

Glebe Island Silos Throughput Capacity Increase

Application No DA-188611

Jacksons Landing Coalition Inc. - OBJECTION

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The Jacksons Landing Coalition Inc. strongly objects to the proposed development.

General observations

The adverse environmental impact

The Cement Australia (CA) proposal is the third proposal in the last couple of years that would involve a major expansion of industrial activity on Glebe Island. It follows the NSW Port Authority's Multi-User Facility (MUF) and Hanson's Concrete Batching Plant and Aggregate Handling Facility (CBP).

The great mystery for local communities is why the state government, and the Department of Planning, Industry and Environment (DPIE) in particular, would support such a massive exercise in reindustrialisation in the heart of Sydney on the foreshore of the city's beautiful harbour.

The three proposed developments would dramatically increase the handling and processing of bulk materials on Glebe Island and the level of water and road traffic in the surrounding area. It is self-evident that this explosion of activity would have significant detrimental consequences for the environment in terms of air and noise pollution and traffic congestion. For example, the three projects would add 230 additional bulk carriers each year. That's 460 extra bulk carrier berthings and departures (with associated tugs), and 460 extra trips into and out of Sydney harbour.

The proponents of these developments assert that there will be no adverse environmental impact. That self-serving nonsense is justified on the basis of turgid technical reports prepared by consultants paid by the proponents. It defies any kind of logic given the scale of the developments and certainly would not pass the 'pub test'. Perhaps most tellingly, residents surrounding Glebe Island know from their lived experience that many of the assertions made about the benign impact of these developments are disingenuous and incorrect.

The cumulative impact

It is very troubling that neither the DPIE nor the Port Authority (PA) has properly considered the cumulative impact of the MUF, the CBP, and the CA throughput capacity increase.

CA addresses one partial element, namely the cumulative impact of its proposal and the CBP, but only in one specific context – the Landside Precinct noise level. It might be argued that CA can only be expected to analyse the implications of its own proposal given its lack of knowledge as whether, and to what extent, other proposals will proceed. That just highlights how the responsibility for undertaking a comprehensive and independent assessment of the cumulative impact must lie with the DPIE.

Our experience has taught us that the PA certainly cannot be relied on to protect the public interest by considering cumulative impact. It is hopelessly conflicted and only seeks to maximise its own position.

That may make sense for the PA, but why is the DPIE so compliant with the PA's wishes? Why isn't the DPIE more focused on the wider issue of what's best for the city of Sydney? Imagine Sydney today if the PA still controlled Barangaroo and ran it as a port.

Consistent with the ideas that drove Barangaroo, the state should be looking to reduce dirty industrial activity in the center of Sydney, not increase it.

The specious arguments proffered to support expansion of Glebe Island activities

Two arguments are always run by the proponents of these developments. The first is that Glebe Island has been a port for more than a century and what is proposed is just 'business as usual'. This is a specious argument. Times change. Over the decades, many industrial activities have been moved out of the inner city and replaced with residential, retail, and office precincts. Barangaroo is a classic example. This is a trend evident in advanced global cities around the world.

Over the last twenty years, there has been a huge increase in residential occupation around Glebe Island, the Jacksons Landing development of 1,400 apartments being the most obvious example. Residential occupation will continue to expand in Balmain, Rozelle, and Annandale in the years ahead. The state government's own Bays West initiatives, including the rejuvenation of the White Bay Power Station and the construction of the Bays West Metro Station, are presumably designed to encourage this trend.

Why is the state going down the path of rejuvenating and rehabilitating the Bays West area while at the same time facilitating polluting developments on Glebe Island that would sabotage that task? Increased industrial activity on Glebe Island, with all the associated congestion and air and noise pollution, will seriously negate the attractiveness of the area as a destination, thereby undermining the commercial viability of the metro station and other improvements.

Has the state done a proper cost/benefit analysis of more than doubling CA's throughput? Would the PA's extra revenue from CA outweigh the adverse financial impact on the Bays West precinct of having another 30 ugly bulk carriers producing air and noise pollution in the area as they come and go and unload their noxious cargo?

Page 52 of CA's Environmental Impact Statement (EIS) states that "the industrial nature of the site is in keeping with the existing surrounding land uses and the operation of the Port in the immediate and short-medium term". This is disingenuous. CA's activities are clearly not "in keeping" with a new metro station, a rehabilitated White Bay Power station, and the other plans for the transformation of Bays West.

Even if you disregard the transformation of Bays West and the general expansion of residential occupation around Glebe Island, the argument that the recent proposals at the port are just business as usual does not stack up. What is currently proposed on Glebe Island

is a major ratcheting up of industrial activity not business as usual. In the case of CA's proposal, there would be an increase of 140%.

The second specious argument proffered for the latest developments is that they will take trucks off Sydney roads and reduce pollution. Hanson ran that argument in relation to its CBP but it didn't stand up to the scrutiny of the Independent Planning Commission (IPC). The IPC recognised that much of the material Hanson was proposing to bring into its facility was destined to be trucked straight back out again to other Hanson plants across Sydney, thereby negating many of the claims made about reducing truck usage.

CA's proposal is similarly flawed. By CA's own admission, only half the cement currently brought in through Glebe Island is used "in central Sydney near to Glebe Island". The other half is distributed to destinations across Sydney that would be better serviced from elsewhere. As discussed in more detail below, the location argument does not support any expansion of CA's Glebe Island throughput.

Specific comments

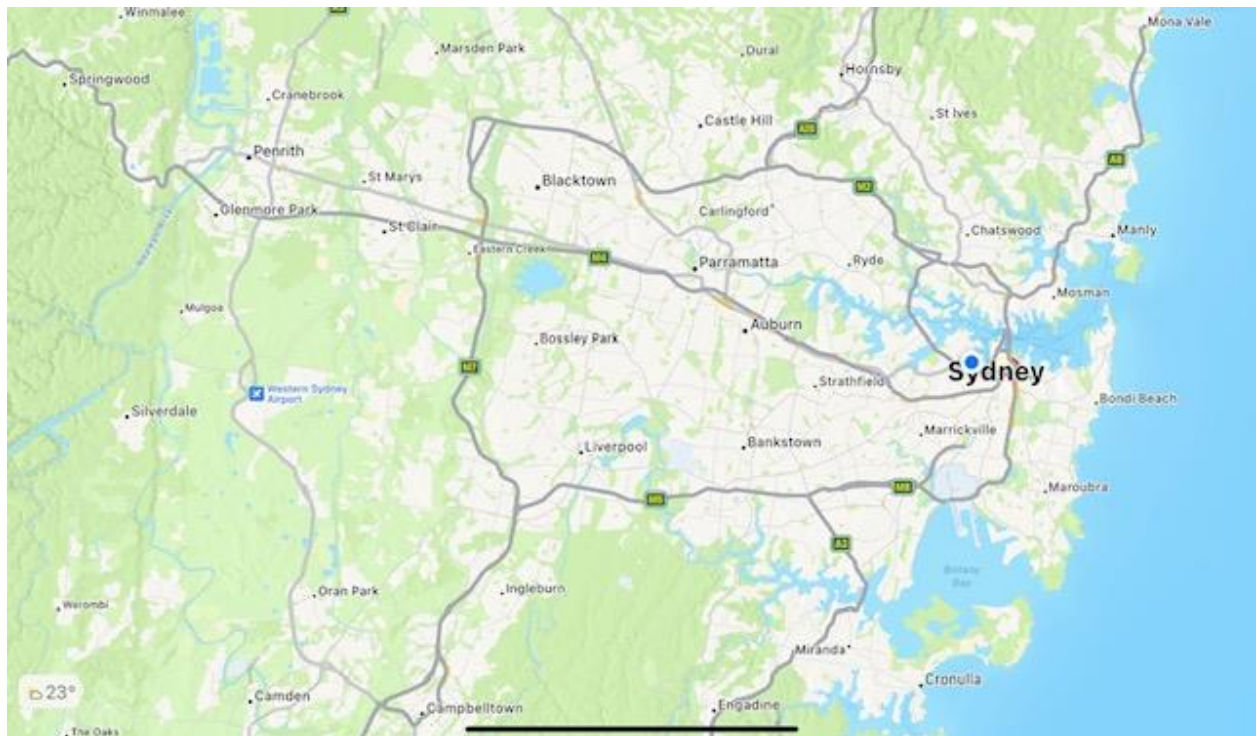
Justification

CA's latest proposal relies on the argument that there is increasing demand for cement in Sydney which can only be satisfied by bringing that cement through Glebe Island. According to the EIS, bringing the cement through CA's other facilities in Port Kembla and Kooragang is not an option for two reasons. The first reason is that it would "increase time and travel costs for the transport of this material to Greater Sydney". In other words, it would not suit CA's profit margins. That is not a reason to increase pollution and traffic congestion in the heart of Sydney.

The second reason given is that bringing cement through Port Kembla and Kooragang rather than Glebe Island would "increase transport emissions". That may well be the case, but it is not a valid justification for expanding CA's Glebe Island facility. Just because Port Kembla and Kooragang don't work does not mean that Glebe Island is the only alternative. Central Sydney should not have to put up with a massive expansion of pollution and congestion around Glebe Island just because CA does not have any other convenient facilities.

CA is a commercial organisation. If its other existing facilities are too far away, it should develop a new one at a more suitable site. The obvious one is Port Botany. That may require additional investment by CA but that is not Sydney's problem.

The EIS refers to the need for cement in places like the Western Sydney Aerotropolis. It would be absurd if cement for locations like that were brought through the heart of Sydney. That is obvious from even a cursory look at the map of greater Sydney below.



The map shows that, in the context of greater Sydney, Glebe Island and Port Botany are relatively close to each other. In terms of trucking cement to western and southern Sydney, Glebe Island is no closer than Port Botany. Sourcing cement from Glebe Island would provide no emissions reductions compared to sourcing it from Port Botany. It would be crazy to supply cement to places like the Western Sydney Aerotropolis or to Parramatta from Glebe Island. That would do nothing to reduce emissions, but it would significantly increase pollution and traffic congestion in the central city.

Page 24 of the EIS admits that only half the cement that currently passes through Glebe Island is used in “central Sydney near to Glebe Island”. That equates to about 250,000 tonne per annum. CA’s Glebe Island facility already has approval to handle 500,000 tonne per annum. Accordingly, the facility has the capacity to cope with a *doubling* in the demand for cement in central Sydney.

This means that the expansion of throughput capacity being sought by CA is for cement that would not be used in central Sydney. Instead it is for cement that would be brought into the beautiful Sydney harbour by ugly bulk carriers causing visual, air, and noise pollution and then distributed back out across Sydney by trucks causing pollution and congestion in inner Sydney.

The DPIE should not contemplate such an arrangement when a far more attractive alternative is available. The state owns the PA which operates Port Botany. Therefore, the state can facilitate the development of a new CA facility there.

Noise

As with all the recent developments proposed for Glebe Island, the applicant has presented numerous self-serving documents prepared by its consultants on the key technical issues. With limited resources and a very limited time frame to consider these documents, it is impossible for local communities to provide comprehensive submissions. At the end of the day, the way the system should work is that Sydney residents should be able to rely on the DPIE to protect the public interest and to properly vet the CA application.

Given the various constraints, we have focused on just one of the technical issues, namely noise. The major shortcomings of the CA application on that issue identified below are no doubt indicative of major shortcomings across all issues. We look to the DPIE to identify those.

Excessive noise causes both health problems and material impairment of lifestyle for local residents. Sleep disturbance from noise generated at Glebe Island is already a big problem in surrounding areas. It arises from three sources - vessels berthing and departing at night, unloading operations, and vessel generators. That existing problem should not be exacerbated by any expansion of activity on Glebe Island such as the latest CA proposal.

The Noise Impact Assessment (NIA) prepared for CA is the usual advocacy document. It asserts that there will be no problems because "the proposed throughput increase by CA will not change the noise emissions levels from vessels". That ignores the fact that the existing noise emissions levels are disturbing and distressing for many local residents. The proposed throughput increase would more than double that disturbance and distress. 30 more vessels. From 50 days/nights per year to 110 days/nights per year.

There is no analysis of the noise impact of the resulting additional vessel movements. These vessels travel in through Sydney harbour, under the Sydney Harbour Bridge, past Balmain and Pyrmont, and down White Bay. At night, these journeys disturb the sleep of many of the residents they pass. The noise of tugs guiding the vessels is particularly sleep disturbing. As noted on page 44 of the EIS, "The ships proposed to be used by Cement Australia for the expanded facility are up to 170 metres long, and would use Johnstone Bay to swing around". There is no recognition of the major noise problem that this represents at night for residents of Jacksons Landing.

The NIA is also silent on the cumulative impact of CA's proposal. The 30 extra vessels for CA would be added to the 200 extra vessels for the MUF and the CBP. It is both frustrating and infuriating that this rising threat to thousands of people continues to be ignored.

Perhaps the greatest flaw in the NIA is its reliance on the PA's discredited Port Noise Policy (PNP). The NIA states that "the noise impact associated with proposed throughput increase ... is assessed in accordance with [the PNP]".

We have previously written at length about the PNP. It has been crafted by the PA solely for the purpose of protecting its own business activities. It does that by ensuring that PA customers and potential customers will never be troubled by any meaningful noise restrictions. It is in effect a cynical marketing document prepared by the PA to facilitate the

expansion of Glebe Island, and it does absolutely nothing to protect local communities from noise pollution.

We continue to be amazed at, and disturbed by, the glowing way in which the PNP is described in places like the CA application and the Pyrmont Peninsula Place Strategy. It is written about as though it were a tough public protection measure that imposes severe restrictions on the generation of noise in the port. Nothing could be further from the truth. Anyone who is familiar with the facts must recognise that it is just an exercise in spin. There are no meaningful noise limits, and the enforcement mechanisms are feeble.

The inadequacy of the PNP was revealed by the recent decision of the IPC regarding the Hanson CBP. Hanson sought to rely on the PNP to minimise its own noise mitigation measures. The IPC saw the PNP's shortcomings. Accordingly, it imposed lower noise limits on Hanson than those applying in the PNP, and it imposed a curfew on vessel movements and unloading from 10pm to 6am to provide "night-time respite" for local residents. (In spite of many submissions calling for curfews to be included in the PNP, the PA has always ignored the issue.)

Self-evidently, if the IPC, a group of *independent* experts, saw fit to impose lower noise limits and a curfew on Hanson's CBP, the same restrictions should apply to CA's proposal if its application is successful. To allow CA to cause noise pollution that was expressly ruled unacceptable by the IPC should be inconceivable.

Perhaps the greatest of the PNP's many flaws is that it does nothing to address the most significant noise problem with vessels, namely tonality, intermittency, and low frequency. The generators on vessels are a major source of these types of noise – throbbing, vibration, reverberation etc. These are the biggest causes of sleep disturbance. An additional 30 CA vessels would more than double the sleep disturbance from this source.

It is an indictment of the CA's current activities that they do not even comply with the highly permissive PNP. CA says that it hopes to achieve compliance with the PNP "in the long-term". In the meantime, it wants to increase its already non-complying activities by 140%.

CA offers no mitigation of the problematic noise it produces. Page 19 of the NIA states that "CA has limited control over the noise emissions from vessels". Surely the DPIE does not accept such a nonsensical statement. The coming of vessels to CA's facility is completely under the control of CA. If a vessel is too noisy, it is up to CA to say to the vessel operator that if it wants CA's business, then it needs to provide quieter vessels. If there is a problem with an aspect of CA's business, then CA is responsible for fixing it. It cannot possibly be acceptable for CA to simply shrug its shoulders and expect the public to assume the problem.

[Shore to Ship Power](#)

Unsurprisingly, the EIS is completely silent on the use of shore-to-ship power at CA's Glebe Island facility. The recent public announcement of the NSWPA's planned use of shore to ship power is a welcome development however as a minimum, there should be a reasonable time frame for CA to move to this source of power.

Crane and Bucket Unloading

The final issue for consideration is the use of 'crane and bucket' unloading. The rasping and grating noises made by this unloading mechanism is particularly jarring and sleep disturbing. In the context of the PA's MUF proposal, the NSW Environmental Protection Authority proposed restrictions on vessel unloading mechanisms to minimise noise pollution. It specifically referred to precluding the use of crane and bucket operations. This was accepted by the PA in its Response to Submissions. Page 13 of that document states that "crane and bucket unloading methods would not be used" at the MUF. It follows that crane and bucket unloading should not be used by CA at Glebe Island.

Expiration date

CA proposes that no duration be set for the proposed throughput increase. This is on the basis that CA is a tenant of the PA which can control the position. According to page 21 of the EIS, "placing an expiration date on any development consent associated with this application is not necessary in this instance".

Given our complete lack of confidence in the PA, we strongly object to CA's suggestion. The PA has a major commercial conflict and, in our view, its actions to date in relation to the MUF and the CBP indicate that it cannot be relied on to consider the public interest. In any event, Sydney should be looking to close down all CA's Glebe Island operations within 12 years.

Conclusion

For the reasons identified above, we submit that CA's application to increase its throughput capacity at Glebe Island should be rejected. It should develop a new facility at Port Botany or make other more appropriate arrangements. In 2022, we should not be increasing traffic congestion and air and noise pollution in the heart of Sydney.

In the event that CA's application is successful, we submit that, *as a minimum*, the following conditions should be imposed.

- A curfew on vessel movements between 10pm and 6am.
- The same noise limits as those imposed by the IPC on the Hanson CBP.
- A prohibition on crane and bucket unloading.
- A requirement for shore-to-ship power within five years.
- An expiration on the approval of 12 years.

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