

3 June 2021

Mr Gavin Waldin

Ms Annelise Tuor and Dr Peter Williams
Chair and Panel member of the IPC
NSW Independent Planning Commission
By email

Dear Ms Tuor and Dr Williams,

Re- The proposed Concrete Batching Plant and associated increase in truck movements and shipping for Glebe Island

We would like to make a further written submission to follow up on our previous written and verbal submission at the public meeting.

We thank you for the opportunity to be further informed of the IPC requests to the applicant following the meetings of the 6th and 17th May 2021.

Introduction –

We have reviewed the responses provided by Ethos Urban, presumably provided by Hansons and the applicants team. The responses seem extremely high level and lack the sort of specifics that is required to justify their proposals and answer your questions.

To assist with your consideration of these matters we have undertaken some research which we hope will provide the sort of information you were seeking. This is set out below and in the Appendix to this letter.

It appears that the intended operation of the batching plant including all ship and vehicle movement is based on Hansons desires for unlimited and unrestricted operation ie their commercial imperatives with no real consideration for the major impacts that such an operation strategy has on the residents who already live in this locale and have prior claim on a reasonable expectation of positive amenity and quality of life. The operations at the port have been gradually reduced over the past 15 years to a low level that does not impose a major impact on the increased density now around the port or the areas of Rozelle and Balmain that have risen in value over time and gentrified due to the cessation of port operations.

It is also noted that the residents of these areas opposed both the overseas passenger terminal and the Multi – user facility because of the impacts of the ship noise on residents. It is our understanding that the Port Authority proposed both these developments and approved their own developments despite major concerns from the local residents. To add further to these impacts and in no way seek to ameliorate the noise generated from both these uses is most unreasonable. The Port seeks more profits at the expense of the quality of life of the residents and their property values. For government to support such an approach is abhorrent and certainly does not engender an assurance for the public (who fund the government after all) that their interests are being considered or given any weight.

Hours of operation, the impacts of the number of ships required –

Point 2 of the response from Ethos Urban states that *'all of the Hanson concrete plants in Sydney have historically operated 24 hours a day to meet market demands'*. However, they provide absolutely no detail and no proof of this history or operational hours. They also provide no information of plant locations where 24 hour operation occurs or proximity to residential uses, particularly high density residential areas (such as this situation). I also note that none of the existing plant locations result in both truck and SHIP movements and consequent noise, fumes and visual impact. The ship engines and the noise of the equipment on the ships used in unloading creates a major noise impact and nothing in the documentation considers or quantifies these impacts.

In fact, all the documentation for both this and the Multiuser facility ignored the shipping impacts. This approach would only be reasonable if the operations of both maintained the current number of ships using the 2 berths. Both developments seek to increase shipping numbers, duration and frequency.

The increase in shipping numbers by the batching plant is huge. Currently we experience a ship at the Glebe Island berths about every 2 months or so and they stay between 2 days to a week at most. This can be checked by viewing the Port Authority vessel movement logs over the past year or so. So based on the time we have been here this would be around 6-8 ships per annum. Most ships that enter the port go down to the existing silos which are also near the power station and the industrial warehouse area. Hence why we put forward the proposition that extension of those silos and locating the plant (if such a use is considered appropriate and necessary- which we question) in that area is more appropriate given it already hosts similar activities and has 2 available berths with cement carriers using both at times.

Hanson seeks specifically to be able to move 1 million tonnes of material by ship per annum. The stated capacity of the ships is between 4,000 tonnes and 13,000 tonnes. This equates to 250 ships a year if the smaller ships are used or 77 ships if the larger ships are used. Hanson states they will stay 12 hours- we seriously doubt this based on current experience. The ships that go to the existing silos normally stay a week with engines running all day and all night. The ones that use Glebe Island stay between 3 days to a week. Therefore, for the smaller ships (which is likely given the restriction of height of the Harbour Bridge) this would equate (assuming shorter visitation of 3 days) to 750 days of occupation ie use of both berths 375 days – this is more than a calendar year and would mean constant unrelenting noise from the ships. If it was the smaller ships.

If it's the larger ships this would still equate to 231 days use of the berth however our experience is that the larger ships take longer to unload so therefore if they stay a week (which happens now) this equate to 77 weeks ie one berth all year and the other half a year.

This is not a reasonable impact or acceptable.

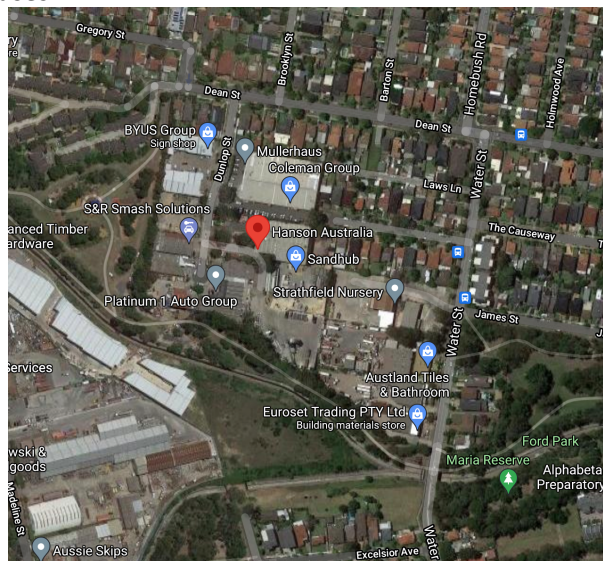
We also note that Hansons Concrete is not an Australian owned firm but a subsidiary of a German parent company. This company also owns, or part owns, a number of other concrete companies including Hymix, Cement Australia, Pioneer Concrete. So Hansons owns and operates a huge number of existing concrete batching facilities which could provide additional capacity within existing industrial precincts rather than imposing the impacts of a new plant in an area surrounded on 3 sides by residential development and that has not hosted heavy industrial uses for around 15 years.

We reviewed the Sydney concrete plants owned by Hanson and most of the facilities list their hours of operation on either the website or on Google Maps.

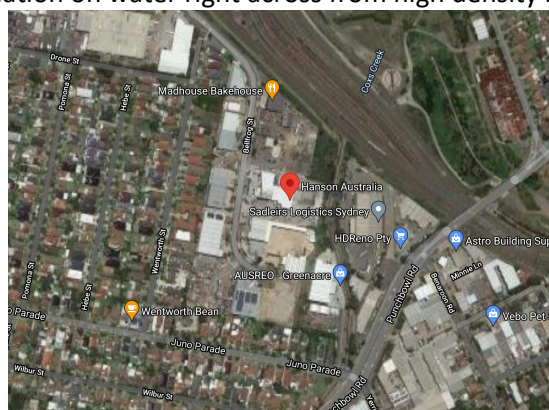
Most of these plans operate on restricted hours that are generally much shorter than standard business hours, no hours at night and never on the weekends or public holidays. All of these facilities are located in the middle of heavy industrial areas, buffered from adjoining residential not only by distance but by other industrial facilities – they are never right opposite residential uses and certainly not right opposite high-density areas such as Pyrmont, Balmain and Rozelle with only water separating them (which carries noise).

For instance –

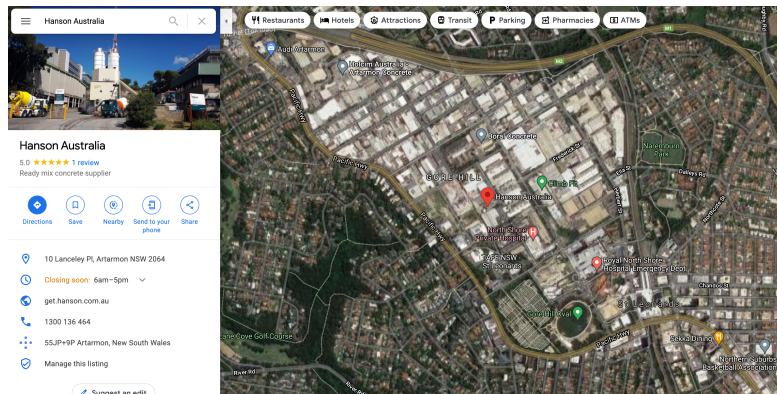
- The Strathfield plant operates from 9-5 on weekdays and 9-12 pm on Saturday but is closed on Sunday as well. The truck movement is away from residential, and the batching plant appears to be within a warehouse so the noise is buffered to the closes residential – this is a fragment industrial estate that would not meet current approaches to mixing heavy industry with residential uses.



- The Greenacre plant is open 9-5 weekdays but closed completely on weekends. This plant is also located deep within an industrial estate with residential buffered by other warehouse uses and is not situation on water right across from high density residential.



- The Artarmon plant operates from 6am to 5pm and 6-12pm on Saturday but does not operate at all on Sunday. It sits in a large industrial estate nowhere near residential uses and straight onto main road links which probably accounts for the more expansive hours.



However, the point here is not only the hours of operation. If the ships sit in the berths all night and for days on end the noise of their engines running constantly means that it is a 24/7 impact with no relief.

We have laminated glass in our window which is all the port will provide and we can clearly hear the ships on the odd occasion they use those berths. To be subject to that all year or with the sort of increased frequency that would occur, quite apart from operating hours of the plant, would be unbearable for all residents.

Infringements of noise limits by existing ships -

The Port Authority, which was the consent authority for the Multiuser facility has identified multiple instances of ships exceeding noise limits – with no obvious consequences, at both Glebe Island and White Bay berths.

The same agency prepared a shore power feasibility and emissions benefit study in May 2017. Although it identified noise reductions of 9-10 DB and significant pollutant reduction the Authority did not want to incur the cost of providing this. This is unconscionable given impacts to residents and if any such use as the Batching plant is to be contemplated ship to shore power MUST be provided for both the concrete plant and the multiuser facility as a deferred commencement condition and the approval should also be condition to stipulate only ships that can use ship to shore power should be allowed to use these berths. This must be monitored and enforced.

View impacts and visual appearance –

The photomontages identify a huge and unattractive facility. The major element is 85.4m in length and 34m high which runs parallel with the Anzac Bridge and would obliterate our (and others) view of the elegant pylon to the west. We can currently see both pylons together and the bridge deck. The Multiuser facility is lower than the bridge deck.

I also wonder about the urban park commentary that proposes a large park some 11 storeys in the air as part of the broader strategy. This is frankly ridiculous and would never happen due to the costs in spanning these industrial facilities which would limit support location and require enormously expensive structural elements – even bridging over rail lines has been shown to be prohibitively expensive.

So we seriously doubt this would ever happen and if it did a park 11 storeys in the air would serve no utility as it would be inaccessible and would do nothing to mitigate the noise impacts created by the ships and the noise at the berth edges.

Conclusions –

I strongly believe that the proposed plant is entirely incompatible near a densely populated inner-city area and sets an awful precedent where government can reap the financial rewards of intensification and then destroy the amenity and savings of the residents who have invested in these areas and trusted the government.

The noise it will generate through additional shipping and truck movements to service the plant as well as its operational noise, added to the existing noise levels in the area, unbuffered and with noise transferring over water, will be unbearable.

The noise will be constant which has even greater detrimental effects to humans as it is a constant noise source rather than intermittent and is unrelenting. This has grave effects on physical and mental health.

If the plant is approved which we fervently hope it isn't, please restrict its operation and the number of ships, frequency of ships and duration of stay severely to ensure peace at least at night and on weekends and public holidays ie restrict both ship noise, movement and plant operation to between 9-3 pm weekdays only.

Your Sincerely

Gavin Waldin