From: **Jennifer Owen** <jenniferowen.jo@gmail.com>
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Subject: Public Submission - Glebe Island concrete batching plant
To: <ipcn@ipcn.nsw.gov.au>

The Commissioner

Office of the Independent Planning Commission NSW

Level 3, 201 Elizabeth Street Sydney NSW 2000

Dear Sir/Madam.

I am responding to the invitation to submit additional information to the IPC enquiry into the Hanson application to build a batching plant on Glebe Island.  Specifically, my submission relates to the Letter from the Applicant to the Commission, dated 24 May 2021 (including the Applicant’s amended Site Plan, NS Elevations and EW Elevations).

In the Letter, the following statements are made:

*“Either way, the importation of aggregates via ship to Glebe Island will result in an improvement to the efficiency and sustainability of Hanson’s concrete supply chain and would reduce truck movements across the inter-city and Sydney metropolitan road networks.”,*and…

*“Hanson attempted to have Condition F3 (a) amended by DPIE to clearly state that the 1,000,000 tonnes of aggregates delivered per annum is by ship only, but DPIE had already referred the project onto the IPC. Hanson would like this conditioned amended, so it clearly states that the 1,000,000 tonnes per annum is delivered by ship.*

*The ship capacity is anticipated to be within 4,000 tonnes (2,500 m3 ) and 13,000 tonnes (8,125 m3 ) depending on what is available in the shipping market at the time. Hanson is yet to determine to appropriate vessel for the facility. The approximate aggregate truck capacity delivering and receiving aggregates from the site will be 33 tonnes (20.6 m3 ).”*

Using Hanson’s numbers, this implies that Glebe Island will host between 250 ships (of 4,000 tonnes) to 76 ships (of 13,000 tonnes) per annum by Hanson alone.  Added to this must be other shipping activity that may also occur at Glebe Island.  The issue is that Glebe Island port is not appropriately built to accommodate that many ship movements so close to such a residential area where thousands of people now live.

As Hanson points out, they expect “efficiencies” from the use of ships to deliver aggregate to the proposed facility, but this efficiency is at a huge cost to the community. No requirement to establish appropriate port infrastructure, including at a minimum, ship-to-shore power to avoid generators running 24/7 and affecting all the people who live within meters of the port and the facility being affected is being required of Hanson.  However, their profits will be boosted by the co-location of the proposed multi-user facility at Glebe Island and their concrete batching facility. Both projects go hand-in-hand.

The noise, light and air quality impacts of ships at Glebe Island have been a constant problem for years, and the Port Authority has done little to address community concerns.  I attach correspondence over the years with the Port Authority and the EPA to demonstrate the Port Authority's ongoing insistence that Glebe Island is and always has been a “working port”, but their failure to comply with the standards set by the EPA on noise emissions.  These provide proof that the operators of the Port, and users, will not make any meaningful attempt to comply with any conditions placed upon the port and other industrial activity associated with it, including the proposed batching plant. I also attach a table, prepared in 2018, and referred to in my correspondence, or the regular breaches of noise limits at Glebe Island. I note that even this year, breaches still continue. I do not have time to update the table, but attach several recent noise monitoring reports which indicate breaches of the noise limits as recently as March and April this year. I would also note, fining operators of noisy ships does nothing to address the longer term problem nor to improve the living conditions of the thousands of residents who now face the Glebe lsland port.

In fact, external consultant, SLR, in a report dated 14th May 2019, to Hanson, (link: <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-808%2120200131T012303.768%20GMT>) concludes that the predicted level of noise of the combined operations of Predicted Cumulative GIB1, Facility, GIB2 and Multi-user Facility Amenity Noise (dBA re 20 µPa) *“At Pyrmont, the cumulative amenity noise levels are below the daytime Precinct amenity noise level of 65 LAeq(11hour). Further at Pyrmont, cumulative amenity noise levels may exceed the Precinct amenity level of 55 LAeq(4hour) by up to 3 dBA during the evening, and during the night-time may exceed the Precinct amenity level of 50 LAeq(9hour) by up to 8 dBA.”*8Dba at night time is a significant exceedance. I am not a sound engineer, but my understanding that increases in decibels are not linear but escalate dramatically the further the limit is breached.

Regardless of the Port Authority’s posturing, it does not require an expert to conclude that port of Glebe Island has not operated as a “working port” for many years.  This is as a result of the NSW Government’s sale of land and permitted development of Jacksons Landing, which now houses thousands of residents.  The situational considerations of what is appropriate at Glebe Island have clearly changed, as a result of the government’s actions, given the significant increase in residential housing with meters of the port.  If a “working port” is to be re-established, appropriate infrastructure needs to be built,  at the cost of Port Authority or the users of the Port, in order to operate within safe standards for noise, light and air pollution, given its residential location.

Ship emissions are an even greater issue given the emergence of the CV-19 pandemic and the disastrous performance of the shipping industry in operating safely when faced with global pandemics.  The establishment of appropriate bio-security facilities and procedures for Hanson (and other) ships, their contents, and the people on board have also not been outlined or required.  Allowing foreign ships and their crew into the middle of Sydney harbour on an almost daily basis, and the level of interaction and activity which is proposed, places the whole of the city at risk. The Covid pandemic has demonstrated that ships are diabolically effective vessels for the transmission of disease. If Hanson is to operate this shipping facility, appropriate bio-security facilities and protocols also need to be established, given the location of the port and the proximity of Sydney residents.

In summary,

1.       The expanded port (the Multi User Facility (MUF)) is clearly integral to the Hanson proposal and must be considered as part of the development application.  The activity proposed by Hanson is inconsistent with the pre-existence of thousands of residents whose health, safety and quality of life will be negatively affected by the operation of the plant and the MUF.

2.       In return for the efficiencies gained from shipping aggregate to the proposed plant, Hanson needs to be required to invest in the appropriate port infrastructure, including ship-to-shore power and biosecurity facilities, to protect the community from the increased noise, light, biohazards and air pollution that the operation of their batching plant will result in, given their reliance on shipping to bring aggregate to the proposed batching plant.

3.       The Port Authority cannot be trusted to impose adequate constraints on the operation of a MUF at Glebe Island to service the Hanson plant, and to impel Hansen's and others ships to be compliant with constraints. The EPA has also been very ineffective and enforcing compliance. Corporations who have demonstrated a disregard for regulatory requirements should not be rewarded with an expanded operational remit. They simply can’t be trusted.

Yours sincerely

Jennifer Owen,

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