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THE GLEBE SOCIETY INC.

PO BOX 100, GLEBE NSW 2037 AUSTRALIA

Conserving our heritage ... Encouraging a sense of community ... Working for Glebe's future

Submission related to: Application Number MPO6_0210

Dry Boat Storage and Marine Facility on Rozelle Bay
Part lots 2, 3, and 4 DP873379, James Craig Road, Rozelle Bay

Submission to:

Planning and Assessment Manager
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Date of Submission: 18th October, 2006

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Introduction

The Glebe Society Incorporated wishes to express its strenuous opposition to this proposal which will impact negatively on the amenity of the local area: on the amenity of residents through noise at both the construction and mature stages; on the amenity of park and foreshore walkway users through that same noise; and on the amenity of traditional users of the bay through having the majority of their rowing/paddling course taken from them and through the wash that the hundreds of daily boat movements will inevitably create. In addition it will impact negatively on the quality of the bay itself – its water, its marine animal and plant life, and on the growth of wetlands including mangroves which serve as a first stage in a long-overdue attempt to improve the ecology of the bay.

The proposed development is a massive project by any standards, and one that would overwhelm this tiny bay if allowed to proceed. The land-based developments are entirely out of scale with the existing developments adjacent to this site and indeed with anything in the local area. It would dominate the horizon when viewing from Glebe Point Road or the park and walkway. It produces a much-maligned walled-effect along the bay and obstructs views whether viewing to or from the bay. Its visual impact when seen from any location will be all-dominating. In short it is an architectural monstrosity!

The water-based development is also entirely out of scale with the bay. Rozelle Bay is 211 metres from Glebe Point to the northern shore. The longest arm of the marina protrudes 64 metres into the bay at this narrow point. All boats leaving the marina need to clear this arm. With several boats up to 12 metres in length leaving the marina together in peak times, there would no doubt be several abreast rounding this longest arm, then the superyacht marina, NSW Maritime and finally the proposed slipway at the Anzac Bridge. Little of the bay will be available for the safe use of rowing skiffs, dragon boats, canoes and kayaks.

Rozelle Bay is small, land-locked, non-flushing, contaminated with toxic sediments and suffering from the loss of its marine animal and plant life through earlier ignorant industrial vandalism, and more recently through neglect and a failure to institute remedial measures. Now that the first of these remedial measures are being established, they need to be nurtured; not challenged by increasing the stress the bay already suffers. There are sufficient small-scale, non-polluting, non-alienating, genuine “Working Harbour” enterprises that could make use of this/these sites without the need to resort to this scale of overdevelopment.

The twenty-four-hour-a-day, three-hundred-and-sixty-five-days-a-year availability of the facility is entirely inappropriate for a site just 200 metres across water from a residential area. Similarly, the three-hundred-and-seventy seat restaurant with 130 seats available at the water’s edge and operating until midnight, threatens the amenity of the residents opposite.

Given that there are so many offensive individual features in this proposed development, it is tempting to go on *ad infinitum* about each and every nasty feature. **But the real issue here is that it is the concept, the actual nature of the development, the absolute inappropriateness of the development that is the real problem.** Rather than tackle each and every feature in detail, this response will go on to look at some key elements that are of particular concern to our members, giving those that are closest to our hearts the most attention.

Water Quality

The Rozelle Bay Dry Boat Storage Facility DA is deficient in its coverage of water quality. It deals only with the localised area on land and in sediments close to the site. The DA does not take a holistic approach to the local Bays and their water quality. In doing so it therefore ignores the compounding effects of adding pollutants such as diuron, xylene and toluene to an environment already under heavy stress from pollution of sediments and biota with heavy metals and organic compounds including dioxin. The report of Birch and Taylor (2004) (Birch, G and Taylor S. E. *The contaminant status of Sydney Harbour sediments*. Handbook for the Public and Professionals; University of Sydney, 2004) lists Rozelle and Blackwattle Bays as near the top of the list for contaminants for all bays in the Harbour. White’s Creek and Johnston’s Creek are identified as strong sources of pollution from PCBs, dieldrin, DDT and lead. Thus the Rozelle Bay Dry Boat Storage Facility DA proposal is only likely to exacerbate an already highly impacted estuarine area.

Marine Ecology (Ecological Assessment, Chapter 18; Environmental Management and Monitoring, Chapter 33; Appendix)

The Rozelle Bay Dry Boat Storage Facility DA (Chapter 18 & 33 and Appendices J and Q) are deficient in not taking a holistic approach to the environment in which the DA is proposed i.e., Rozelle, Blackwattle and White Bay, and in viewing present water quality and marine biota as an acceptable baseline from which to start planning. In view of the intent of local Councils and Authorities to restore these areas to a more normal status, and giving regard to the impossibility of returning it to a pristine condition, it would be expected that some acknowledgement would have been made of the depauperate condition of the site and adjacent areas. No such attitude is to be seen. This myopic approach completely ignores the fact that the original status of this area would have been that of fringing mangroves, a healthy rock platform covered in algae succeeding to lush seagrass beds of *Posidonia australis* and *Zostera marina* on what are now described as mixed sandy

sediments. *Posidonia australis* remains have been identified as far up as the bridge over Johnsons Creek on Minogue Crescent. So *Posidonia australis* was undoubtedly widespread in all these bays, although there is a complete absence of seagrass at the present time. Restoration of seagrasses, alongside algae and mangroves should be a minimum requirement of any restoration plans for the area and only DAs that are compatible with this intent should be allowed. The view of the Glebe Society is that the potential for release of polluting chemicals from motor boats is high and demands a much more careful consideration of the facility on the local ecology and efforts to restore the marine ecology to a reasonable condition. Any such consideration should take account of the high contamination of the local bays by heavy metals and organics (see Section on “Water Quality” above).

The “Ecological Assessment” (Chapter 16) takes the attitude that there is very little in Rozelle Bay to preserve. The Chapter states (18.4 Aquatic Fauna) “Intertidal fauna was generally of very low species diversity” and “Subtidal fauna species diversity was also low dominated by sessile invertebrates and fish species. Sessile invertebrates were attached to the boulder stratum and generally comprised live and dead barnacles and mussels. Small numbers of anemones, ascidians, bryozoans and two unidentified species of sponge were also attached to the boulders”. These comments are not very surprising in view of the fact known for many years, that the fauna and flora of Rozelle Bay has been negatively impacted by a suite of environmentally adverse factors for the last 100 year. There is no consideration of a baseline for comparison. The present very depauperate baseline is taken as the yardstick and the conclusion is that there is nothing to worry about. No wonder the chapter is able to state (“Increased water turbidity and associated release of sediment contaminants”) “Potential impacts on marine biota as a consequence of increased water turbidity and release of contaminants are predicted to be low given that:

- Any plumes generated are likely to be small, localised and temporary in nature;
- No extensive algal beds or seagrasses were recorded in Rozelle and Blackwattle Bay and none were recorded in the immediate area where pile driving would take place.....

This part seems to refer to the installation stage and there is no equivalent section on the long-term impacts. It is our opinion that motor boats will stir up sediments from time to time, such as, for instance when engines are being tested, or when motor boat stray into shallower regions of the bay, or when their wash is enhanced by sudden changes of direction on days with rough water. Resuspension of toxic chemicals from the sediments then becomes inevitable. Furthermore it is the onus of the developers to prove that this will not happen in such a sensitive area.

Chapter 16 and relevant parts elsewhere in the DA ignore the clear directive to potential developers to set in place measures that will enhance and improve the natural environment, e.g. **Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2004:**

The planning principles for land within the Sydney Harbour Catchment are as follows:

- a) development is to protect, and where practicable, improve the hydrological, ecological and geomorphological processes on which the health of the catchment depends
- b) natural assets of the catchment are to be maintained and, where feasible, restored for their scenic and cultural values and their biodiversity and geodiversity
- c) decisions with respect to development of land are to take account of the cumulative environmental impact of development within the catchment
- d) action is to be taken to achieve the targets set out in Water Quality and River Flow interim.

Environmental Objectives for Sydney Harbour and Parramatta River Catchment, such as to be consistent with guidelines set out in Australian Water Quality Guidelines for Fresh and Marine Water. As mentioned above the pristine conditions of Rozelle Bay would have seen abundant seagrass beds, mangroves and salt marsh. It is our belief that proposed developments should be bench-marked to the extent that they aim to restore the natural environment.

Planning

The root cause of the problem is the Master Plan itself. While it should not be a part of our brief to criticise the Plan in this context, it is impossible to avoid doing so. If development is allowed to take place to the parameters set by the Master Plan, then the northern and eastern shores of Rozelle and Blackwattle Bays will be absolute eyesores with gross buildings walled along the foreshore eliminating views to and from the water. Further, the idea of any 24/7 facility in this area (and this site is not uncommon in terms of the Plan) is anathema given the dense residential development that has taken place along much of the Glebe foreshore and given the amphitheatre effect created by the natural landscape from the bays up to the ridges on the Glebe shore.

While it is probably fair to say that this proposed development is not all that far outside the parameters set by the odious Master Plan, it is oversized even by that Plan's gluttonous provisions. Rationalisations are made in the *Environmental Assessment* as to why it exceeds the Plan's parameters, but no matter how much rationalising is applied, it is greed that leads to the attempt to house 670 boats in two buildings occupying 10,000 square metres and soaring to over 90 feet on a shore that is entirely low-rise; and to house 362 vehicles in a combination of a multi-level carpark plus "at grade" carparks; and provide a further commercial building for boat sales and marine support and to house 370 patrons in a restaurant/café with 130 seated outside; and to build a marina occupying a vast area of the bay to store up to 60 boats. And all this without providing the required unhindered pedestrian foreshore access.

Visual Impacts

Clearly, a building reaching over 90 feet into the air on a shoreline of low-level buildings is unacceptable, particularly given the scale and bulk of this and the other three major buildings on the site. This development will dominate all view lines whether viewed from Glebe Point Road, Bicentennial Park, the foreshore walkway, The Crescent, The Western Distributor, Victoria Road, The Anzac Bridge...

That this heavy, bulky development is set against the elegance and lightness of The Anzac Bridge when viewed from Glebe and even more offensively from The Crescent and Annandale enhance it as a subject for derision.

Air Quality

The introduction of petrol and diesel fumes on this scale will be detrimental to walkers, bike riders and runners in the park and on the foreshore walk, and most particularly to the rowers and paddlers who at present use the water.

Noise

Our significant response in this area is by way of an appendix that has comments and queries on the methods employed and the results obtained in the *Environmental Assessment*. The points raised bring into serious question the deficiency of the assessment in this area.

Added to our concerns raised in the appendix about the quality of the assessment, are our concerns around the matter of Glebe's ambient noise. In the *Environmental Assessment*, Glebe's relatively high ambient noise and likely increase in ambient noise as the cross-city tunnel becomes more popular, is blamed squarely at The Anzac Bridge. We must question why it is assumed that as Glebe is noisy anyway, it is alright for the proposed development to make it a little noisier. Further, the assessment should have examined why the

bridge is so noisy for Glebe. A little research would have revealed that the baffle plates designed for the western side of the bridge were never installed (although the provisions for them remain) as they would inhibit views from the bridge and detract from its elegance from the land. Thus Glebe is considerably noisier than it should be even with the bridge. If we use the ambient noise as a base for future developments, let's apply those that should be prevailing in Glebe had the Anzac Bridge been completed to specifications.

Further, not enough recognition is given to the fact that noise is exacerbated as it travels across water. We have members who live well up Glebe Point Road who comment now when there are unusual sounds from the bays.

Traffic

We haven't set traffic as a major part of our brief as we expect other individuals and groups that will be more immediately impacted, to cover this area in detail. The major impact would obviously be in Annandale, Lilyfield and Rozelle. However it is fair to say that we now fear that steps, ramps and small wharves being developed in the park specifically for fishing (not encouraged at the moment) and for the launching of canoes and kayaks will become *de facto* collection/drop off points for friends/relatives of the boat owners. Not only will this result in more hazards for rowers/paddlers, it will result in increased traffic in Glebe and will exacerbate parking problems around Glebe Point Road, Federal Road, Northcote Road, Eglinton Road, Leichhardt Street, Oxley Street, Forsythe Street and Ferry Road.

While we are not responding specifically to the traffic generated in James Craig Road, The Crescent, Victoria Road, the Western Distributor... we do believe that there will be a cumulative impact given what is allowed in The Master Plan for the area; given that a major slipway proposal is already at the DA stage; and given that there remains great uncertainty as to the fate of the considerable areas around White Bay and the Rozelle Railway Goods Yard. Further, there is concern that should the development be allowed to go ahead, at some stages during and after development heavy trucks would find it convenient to use Annandale and Glebe's residential streets.

Sustainable Development

The Glebe Society believes that the Chapter 34 (Ecologically Sustainable Development) is misleading or even deliberately deceptive. As stated, the Commonwealth Government defined ESD as: "using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and total quality of life, now and in the future, can be increased."

On the basis of this statement how can it be ecologically sustainable to place a dry boat storage facility, in the most land-locked bay in Sydney Harbour, where large motor boats, up to 12m in length, must be driven over excessive distances, creating pollution and increased use of fossil fuels? Furthermore, why site this facility in one of the most contaminated bays of the Harbour where water movement is at a minimum and pollution will accumulate and not be diffused away. None of these activities will promote ESD, in contrast to the current more passive recreational uses of the Bay.

This is just the start of the Society's concerns. There are very few initiatives put forward in the DA to comply with best building practice in terms of ESD as, for instance, with the Olympic Village.

Impact on Traditional Users of Rozelle Bay

Rozelle and Blackwattle Bays have had a 120-year association with rowing. The 120-year-old rowing course has cultural and historical status that must not be ignored. Over the years the bays have been used for regattas, for training and, perhaps most importantly, for teaching/learning the skills of rowing.

More recently, dragon boats have shared the calm waters with the skiffs and sculls. Again the value of these bays' calm waters has been recognised for their assistance in nurturing new paddlers. So dramatic has been the increase in participants in this sport that the government has built them a launching ramp in Rozelle Bay.

While canoes and kayaks have always been paddled on these bays, the provision of launching-steps in Bicentennial Park (together with those around the walkway, and the launching ramp underway near Johnston Street) have facilitated and will continue to facilitate the ever-increasing numbers of these craft entering the bays.

It is not by chance that these land-locked, lake-like smooth bays nurture young rowers and paddlers. It is the very features that make them so unsuitable for powerboats that make them so valuable as rowing/paddling nurseries and training courses.

Conclusions

This proposed development has no redeemable features largely because it is so inappropriate to this site in terms of its purpose. Part of the problem rests with the Master Plan that, while not determining the absolute use of the site, does allow for monstrous building proportions quite out of scale and out of keeping with this shore and this bay. However any sized development that promotes the use of powerful, noisy, wake-creating, polluting power boats in an area traditionally the province of rowed and paddled craft, is inappropriate particularly when the main water area to be taken by these boats has heritage recognition for its 120 years as a rowing course.

Quite apart from the general inappropriateness of this type of development in this bay, this report establishes that the particular proposed development is inappropriate in terms of its:

- height, bulk and scale;
- design detail which produces a walled-effect along the northern shore;
- 24 hour, 7 days a week availability;
- noise generation at both the building and mature stages through both the boating and entertainment facilities;
- alienation of and increased danger to rowers and paddlers;
- reduction of air quality in the area through its introduction of petrol and diesel fumes;
- increased pollution in the bay from the boats themselves, through the risk of fuel spillage and from the increased stirring up of toxic sediments.

Appendices

COMMENTS ON THE NOISE IMPACT STATEMENT ON THE PROPOSED ROZELLE BAY BOAT STORAGE FACILITY (provided by Associate Professor Fergus Fricke, Dept. of Architectural Science, Faculty of Architecture, The University of Sydney)

There is a number of disturbing matters in the Noise Impact Statement which need some elaboration and explanation at the very least and possibly further investigation:

- 1 Measurements of sound levels were made with a B & K 2260 SLM but no information is given about its serial number or its certificate of calibration.
- 2 It is speculated that when the cross-city tunnel was completed that the measured noise levels at the three measuring positions at Glebe Point would increase by between 1 and 2 dB(A). Such an increase in noise level would require an increase of about 50% in the number of vehicles using the Anzac Bridge. It seems highly unlikely that there was a 50% increase in traffic volume between August 2004 and the present time but this should be checked with the RTA. The vehicle flow rates at the times of the measurements should be compared.
- 3 The background and ambient noise level measurements were made over a period of ten full days in July/August 2004. No mention is made of how representative or not measurements made, at this time, would be of measurements at other times of the year. Unfortunately these measurements will not be representative of summertime conditions because, in winter, the strength of temperature inversions will be greater at night than in summer and during the day, in winter, the lapse rate will not be as great as in summer (The effect of the lapse rate can be clearly seen in the measurements of background noise levels in Appendix B. As the normal lapse rate intensity increases, after sunrise, the L90 level decreases throughout the day between 7am and 5pm by up to 8dB (A), e.g. Thursday 29 July at 51b Oxley Street. On windy days, e.g. Tuesday 27 July, this effect is very much less, as would be expected under these conditions.). Both these conditions will mean that the noise levels from distant sources (such as traffic on the Anzac Bridge) will be greater in winter than in summer. This issue is also very important because in summer windows are more likely to be open for ventilation and so nearer noise sources and noise sources closer to ground/water level, such as boats, will be heard more distinctly above the lower background noise levels.
- 4 No meteorological data is presented with the ambient and background noise measurements. Some of the measurements were discarded because of wind but the wind speed and direction were not noted. It seems unlikely that some of the measurements were legitimately discarded because of wind as the noise levels shown in the Appendix B are sometimes minimum values rather than maximum values (the more usual reason for discarding values): see for example Tuesday 24 July between 2 and 4 am when the noise levels discarded from 501 Glebe Point Road are the lowest for the whole week and therefore perhaps seen as an embarrassment.
- 5 The “Measured Noise Levels” are presented in Tables 4-1 and 4-2. These are not measured values but rather they are probably “averaged” values of $L_{A,eq}$ and $L_{A,90}$, though what sort of average is not stated. Unfortunately this analysis of ambient and background levels lacks a statistical basis. Given that the noise measured noise levels show considerable variation it would be far more convincing if the 15 minute samples measured in a particular period, such as night time, were used to obtain the 90 or 95% confidence levels and that the lower confidence level was used to determine the existing conditions for assessment of sleep disturbance and other purposes.
- 6 The “averaged” values in Table 4-1 are used as the basis for the “Noise Criteria for the Development” shown in Table 5-1 and the sleep disturbance criteria. The low Sunday levels have now been subsumed into single figures for the week, season and year.
- 7 No mention is made of the much lower criteria recommended by the World Health Organization.

- 8 In section 5.1.2 it is stated that, “traffic noise levels are unlikely to reduce in future”. This gratuitous speculation could be overlooked except that it is used to justify the location of the boat storage facility without further consideration of future noise levels in the area. What is the basis for this statement? It could equally well be speculated (on current trends it might be better speculated) that the noise levels from road traffic could fall because of changes and improvements in vehicle technology (hybrid vehicles for instance), smaller motor vehicles, higher fuel costs, increasing use of public transport, the diversion of shipping to Newcastle and Port Kembla (as planned by the State Government), more people working from home using improved IT systems etc.
- 9 In section 5.1.2 the final sentence (“However consideration must also be given to the residential receivers.”) seems to be an attempt to avoid the complex and important issue of sleep disturbance, using a bit of hand-waving. The sentence is far from convincing and needs more explanation and justification.
- 10 In Table 5-1 the night time period should read “10 pm to 6 am”.
- 11 In Table 5-1 a better justification for the high morning shoulder for Saturdays and Sundays needs to be made. On Sundays in particular, there are relatively low traffic levels between 6 am and 9 am. This is clearly apparent from the noise measurements presented.
- 12 Section 5.1.1 needs to be rewritten in the light of the government’s decision to move the Glebe Island and White Bay vehicle import facilities.
- 13 Measurements of $L_{Aeq,15min}$ and $L_{A90,15min}$ are given in Table 4-2. In the comments column the sources of noise are indicated but there is no indication of whether these are peak readings or some other measure and nor is there any indication of how long these sources persisted during the 15 minute measurements
- 14 Again in Table 4-2 it is indicated that a 15 min monitoring was undertaken on Saturday 31/7/04 at 10.01am at location 3 and that a further 15 min monitoring was undertaken on the same day at location 2 at 10.17am. It is surprising that, in the comments column, there was no mention of the extraneous noise of panting or other indications or a rush from one location to another.
- 15 Likewise, on Monday 2/8/04, 15 min. measurements are reported for location 2 starting at 10:17pm and again at 10:31pm. If there was only one SLM in use there would have to be at least a 15 min separation between these two measurements and by the time comments were written down and the 15 minute sample stored 16 or 17 minutes between the start of the two measurements would be more likely.
- 16 Why were the dates and times chosen for the measurements?
- 17 It is clear how many unattended measurements were discarded and for what reasons but it is not clear how many attended measurements were discarded. How was it determined which of the unattended measurements should be discarded and which of the attended measurements should be discarded?
- 18 There is mention of wind noise at location 2 on Monday 2/8/04. Was this because the wind-shielding of the microphone was inadequate? How was the effectiveness of the microphone windshield determined and how was it determined that wind was the cause of the noise? Were measurements of wind gust speeds made?
- 19 Were the sources of noise mentioned typical of the area? In particular was the noise from tugs and bodywork repairers common ones.
- 20 Why weren’t measurements made of other boat storage facilities?
- 21 Why weren’t measurements made of background noise in the vicinity of residences in Pymont and Balmain as these residences could be affected by boats travelling to and from the boat storage facility (see also point 34 below)?
- 22 If the operating conditions relevant to Hobb Bros were not known (as stated in the report) why was a speculative condition reported on?
- 23 When did the Hobb Bros operation cease?
- 24 What is the basis for estimating the boat movements in Table 7-1?

- 25 It is suggested in section 7-1 that there will be no boat movements from 9pm to 6am. Again what is the basis for this?
- 26 In section 7-2 there is the statement that, “For the assessment of hourly boat movements the logarithmic average of all the boat measurements at 8 knots has been used in our calculation”. This sentence is nonsensical.
- 27 Details of how the sound power of an FLT in action are not given. Such measurements are subject to large errors for a number of reasons.
- 28 Where were the sound power levels presented in Table 7-2 obtained? In particular it is assumed that the 77 dBA for boat movements in the bay was obtained by measurements but the details of how the sound power was measured (to what standard) are important. While the boat types considered are stated no information is given on the sound power of each type and no evidence is presented that these boats are representative of existing boats. The sound power of eight boats given in Table 7-2 (77 dBA) seems very low compared with the sound power of cars and patrons used.
- 29 The details of the measuring locations are not clear but it is surprising that the measured noise levels are significantly higher at location 1 than at location 3 (as both measurements were made at the same distance from the major traffic noise source and subject to the same maritime activities) unless the measurements were made under dissimilar conditions. One possibility for this is that the measurements at the two sites were not made at the standard height of 1.2 m above ground level or that the two measuring systems were not identical in their calibration or performance. Another possibility is that one of the measuring locations was close to a building or other reflective surface while the other was not. Yet another possibility is that the measurements at location 1 were made facing Glebe Point Road rather than the waterfront. If any of these possibilities is correct then there is concern for both the representativeness and efficacy of the measurements. If none of these possibilities is correct then there is a need to explain the difference in the $L_{A,eq}$ and $L_{A,90}$ levels at the two locations.
- 30 In section 7-3 second paragraph, second sentence it is stated, “These conditions are assumed to (but may not) occur from source to receiver”. Presumably this refers to the wind direction as it could not apply to the temperature gradient. But as there are distributed sources (vessels and FLTs for instance) how were the adverse temperature and wind conditions as well as the distributed sources taken into account?
- 31 It is not clear whether all the noise sources were considered together in the ENM program to obtain noise levels. Nor is it stated where the vessels were located for the calculation or where some of the data on sound power values was obtained and what directionality of the sources was used.
- 32 It would be very valuable to have measurements from a similar existing boat storage facility.
- 33 In section 10 it is stated that the building of the boat storage facility might result in a reduction of noise due to the realignment of James Craig Drive. If existing traffic on James Craig Drive is a significant noise source, its reduction may be of concern to the proponent as the background noise levels will be reduced. As the issue has been raised in the report as being possibly of significance it should be investigated.
- 34 The $L_{A,eq,15min}$ criteria presented in Table 7-3 do not seem reasonable for a number of reasons which have been referred to above but it is worth reiterating two of them. Firstly Table 7-3 is for summertime weekdays while the measurements made of ambient noise levels were made in winter. An adequate statistical analysis of the measured sound levels has not been carried out.
- 35 In the “Morning Shoulder Period” in Table 7-2 the sound power of one boat is given as 68 dBA and the maximum sound level at the residences at the end of Glebe Point Road as 99 dBA. If the 68 dBA figure is correct then the boat would have to pass within 0.01 metres of the residence to give a maximum noise level of 99 dBA. This seems unlikely to say the least. If the 99 dBA figure is correct and it is assumed the boat is no closer than 100m from the nearest residence then the sound power of the boat is 148 dBA. Again this seems unlikely (but more likely than the boat

passing within 1 cm of the nearest residence) and is far in excess of the assumed boat sound power of 68 dBA. It is more likely that both the figures given in the Table are incorrect

Tabulation of the Glebe Society's concerns over the Rozelle Bay Dry Boat Storage Development Application in relation to existing regional and local plans

Compliance with the Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2004		
Part 2 Planning principles	Requirements	Comments
13 Sydney Harbour Catchment	The planning principles for land within the Sydney Harbour Catchment are as follows:	
	a) development is to protect, and where practicable, improve the hydrological, ecological and geomorphological processes on which the health of the catchment depends	Development will lead to pollution from fuel spills, antifouling on boat hulls, engine exhaust emissions to the detriment of the local ecology
	b) natural assets of the catchment are to be maintained and, where feasible, restored for their scenic and cultural values and their biodiversity and geodiversity	Development does nothing to restore natural biodiversity in the surrounding bays and will impact negatively on attempts to restore wetlands, mangroves and seagrasses
	c) decisions with respect to development of land are to take account of the cumulative environmental impact of development within the catchment	Development takes no account of other proposed developments in the surrounding bays and the impact of, for instance on more yachts or the accumulation of antifoulant chemicals
	d) action is to be taken to achieve the targets set out in Water Quality and River Flow interim Environmental Objectives for Sydney Harbour and Parramatta River Catchment, such as to be consistent with guidelines set out in Australian Water Quality Guidelines for Fresh and Marine Water	Stirring up of sediments with heavy metals and dioxins (and other toxic organics) will nullify these objectives. This especially applies to Rozelle Bay which has very poor circulation and is already heavily polluted
14 Foreshores and Waterways Area	The planning principles for land within the Foreshores and Waterways are as follows	
	a) public access to and along the foreshores should be increased, maintained and improved	Public access to the foreshore is being denied on. Public footpaths are to be located at the back of the site. There is surely a way to allow limited access along the shoreline with restriction during the moving of boats and yachts

21 Biodiversity, ecology and environment protection	The matters to be taken into consideration in relation to biodiversity, ecology and environmental protection are as follows:	
	c) the need for development to avoid indirect impacts on aquatic vegetation such as changes to flow, current wave action and changes to water quality	Pollution from boat usage and stirring up of toxic sediments will not achieve this objective. At best it will result in the status quo/ At worst it will lead to further environmental degradation.
	d) the need for development to protect and reinstate natural intertidal foreshore areas, natural landforms and native vegetation	Development does none of these things. The claim is that natural vegetation is either not present or in very low amounts. The development will impact negatively on attempts to restore wetlands, mangroves seagrasses and algae to the local bays
22 Public access to foreshores and waterways	The matters to be taken into consideration in relation to public access to the foreshores and waterways are as follows:	
	a) the need for development to maintain and improve public access to and along the foreshore	Public access to the foreshore is being denied. There is surely a way to allow limited access along the shoreline with restriction in certain locations and during the moving of boats and yachts
Part 6 Wetlands protection		
61 Objectives	The objective of this plan in relation to wetlands are:	
	a) to preserve, protect and encourage the restoration and rehabilitation of wetlands, and	The release of pollutants from boats and boat hulls and release of noxious chemicals and heavy metals from the bay's sediments will be detrimental to attempts to restore wetlands in Bicentennial Park and elsewhere
	b) to maintain and restore the health and viability of wetlands	The above comment applies
Compliance with Rozelle Bay Master Plan		
Planning Principles	Requirements	Comments
Land Use	A pedestrian and cycle connection is to be included along the alignment of the internal access road for Rozelle Bay and along Pymont Bridge Road in Blackwattle Bay	Public access to the foreshore is being denied. There is surely a way to allow limited access for pedestrians and cyclists along the shoreline with restriction at certain locations and during the moving of boats and yachts

2.4 Ecologically sustainable development principles		
Environmental management plan	An Environmental Management Plan (EMP) must accompany development applications for each of the Rozelle and Blackwattle Bay Sites. The EMP is to address ESD principles, stormwater management, water quality, noise management, retention and recycling of buildings, contamination, management during demolition, removal and construction phases, waste management and waste minimisation	An EMP is not presented as such but is incorporated within the DA. It is possible that it is for this reason that the DA ignores problems in the local bays, and ignores wider issues of its existence such as the effect of yachts moored in the bay which will cause several problems including leaching of diuron and other chemicals from hulls and over-crowding of the Bays and stirring up of toxic chemicals, which are known to exist above safe levels in the sediments of the bay
Marinas and boat repair facilities	Development applications should address the Environmental Protection Authority's Environmental guidelines for Best Management practices for Marinas & Boat Repair Facilities (1999) with particular reference to liquid waste, solid wastes, spray operations, TBT paint avoidance, solvents and cleaning agent odours, stormwater, excessive noise, sewage, grey water and bilge water requirements	The release of these toxic chemicals from boat hulls, such as diuron, should not be allowed. Development will generate unacceptable noise levels for surrounding residential areas. Storage of flammable fuel poses the risk of explosions and fire.
Pedestrian and cycle links	Pedestrian and cycling links are to be provided through the precinct and integrated into adjoining areas	Public access to the foreshore is being denied. There is surely a way to allow limited access for pedestrians and cyclists along the shoreline with restriction at certain locations and during the moving of boats and yachts
	Pedestrian links should recognize safety and security issues associated with commercial working waterfront and maritime activities	Agreed, but see comment above
Waterfront access	Working waterfront access for the public should be provided to the foreshore on the limited basis during business hours subject to restrictions for safety or security reasons associated with ongoing maritime operations. Measures for maintaining such access into the future need to be introduced	Public access to the foreshore is being denied. There is surely a way to allow limited access for pedestrians and cyclists along the shoreline with restriction at certain locations and during the moving of boats and yachts
	Access to the waterfront should be provided	Public access to the waterfront is being denied.

Compliance with Sydney Harbour Foreshore and Waterways Development Control Plan

Planning principles	Requirement	Comments
General requirement	Public access to waterways and public land is maintained and enhanced	Public access to the foreshore is being denied. There is surely a way to allow limited access for pedestrians and cyclists along the shoreline with restriction at certain locations and during the moving of boats and yachts
	Congestion of waterway and foreshore is minimised	Development will generate a very significant increase in water traffic to detriment of recreational boating and sporting activities on the Bays. This development has to be taken into consideration alongside other potential proposals for Rozelle and Blackwattle Bays which will undoubtedly see greatly increased number of boats and yachts. This is incompatible with use of Rozelle and Blackwattle Bays by rowers, dragon boats and kayaks.
	Conflicts on the waterway and foreshore are avoided	Development will conflict with both. For waterway, see above. For foreshore see comments on access to waterfront
	The development does not interfere with navigation, swimming or other recreational activities	Development will interfere with navigation, recreational and sporting activities, especially of rowers and dragon boats.
Foreshore access	Foreshore access is to be encouraged and promoted. Wherever possible, public access to and along the foreshore should be secured or improved	Public access to the foreshore is being denied. There is surely a way to allow limited access for pedestrians and cyclists along the shoreline with restriction at certain locations and during the moving of boats and yachts
Environmental management	Potential pollutant sources from the site must be controlled and meet established performance standards	Air pollution from motor exhausts will be a potential problem
	Appropriate controls are to be in place and managed to prevent any pollutants entering the environment	Development cannot prevent chemicals from spillages and boat hulls getting into the water column
	The adverse impacts of noise (considering hours of operation, existing background noise, expected departure/arrival times of vessels, noise level of marine patrons, noise level repair and testing of vessels and	Development will generate unacceptable noise levels for local residential areas through night-time activities for pickup and re-entry of boats up to 12 m in length.

	motors) are to be minimised through appropriate design and management measures.	
Foreshore access	Foreshore access is to be encouraged and wherever possible, public access to and along the foreshore should be secured or improves	Public access to the foreshore is being denied. There is surely a way to allow limited access for pedestrians and cyclists along the shoreline with restriction at certain locations and during the moving of boats and yachts