

White Bay Stratas Committee

PO Box 197
Rozelle NSW 2039

Department of Planning and Environment
4 Parramatta Square
12 Darcy Street
Parramatta
NSW 2150

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Glebe Island Silos Throughput Capacity Increase Application No DA-188611 – Lot 12 Sommerville Road, Rozelle

The White Bay Stratas Committee (WBSC) represents some 2000 Lot Owners and Residents of the four strata schemes adjacent to the White Bay & Glebe Island. Our Committee has been a major contributor to the overall planning of the Bays Precinct. Based on our contribution, Committee Member Professor Jane Marceau (now deceased) was the only Community Member invited onto the Bays Precinct Taskforce by the Baird Government. We are well acquainted with the enormity of planning that has already taken place with these lands owned by the people of NSW.

We strongly object to the above application for the following reasons:-

- **Re-Industrialisation of Sydney Harbour**
- **Cement Australia's DA represents close to a 150% expansion of polluting materials. This would be a huge environmental impact on the local community.**
- **Cumulative Environment Impact of incremental developments**
- **This proposed expansion is an exceptionally 'poor' use of one of our most valuable lands owned by the people of NSW.**

Re-Industrialisation of Sydney Harbour

The increase in cement capacity at the silos would result in many more merchant vessels using Sydney Harbour for the delivery of goods to be trucked elsewhere, thereby adding to the noise and air pollution that is centred on the community surrounding the port. As each individual DA is approved so the pollution increases, and the living standards decrease for residents in surrounding suburbs.

It begs the question:

Where is the data to justify the re-industrialisation of the harbour?

While many international cities are centralising port activities away from city centres the NSW Government is still accepting this type of DA for Sydney Harbour with no explanation of the reasoning behind it.

Future expansion is in Western Sydney and it would be much better served from Port Botany with its state-of-the-art infrastructure designed to keep goods moving. Bringing goods into the centre of a city only to truck them out again is nonsensical. It's the responsibility of State Government and the Department of Planning & Environment (DPE) to ensure NSW is properly served to the benefit of all.

Cement Australia already has approval at the silos for 500,000 tonne capacity per annum and, by their own admission, only half of the cement that currently passes through Glebe Island is used in central Sydney near to Glebe Island. The rest is trucked elsewhere. Therefore, CA already has the capacity to deal with a doubling of demand for cement in central Sydney. The logical conclusion is that the additional capacity requested in the DA is to be trucked across Sydney, away from the centre, not only polluting the environment but also congesting our roads.

It is absurd to keep supporting this type of activity in Sydney Harbour when there is a fully functioning port in Botany. The Port Authority's attempt to maintain a presence on the harbour would be farcical if it didn't affect the lives of so many. The difference in air quality between Glebe Island/White Bay and other parts of Sydney is considerable. It's not unusual for residents to regularly remove greasy sooty particles deposited on balconies and outdoor living areas. The noise experienced at different times of night and day would be unacceptable in any other residential area.

In the past, developments in Sydney like Westconnex and Bays West have been used to justify port facilities in the harbour. Bays West will not be developed all in one go and, even if it is, it isn't big enough to warrant its own port. Neither is Westconnex. There is no construction requirement that big in Sydney.

To protect their occupancy on the harbour, it appears the Port Authority is deliberately attracting cement, sand etc. in order to build "a cluster of uses in circular economy" as described to them by a member of the IPC during the Hanson's Cement Batching assessment (See Transcript pages 19 & 20). The question is:

Where is the evidence to support this? ie the *independent* studies, the data, that conclude a port operation on Sydney Harbour is of benefit to the citizens of NSW?

Leasing Arrangements

Dating back to 2005, considerable work has been undertaken by the Government and Community Groups (including ourselves as a major contributor) on the Bays Precinct. **This proposal is in direct conflict to those efforts and the many \$millions already invested by**

the government in the future of these lands. These are lands owned by the people. They are very valuable lands. This use is recognized as being the lowest valued use possible. There is so much better to offer the people of NSW. Until the future of the port is known, there should be no leases longer than 12 years and that applies to the Cement Australia DA.

Environmental Impact

Pollution

Expanding from a 500,000 capacity to a 1,200,000 capacity, represents an increase of almost 150% of polluting materials and exposure to noise of offloading to local residents and a significant increase in truck movements throughout the State. **This type of increase would not be allowed in any western society.** Given the amount of supporting documentation to read and the time allowed for public scrutiny, we have concentrated on our main concerns which relate to noise:

Those we represent often struggle with noise emissions from current operations. This application seeks a huge increase in the current volumes of ship visits per annum and will mean less and less precious reprieve from noise for residents.

Unloading ships is a 24-hour operation over several days and often interferes unreasonably with the comfort and repose of those living in nearby premises. The closest homes are less than 230m away from these vessels with very little other than water and open space between them.

In the past, White Bay was used as a container terminal. With the exception of 'perishable goods', offloading during the night was prohibited. This should be the same with offloading cement. **There needs to be a curfew on offloading cement between 10 pm to 6 am.**

The current noise protections offered by the EPA's *Noise Policy for Industry* and the *Glebe Island/White Bay Noise Management Policy* including the automated noise monitoring stations have technical limitations in the type of noise they record. They are set to identify tonal noise based on 1/3 octave frequency bands. Our experience of noise emissions from the cement ships visiting Glebe Island has demonstrated the regular occurrence of disturbing tones not identified in the 1/3 octave band resulting in ship operations deemed to be compliant despite their disturbing noise emissions.

The EPA's *Noise Policy for Industry* acknowledges that in some circumstances tones may not be identified using the 1/3 octave band method and narrow band analysis may be required. However, the automated noise monitoring systems used in White Bay and Glebe Island do not actually record narrow bands, so the disturbances are not measured and more importantly not reported by the monitoring systems. **This results in a flawed and false determination of noise compliance by vessel operations.**

Residents live less than 230m away from where these ships are berthed at Glebe Island. It is not fair nor just to expose residents to a greater number of days each year where they are

forced to suffer these noise disturbances. We have several port alternatives such as Port Botany and Port Kembla with facilities that are not in such close proximity to long established residential homes. The additional capacity to satisfy Sydney's demand for this product should be channeled through these alternative port facilities.

Cumulative Effect of Incremental Development

The planning approvals system does not deal well with incremental increases and cumulative impacts of individual approvals.

Many of our past submissions have requested that the cumulative impact of adding a new development to existing operations be measured and assessed before approval is given but the cumulative effect of adding the proposed increase in cement delivery has been ignored.

Every additional development brings increased traffic with its associated pollution together with pollution from the operation itself. And every time the cumulative impact is ignored by the DPIE.

The DPE website states:

"We're delivering a liveable, workable and beautiful NSW" through various programmes and initiatives.

By rejecting this proposal, this is the DPE's opportunity to show the people of NSW they are living up to that statement.

Currently, Glebe Island & White Bay port is hosting a Metro station/support site and a Westconnex support site whilst running a few port activities. In plan, is the Multi-User Facility (given planning permission with no tenant to fill it), Hanson Cement Batching Facility (with conditions on noise and restrictions on truck movements) and the Western Harbour Tunnel fabrication and support site. Not once has the cumulative effect of this incremental development been measured by our representatives, the Department of Planning & Environment.

Painstakingly considered development approvals granted in the past, should not be undermined by subsequent applications for expansion. Doing so challenges the integrity of the DA process and brings the whole process into community disrepute.

There has to be an end to their reliance on EIA assessments provided by the proponent. Instead, the DPE must represent the community by obtaining independent environmental assessments that include the cumulative effect of adding each newly proposed development. A DA applicant would not be in a position to assess the environmental impact of operations outside their responsibility. Only the DPE can do it.

Conclusion

1. There is no justification to expand a polluting operation by almost 150%.
2. There is no justification to reindustrialise Sydney Harbour when there are other ports available for low economic uses.
3. The proposed expansion conflicts with the works undertaken for the future development of this area by the Bays Precinct Taskforce.
4. The process of monitoring the cumulative effects of port noise is flawed.

If the Port Authority wishes to continue operating in what is now a significantly populated residential area on Sydney Harbour then the following must apply:

- *The Glebe Island/White Bay Noise Management Policy* together with the noise monitoring stations be updated to manage and record narrow bands as well as those already recorded.
- The DPE planning approvals process be updated to include the measurement and assessment of the *cumulative* environmental impact of each DA.

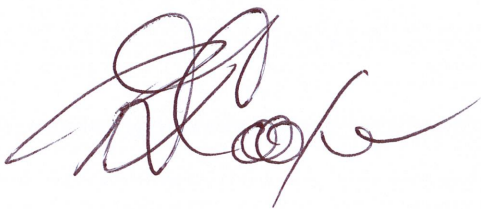
If the Cement Australia (CA) DA is approved there must be:

- A curfew on vessel movements between 10pm and 6am
- The same noise limits as those imposed by the IPC on Hanson CBP for all developments
- A prohibition on crane and bucket unloading
- A 12-year limit on the length of leases

If similar DAs to that submitted by CA are allowed to continue then we expect to see:

- Data to justify the re-industrialisation of Sydney Harbour
- An *independent* study evaluating the benefit of Glebe Island/White Bay port operations to the citizens of NSW.

We trust our concerns will be taken into consideration and the DA submitted by Cement Australia to increase capacity at Glebe Island/White Bay is rejected.



Paul Cooper
Chairman – White Bay Stratas Committee
Email: paul.cooper@coopersagency.com
Mobile: 0410 510248