

# **Independend Planning Commission (IPC) Submission**

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## **Introduction**

We are residents of the evolve\* building in Bowman Street, Pyrmont, which is the nearest building to Glebe Island on the Pyrmont side, about 150 metres away. We moved here in January 2013.

David (the writer of this submission) has been actively involved with the Jacksons Landing Coalition Inc. (JLCI) for about 3 years, during which time the focus has been on the NSW Port Authority (PA) Multi-User Facility (MUF) project and the Hanson concrete plant project. He was also Chair of the evolve\* Strata Committee for 2 years and a member of the committee for two years prior to that.

We recommend that the Commissioners read in detail the JLCI submission to the IPC. It strongly reflects our views about the project and David provided input into the submission, including some review and editing. The JLCI document is 39 pages, including photos, but the length reflects the significant concerns we have in regard to a range of issues associated with the project.

Rather than simply repeating the JLCI submission, we would like to briefly highlight some of the specific concerns that we believe are the most significant in respect to the proposed project.

## **Planning Inconsistency**

Until very recently, the most recent strategic document for the Bays Precinct relevant to Glebe Island was the Bays Precinct Transformation Plan (BPTP) of October 2015. It was recently superseded by the draft Bays West Place Strategy (BWPS) of April 2021.

Between these two strategic plans, numerous ad-hoc planning decisions have been made affecting the area, including the Sydney Fish Market, the MUF, the White Bay Power Station, the Metro stations in White Bay and Pyrmont, and the plan to build a new high-rise hotel at the Star Casino. We support some of those projects, but the projects seem to have been approved in a strategic vacuum.

In fact, the draft BWPS includes the Hanson concrete plant, despite it still being under review by the DPIE at the time of the release of the draft BWPS, and before it was even referred to the IPC. The draft BWPS also includes a restoration of the old Glebe Island Bridge for pedestrians and cyclists, which will pass directly next to the proposed concrete plant.

The proposed Hanson concrete plant is incompatible with a number of the projects already mentioned, but also with the general theme of the draft BWPS, which is to make the Bays Precinct more of a public, residential and commercial space, whilst retaining some elements of a working port.

### **“A Working Port”**

The DPIE and Hanson have also consistently argued that Glebe Island has been a “working port” for over 100 years and that it should continue to be so. It is very important to note that the proposed Hanson concrete plant is in fact a manufacturing facility and well outside the scope of what could be considered normal “working port” activities. The addition of such a facility on Glebe Island would be a major deviation from historical activity on Glebe Island for the last hundred years, and is totally inconsistent with other plans for the area. Also, during the last 12 years or so, all of the high-rise residential buildings at the western end of Jacksons Landing were built, with a corresponding influx of new residents.

### **“Business as Usual”**

The Department of Planning, Industry and Environment (DPIE) and Hanson has consistently argued that the proposed concrete plant is just “business as usual” for Glebe Island. How can the addition of a massive manufacturing facility be “business as usual”, when it has not occurred there for about a century? When we first moved here in early 2013, and for about the previous three years, there were only about 4-6 large ships per year into and out of the Pyrmont side of Glebe Island. That has remained the situation to this day. That frequency of ships will increase exponentially (see Noise Section below). At the time that we moved here, we were aware of Government plans to transform and urbanise the Bays Precinct, culminating in the release of the BPTP in October 2015, but with an expectation that part of Glebe Island would remain a working port.

### **Noise**

Hanson has been quite evasive about the noise impacts of its proposed onshore manufacturing facilities. However, we believe that the biggest issue has been, and will certainly continue to be, ship noise.

When we talk about ship noise, we also include vibration, which is another important factor that is sometimes underestimated. Ship noise can come from a number of sources, some intermittent and some continuous. Intermittent noise is the worst, because it is random and unexpected, particularly at night. Intermittent noise includes:

- Ships arriving and leaving, with engines revving.
- Tugs assisting ships to arrive and leave.
- Opening and closing of ship’s hatches.
- Maintenance of the ship while it is in port.

Continuous noise is mainly the running of the ship’s generators and engines whilst in port, which can also be variable.

We have already stated above that the norm for large ships on the Pyrmont side of Glebe Island for more than a decade has been 4-6 per year. However, what none of us envisaged is the proposed huge increase in shipping frequency as a result of new projects, one of which is the proposed Hanson Concrete Plant. The Hanson Concrete Plant will host about 120 ships per year for importing aggregate, the PA’s MUF will host about 80 ships per year for importing sand and there is also a plan to double the throughput of the cement silos on the Balmain side of Glebe Island from 600 thousand tonnes per year to 1.2 million tonnes per year, which will also increase ship movements. So, the number of vessels arriving at the Pyrmont side of Glebe Island will change from 4-6 per year to about 4-5 per week. It is hard

to understand how that number could even be scheduled and accommodated. Please also note that this means that the total number of ship movements on the Pyrmont side of Glebe Island, in and out, will be 400 per year. The expected duration of the Hanson ship in port is about 12 hours each, with the MUF ships expected to be in port for 30-40 hours each.

In response to widespread community concerns, the Port Authority launched a draft Port Noise Policy last year and implemented it on January 1<sup>st</sup> this year, after receiving feedback from a range of interested parties including residents. It is a highly complex document, but the following is important to note:

- The noise limits in the policy are far too generous to the ships, based on our lived experience of ship noise in the past.
- The penalties for not abiding by the policy are far too lenient and take too long to implement.
- Our lived experience with the Port Authority is that they lack the power and/or the desire to make meaningful changes to ship noise.
- The PA has admitted that at least one ship that has docked at Glebe Island this year did not comply with the policy, resulting in some days of sleep interruption and, despite complaints, nothing changed.

We have been made aware through the recent planning processes that the apartment buildings built in the last 10-12 years in Jacksons Landing, which includes all of the high-rise buildings at the western end, were fitted with extra noise mitigation measures, as some protection against port noise.

The DPIE's main response to the noise issue is to suggest that the noise mitigation measures built into our apartment buildings will solve the problem. Firstly, that implies that they are expecting us to have our doors and windows shut 24/7, which is entirely unreasonable. No one in their right mind would have purchased in this area under those conditions. Secondly, we know from lived experience that, even with our windows and doors shut, that the noise and vibration from some ships and tugs penetrates into the apartment and causes sleep deprivation. If the Hanson concrete plant goes ahead, the State Government is going to expose itself to installing extra noise mitigation measures in those apartments, which would be impractical and costly.

### **Visual Impact**

The negative visual impact of the proposed concrete plant will be significant, both looking from the ANZAC Bridge and looking towards it. The ANZAC Bridge is visible from both the Sydney Harbour bridge and Barangaroo and many other prominent viewpoints around Sydney. The height of the concrete plant silos is proposed at about 34 metres, which is higher than the ANZAC Bridge carriageway, and 140 metres wide. The other structures in that area, with the exception of the cement silos, have been approved during the last 20 years and great care was taken during those planning processes to restrict the height of those building to well below the ANZAC Bridge carriageway height. The cement silos were built under an older planning regime and do not provide an excuse for building similar-sized structures as part of the proposed concrete plant, that will directly impact on the views to and from the ANZAC Bridge.

What do international visitors see when they dock on a cruise ship at White Bay? The ANZAC Bridge. Will they now see a concrete plant? What do international visitors see when they fly into Sydney from the north? Glebe Island. Will they now see a concrete plant?

### **Air Pollution**

With the significantly increased frequency of ships, the smell and taste of fumes from the ships will become a daily occurrence. Of equal concern is the threat of dust from the concrete plant, which Hanson wants to operate 24/7. From a cursory review of the website of the NSW Environment Protection Authority (the EPA), it appears that Hanson has breached one of its Environmental Protection Licences on at least eight occasions and has received at least six penalty notices from the EPA. It has also been fined by the EPA on two occasions, once for an alleged repeat air pollution offence. This does not give us any confidence that Hanson will be a good corporate citizen and we are also not comfortable that the PA will do much to control Hanson's activities because of its landlord/tenant relationship.

### **Duration of the Concrete Plant**

Hanson is spending \$22 million on this proposed plant. It is not a temporary plant. Hanson's manufacturing plant and its infrastructure are not temporary. It will be there for at least 20 years if Hanson is to get an adequate return on its investment. This will severely limit any plans for future development of the White Bay and Glebe Island precincts.

This area has been promoted as a potential innovation hub. The Metro station at White Bay will stimulate residential and commercial development of the area. A concrete plant is totally inconsistent with those plans. If the concrete plant is put in place there will be a public cost associated with its daily operation in terms of the liveability of the area, but there will also be a potential public cost in getting rid of it in the future, once it is realised that it is no longer useful or that better use can be made of that valuable land.

### **Conclusions**

The State Government's desire to reduce the amount of traffic on Sydney's roads by encouraging shipping is a laudable one. However, the solution causes a range of significant issues in and around Glebe Island, one of Sydney's most important landmarks. Glebe Island should not be wasted. Given all of the above, we cannot see that this project is "in the public interest".

We have only dealt with some of the specific issues that we believe are the most significant in respect to the proposed project, but there are many other issues with the Hanson proposal, including truck congestion in an already very busy area, marine congestion in already busy waterways and the impact of lights from the ships, trucks and the manufacturing plant itself.

The proposed concrete plant encompasses an industrialisation of Glebe Island that is totally out of step with its historical use and with recent planning objectives. It will be an eyesore and a source of pollution that should be placed elsewhere.

In our submission we have not suggested any conditions under which the concrete plant, together with its associated pollution and frequent ship traffic, should go ahead. We would like it stopped. Most residents that we speak to in Pymont feel the same. However, you will likely receive many suggested mitigation conditions in submissions by others, both verbal and written. Many of the submissions you will receive may say something like:

“However, if the concrete plant is built, its design and/or its operations processes, should be modified as follows.....”

Even though many people do not want the concrete plant to go ahead at all, they are hedging their bets by proposing modified conditions, just in case the plant gets approved. Unfortunately, given the lack of acceptance of suggestions made in public submissions by both the PA and the DPIE, there is a lack of confidence amongst the public that the plant can be stopped.

It is up to the IPC to do so.

Please stop this concrete plant or, at the very least, impose conditions that will make this residential and leisure area liveable, especially at night, but also during the day, because of retirees in the area and also people working from home in this new COVID environment

Thank you very much for allowing verbal and written submissions. We really appreciate the opportunity for input.