

14 August 2020

The Hon. Andrew Constance MP
Minister for Transport and Roads
GPO Box 5341
Sydney NSW 2001

Dear Minister

Glebe Island and White Bay Noise Policy

I ask that you make significant changes to the draft Glebe Island and White Bay Noise Policy to protect local communities before it is finalised.

The NSW Port Authority repeatedly promised to deliver a noise policy that would establish a fair balance between commercial activities at the port and local residents' right to the peaceful enjoyment of their home, including at night when they want to sleep. Unfortunately the draft policy is skewed towards the wants and needs of the shipping industry. It facilitates the expected noise conditions from the Multi-User Facility and Hanson Concrete Batch Plant rather than protect adjacent neighbourhood amenity. The result of this policy will be to render future complaints from residents to reduce impacts futile and negatively impact the liveability of an area that the government has slated for even further residential development.

Glebe Island is located within an environmentally sensitive area, with large numbers of people as close as 250 metres away from the port. Successive government policies have replaced Pyrmont's former industrial purposes with residential communities and further development has been earmarked across the peninsula, including at Blackwattle Bay. The working harbour at Glebe was scaled back to allow this residential development and any new port activities must work within the existing residential framework.

Statements that buildings at Jackson's Landing have been designed to cope with noise from the Anzac Bridge fail to acknowledge existing noise concerns about ships that currently use Glebe Island or the fact that these apartment buildings have been designed to have windows and doors open for ventilation, which is vital for amenity, especially in the summer.

Respite

Alarming, the noise policy fails to provide the local community with any mandated respite from noise.

Local communities have long called for a night time curfew on ship movements and loading and unloading. A curfew is a reasonable ask, particularly given the NSW Port Authority has assured me that all ships arriving will be from within Australia, which means their arrival time can be easily scheduled. It is also reasonable to require works to cease at night.

Ship movements and loading and unloading should be subject to a curfew.

In the absence of a night curfew, other forms of respite must be provided. With the approved Multi-User Facility and the proposed Hanson concrete batching plant expected to attract 400 ships each year, respite will only be possible if it is included in the conditions of the noise policy. Works on development sites are not permitted on Sundays and public holidays, and residents adjacent to Glebe Island must be given the same courtesy.

Without a curfew, ship movements and loading and unloading must be excluded on Sundays and public holidays.



Noise Limits

The proposed noise limits are inadequate. They are higher than the noise levels permitted under the NSW Port Authority existing environmental protection licence for use of the port at Glebe Island or any exceedance of that licence recorded. They are also higher than the levels set out in the noise policy for the White Bay Cruise Terminal, even though Glebe Island is closer to homes than the terminal. The noise limits exceed World Health Organization recommendations and world's best practice. It is unclear how these limits were established other than to ensure that they are high enough to exclude breaches.

Noise limits must be strengthened to protect residential amenity, particularly at night.

The scope of noise limits is confined to noise from ships that are already berthed, with noise caused by vessels entering and exiting the port excluded. This approach ignores the long history of concern from adjacent residents over ship movements at night causing sleep deprivation.

Robust noise limits on ship movements must be set.

Loopholes

The draft noise policy includes a number of exceptions and concessions from the application of the noise limits, including statements like: "where feasible and reasonable". The policy should not be open to interpretation or provide loopholes but rather be clear and provide all parties with guarantees.

Noise limits must be strengthened to be clear and definitive.

Penalties only kick in when vessels produce noise more than 5 decibels above the limits on four or more occasions. Under this model, ship bans will be rare and there will be little incentive for compliance. In contrast, the White Bay Cruise Terminal noise policy results in bans when a ship makes three breaches.

A stricter compliance model is needed in line with the White Bay Cruise Terminal noise policy.

Cumulative Impacts

The noise policy is unable to provide comfort to residents about emissions from Glebe Island because it does not cover all activities. The precinct will also accommodate development for the Western Harbour Tunnel and Rozelle Interchange, significantly adding to noise. A whole-of-region policy would be more appropriate and ensure residential amenity is protected.

There are large numbers of residents in this region and it is the government's responsibility to ensure development at Glebe Island does not impact on residents' health, wellbeing and amenity.

In line with the previous commitments of the NSW Government and the NSW Port Authority, could you please work with the local community to strengthen controls and inform me what action you take?

Yours sincerely



Alex Greenwich
Member for Sydney