

26 February 2018

The Hon. Melinda Pavey MP
Minister for Roads, Maritime and Freight
GPO Box 5341
SYDNEY NSW 2001

Dear Minister

Glebe Island – Multi-User Facility

I write to object to the proposed multi-user storage and distribution facility for bulk construction materials to be delivered by ship at Glebe Island. In its current form, the proposal represents a significant intensification of industrial activities with few restrictions within a precinct that has become largely residential. If unchanged, the proposed facility could have disastrous impacts on local communities.

There is general support for the inner city to retain some level of working harbour and recognition among surrounding communities that it will always have a presence in the region. However, this part of the harbour has changed significantly over the last two decades under successive state and local government urban renewal policies. The industrial purposes of Pyrmont have been replaced with residential communities and further development has been earmarked including on the current Sydney Fish Market site. The working harbour at Glebe Island has been significantly scaled back over the last decade allowing extensive residential development along the Pyrmont peninsula. Pyrmont is now Australia's most densely populated neighbourhood.

Glebe Island is now located within an environmentally sensitive area, with large numbers of people potentially affected by activities on the site. It is only 250 metres away from the high rise apartment buildings on Jones Bay and the proposed port must respond to this current setting, not the setting of a bygone era.

I am concerned that the Review of Environmental Factors (REF) fails to properly address this context and prevent serious impacts on existing and future Pyrmont residents.

Planning Process

Glebe Island sits within the Bays Precinct, which has been the subject of extensive work with stakeholders and residents for over a decade. The community has repeatedly been promised a holistic vision for the precinct that sets the future direction of development and land use, while protecting existing residential amenity. A strategic vision has not been set out, yet the state government continues to propose and approve new developments in an ad hoc nature. This piecemeal approach will not result in the best public outcome for the region. A master plan should be finalised for the precinct before any proposed development is approved, including the proposed multi-user facility.



Constituents in the buildings directly opposite the project have told me that they were not properly notified about the proposal and while the Port Authority has worked to address these concerns, including to provide additional information sessions, residents were told at these sessions that it is a “done deal”. How can residents have confidence in this process? Affected residents who attended these sessions say that they left the event when it became clear that there was no real consultation underway. As the state representative of residents directly affected, I was only notified about this proposal a week before submissions were due and found out about it from my constituents.

Of great concern is that the REF does not involve the same level of independent assessment and oversight that would be required under an environmental impact assessment process. Under the REF, the Port Authority assesses and approves its own proposal and there is no independent enforcement of controls. This inferior process is inappropriate for a major project likely to cause such significant impacts to so many people.

Reports include very complex and technical details that are difficult for lay people to understand. Without independent assessment of the reports and figures, residents are forced to accept the Port Authority’s claims that dust, pollution, noise and traffic impacts will be minimal. This is resulting in widespread distrust and strong opposition to the project.

Adding to this concern, the REF fails to impose limits and restrictions on operations to protect residents. The REF seems purposely flexible to ensure operations can expand unhindered.

This proposal must go through an independent, open and transparent assessment under a comprehensive environmental impact statement to the Department of Planning and Environment, with conditions of consent imposed to protect residents from noise, dust, pollution and light spill.

Impact assessments in the REF and claims that the proposal will cause minimal impacts use calculations in a REF approved in 2013. But this earlier REF did not include a community process and it is unclear to what extent current operations reflect what was approved in 2013. This means residents can’t compare the proposed facility with what happens now. Furthermore, the 2013 REF was for temporary storage, “anticipated” 30 shipping vessels per year for Berths 1 and 2, and did not include allowance for sand and aggregate to be handled at the facility. This provides a misleading picture of likely impacts.

24-Hour Operations

I strongly oppose the plan to allow the facility to operate 24 hours, seven days a week. This aspect is causing the greatest concern to the local community.

The proposed multi-user facility is a heavy industrial use that has the potential to create serious noise, air and light emissions. If not adequately restricted, these could have disastrous impacts on people’s enjoyment of their home, especially late at night.

The REF states that the worst case scenario for emissions would occur when ships are berthed at the port and are loading or unloading, yet there are neither restrictions on the number of ships that can berth at the port within a particular period nor any periods such as night or weekends when ships will not be permitted. There are also no restrictions on truck movements or any other activity proposed at the port at night or any other time. There are no absolute bans on berthed vessels running generators at night. This is completely inappropriate for a port within a densely populated area.

Claims that noise, air and light pollution will be minimal are not convincing given the nature of activities and the close proximity to Pyrmont residences. There is no information about how

emissions will increase from what currently occurs on the site with all comparisons being based on the 2013 approved REF.

When ships are currently berthed at Glebe Island, residents already report light, noise and air pollution in their homes including a constant hum from generators. There is no information to help residents understand the extent to which these impacts will increase, especially at night when they want to sleep and will be most affected. Some figures show exceedances in noise but there are also claims that they are below what would evoke a “strong community reaction”. “Strong community reaction” is an extreme case and below this level many people will be negatively affected.

It appears that the figures provided are based on homes keeping doors and windows closed at night because the statement that apartments have been designed to cope with noise from the Anzac Bridge appears repeatedly in the REF. But some buildings along Jones Bay are designed to have open windows and doors for ventilation, especially in the summer when it is windy and noise travels further and impacts will be greater. It is unacceptable that Pyrmont residents should have to keep windows and doors closed to prevent intrusive noise impacts.

Lights from vessels at night are a great concern with current operations already intrusive in the homes of Jones Bay residents. Residents are worried these impacts will escalate with the dramatic increase in the number of ships berthed at the port.

The flexibility in the REF appears would allow operators to continually expand in response to port demands without any limits at night or on weekends when residents should be able to enjoy peace and quiet at home.

Sydney Airport has a curfew to protect amenity at night for residents living under flight paths; the same protection should be awarded to residents adjacent to the working harbour.

Any approval should ban shipments and noisy operations where acoustic protections cannot be provided at night and on weekends. At a minimum, clear restrictions should be placed on night operations including bans on the use of ship lights, ship generators and reverse beeping, and the number of nights in a year that a ship is permitted to be berthed at the port, with schedules set to ensure respite for the adjacent community.

Noise

The intensification of industrial activities will increase noise pollution for people living on Jones Bay. Noise bouncing off apartment buildings will create echo effects that increase these impacts.

Promises to include noise management commitments in future contracts provide no guarantees for residents. Indeed the REF fails to place any real restrictions on operations to protect residents from noise. There are no restrictions on noise levels or time limits on continuous noise that would limit operations and there is no independent monitoring of noise. Instead the REF refers to what is “likely” and “expected” with the capacity to expand left unhindered.

Limits must be placed on noise operations to protect residential amenity. These limits must be independently monitored on a permanent basis, with penalties for breaches.

Air Quality

The impact of the proposal on air quality is a strong concern for residents of Jones Bay. They are concerned about ship emissions, and dust from bulk construction materials transferring to and from ships, trucks, conveyors and mobile stackers. Residents already suffer from strong odours from vessels using the port and cruise ships at the White Bay terminal. Sulphur emissions are of particular concern. Vessels can come from countries that may have few standards to reduce emissions.

The REF stops short at banning ships from running generators when they are berthed and there is concern that this is because some ships won't be able to connect to shore-to-ship power. The Port Authority's May 2017 White Bay Cruise Terminal Shore Power Feasibility, Costing and Emission Benefits Study concluded that the installation of shore power at White Bay Cruise Terminal was not a "cost effective solution". This gives the community little confidence about ships having access to alternatives to ship power.

Shore-to-ship power must be mandatory for expanded industrial activities and should also cover the existing White Bay Cruise Terminal.

All measures identified in the REF that "could" be introduced to reduce dust and pollution must form part of mandatory conditions of consent. There must be regular independent assessments of dust and pollution to ensure levels remain safe, regardless of whether residents raise concerns.

Traffic

While the proposal aims to take truck movements off the Sydney metropolitan road network, it will substantially increase truck movements between the site and the CBD, which are already highly congested, particularly in Pyrmont. The 2013 approved REF allows for 1,200 two-way truck movements per day and while the REF states that the multi-user facility is "not expected" to result in additional truck movements, it fails to apply any restrictions.

Furthermore, the claim that 1,200 truck movements per day would not create significant traffic problems in the inner city road network where traffic is often at a standstill is dubious and if more truck movements occur, the impacts could be significant. Residents already raise concerns about noisy trucks and compression brake noise.

Limits must be placed on truck movements with measures put in place to ensure that every possible effort is made to reduce movements below the limits. Trucks must also be banned from rat-running in local streets.

Public Waterway

The project site is adjacent to bays that are heavily used for passive boating, especially along Bank Street in Pyrmont. There is no evidence that the Port Authority has consulted with passive boating organisations to ensure that the additional number and large size of ships accessing Glebe Island will not impact on passive boating safety or access to the harbour.

Passive boating activities have launched from this part of the harbour for over a century and new developments must not interfere with this important recreational activity.

Construction

If the project is given approval, it will take around nine months to construct. I support limits that restrict construction activities to standard construction hours, including the arrival and departure of trucks, which will give residents respite in the evening and on Sundays and public holidays. Measures identified in the REF that would be introduced to mitigate impacts "where it is reasonable and feasible" should form part of mandatory conditions of consent, such as providing turning circles to prevent the need for trucks reverse beeping, and requiring operators to turn off plants when not in use.

There are large numbers of residents in this region and it is the government's responsibility to ensure development in the area does not impact on their health and wellbeing. ***Protecting residential amenity should be a priority of this project.***

Could you please delay this project until a master plan for the Bays Precinct is established, refer any proposal to increase working harbour activities at Glebe Island to the Department of Planning and Environment through an environmental impact statement and introduce appropriate controls for the port including bans on night time and weekend operations?

Yours sincerely

A handwritten signature in black ink, appearing to be 'AG', written in a cursive style.

Alex Greenwich

Member for Sydney

Copy to: Port Authority of NSW