving a development without the provision of a shore based electricity supply to prevent ships from running their engines while berthed.

This proposal should be rejected in whole, or at the very least made subject to the provision of a shore based electricity supply for ships and stringent conditions attached to the running of ship’s engines while berthed. It would also be appropriate to attach conditions to berthing ships relating to their general CO2 and particulate emission levels. To do anything else at this time in history is an abrogation of proper planning responsibility.

Response to the letter from Planning Industry and Environment to the IPC dated 28 May 2021, Attachment A, paragraph 2(b).

While the Department has made a planning sub-precinct at Glebe Island East sufficiently defined to allow an integrated ports facility including concrete batching and the use of existing berths, the rest of the precinct remains largely unplanned. The Department recognises this when it says, “To ensure

future uses can coexist, the Department recognises that further detailed planning of the sub precincts would need to take place to minimise any land use conflicts. Future master plans, rezonings, buffer zones, DCPs, development applications and new emerging technologies, will play an important role in managing potential land use conflicts at the site.”

The proposed development is isolated and *ad hoc*. The Department is effectively saying that the land use for this sub-precinct is set in concrete and all other sub-precincts will have to adapt to it.

For an area as large and significant as the precinct, piecemeal planning of this type is inappropriate. There should be a master plan developed for the whole precinct with community consultation, in which the uses of all sub-precincts are set out, before **ANY** development takes place within the precinct.

Regards

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