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20 May 2021

Submission to the Independent Planning Commission

Glebe Island Concrete Batching Plant and Aggregate Handling Facility SSD 8544

Thank you for this opportunity to provide a submission on the Department of Planning, Industry and Environment's (the department) assessment of the Hanson application.

I gave an oral submission on the visual impact issue. A detailed written analysis of that issue is included at the end of this submission. Before that I have set out a summary of my conclusions, followed by my views on some of the specific problems with the department's assessment and the Hanson proposal.

Summary of conclusions

The department's assessment is woefully inadequate. It contains numerous errors and omissions, and places excessive reliance on Hanson's own analysis and assertions. In particular, it downplays the many problems with what Hanson proposes, and overstates the potential benefits.

The key problems of the Hanson proposal can be summarised as follows:

- An ugly plant on a prominent site on the inner Sydney harbour ruining the outlook from foreshore parks and walks and defacing views to and from the ANZAC bridge for decades to come.
- Inconsistency with other state plans and strategies.
- The adverse social and economic impact on the imminent redevelopment around the Bays West metro station and the rehabilitated White Bay Power station, and on the plan to create a better connection from the CBD and Pymont to the west via a rehabilitated Glebe Island bridge.
- The economic opportunity cost of tying up Glebe Island as an industrial zone and making it unavailable for other commercial uses.

- The waste of the last great public space in the inner harbour available for public amenities such as sports fields/arenas, theatres, parks, museums, and the continuation of Sydney's wonderful foreshore walk.
- Noise exceedances of 4-5 decibels during every period of the day including in the evening and at night resulting in residents in Jackson Landing having to live with their doors and windows permanently closed.
- Greater air, water, and light pollution.
- Increased water and truck traffic congestion.
- Reduction in Pyrmont property values.

In spite of this vast array of problems, the department claims that the Hanson proposal would be in the "public interest". This claim rests on two purported benefits – facilitating the supply of concrete to inner Sydney and removing trucks from Sydney's roads. Even if these benefits were real, they are far outweighed by the problems listed above. In any event, for the reasons outlined later in this submission, these benefits either do not exist or are greatly overstated by the department.

In view of the extensive range of problems, and the narrow benefits, I submit that the Commission should decline Hanson's application.

If the Commission decides to allow the application with conditions, I submit that it should require the plant to be relocated so that it would sit next to the Glebe Island silos. (This was suggested by the City of Sydney several years ago.) This relocation would significantly lessen the adverse visual impact of the plant and would reduce the impact on nearby residences. It would also be right beside the Cement Australia facility which would provide the Hanson plant with cement.

If the Commission decides to allow the application with conditions, whether relocated or on the proposed site, as a minimum the following additional conditions should be imposed.

1. The concrete plant should be fully acoustically insulated.
2. The unloading of aggregate from the silos into trucks should occur inside a fully acoustically insulated area.
3. The operating hours of the concrete plant and the aggregate handling facility should be restricted to 7am to 8pm Monday to Saturday.
4. The arrival, departure, and presence at berth of the Hanson vessel should be restricted to 7am to 10pm Monday to Saturday. The vessel would only require 12 hours at berth so it could easily operate within these hours. A certain number of breaches would be acceptable each year to allow for unforeseen circumstances and exceptional weather conditions.
5. If the Hanson vessel was not subject to restricted hours, there should be a requirement to use shore to ship power no later than 2028.

Need and justification

Given all the undeniable downsides that this proposal would bring, it would need some very compelling upsides to warrant approval. In other words, Hanson and the department would have to provide evidence of major benefits for Sydney to justify all the proposal's problems.

What are the justifications put forward in the department's assessment? There are two – the supply of concrete to inner Sydney and the removal of trucks from Sydney roads. Neither is what it seems.

The supply of concrete

Part 1.5 on page 6 of the department's assessment is headed up "Need and justification". It states as follows:

The Applicant advises the proposal is required due to the demolition of its concrete batching plant on Bridge Road, Glebe (at the head of Blackwattle Bay), for construction of the new Sydney Fish Market. The Applicant also advises the proposal would seek to replace the shortfall from the Hymix (a subsidiary of Hanson) concrete batching plant at Bank Street, Pyrmont, expected to be demolished to facilitate the renewal of the Blackwattle Bay District (formerly known as the Bays Market District).

This is quite unequivocal. The proposed concrete plant on Glebe Island is needed to replace Hanson's former plant on Bridge Rd and the to-be-demolished Hymix plant on Bank St. Anthony Witherdin, the department's Director of Key Sites, repeated this justification almost word for word at the Commission's meeting with the department on 6 May (page 3 of the transcript).

However, at its meeting with Hanson on 6 May, the Commission discussed this issue with representatives of the company. Hanson's Development Manager, Andrew Driver, provided the following clarification (page 21 of the transcript):

***Just to be clear, and I don't know** – we have a lot of discussions with the Department of Planning but the conclusion that Glebe Island, you know, is a replacement for our Blackwattle Bay operations, I don't think that's correct to say. And it is also not a replacement for the Pyrmont operations which is – you know, one's under a separate brand.*

Mr Driver is very clear. The proposed concrete plant is **not** a replacement for Hanson's former Bridge Rd plant, and it is **not** a replacement for the current Hymix plant.

Mr Diver's answer is entirely consistent with Hanson's submission just six months ago on the Pyrmont Peninsula Place Strategy (PPPS) - https://shared-drupal-s3fs.s3-ap-southeast-2.amazonaws.com/master-test/fapub_pdf/00%20-

[%20Planning%20Portal%20Exhibitions/Pyrmont%20Exhibitions/\(127\)+Hanson+\(Hymix\).PDF](#) . In that submission, Hanson makes it clear that it intends to continue operating the Hymix plant for many years to come. Hanson states that "the existing Hymix concrete batching plant is of **critical importance** to the Hanson/Hymix network". Part of the submission is headed "Hanson's Future Vision for Hymix Site". Significantly, that submission was made to the Department of Planning, Industry and Environment.

Something is wrong here. The department's assessment says that the "need and justification" for the proposed Glebe Island plant would be to replace the Bridge Rd and Hymix plants, and this was reiterated by Mr Witherdin directly to the Commission. But that is the exact opposite of what Hanson told the Commission and the department itself in the context of the PPPS.

Who is to be believed here? At the Commission's meeting with the department on 6 May the following exchange occurred (page 3 of the transcript):

MS TUOR: So just on the Hymix Plant, you said that that is to deal with the shortfall from that, and that that's proposed also to be demolished. Is there a timeframe for that to be demolished at all?

*MR WITHERDIN: Look, in terms of those statements, you would basically need to talk to the applicant to get any further information about those facilities. **They didn't form strictly a part of the application.** So that information would be best sought from the applicant.*

Two things stand out. First, Mr Witherdin makes it clear that Hanson is the only reliable source of information about the closure of the Hymix plant. Hanson has made it clear that it has no intention of closing that plant.

Secondly, and more disturbingly, according to Mr Witherdin considerations regarding the Hymix plant "didn't form strictly a part of the application". This contradicts the assessment which identifies the replacement of the Hymix plant as a key justification for recommending the application.

The bottom line appears to be that the proposed plant would not replace either the existing Hymix plant or the former Bridge Rd plant. (The latter is obvious anyway given that there would be at least a four-year gap between the closure of the Bridge Rd plant and a new Glebe Island plant.)

This constitutes a fundamental flaw in the department's assessment. The primary justification given for the proposed plant is factually incorrect.

No doubt Hanson would argue that even though a Glebe Island plant would not be a replacement for other plants, it would still be useful to meet Sydney's demand for concrete. At the Commission's Public Meeting on 17 May, a Hanson representative provided a comprehensive list of some major projects in Sydney that will require concrete in the future. The implication was that somehow a concrete plant on Glebe

Island would be vital to such projects. That is of course nonsense. The absence of a concrete plant on Glebe Island would not prevent any of those projects proceeding. Hanson or one of its competitors would satisfy the demand from other plants.

While a new concrete plant on Glebe Island might be commercially advantageous for Hanson, that would not come close to justifying the plethora of adverse impacts that the plant would cause for local residents and the wider city.

The removal of trucks

A secondary justification for the Hanson proposal given in the assessment is the removal of trucks from Sydney's roads. This justification is somewhat vague but the best expression of it is on page 34:

The Department considers the proposal would result in benefits for the wider road system as the shipping of raw materials to the site would substantially reduce the number of truck movements that would otherwise be required.

This justification is not supported by any detailed analysis or evidence.

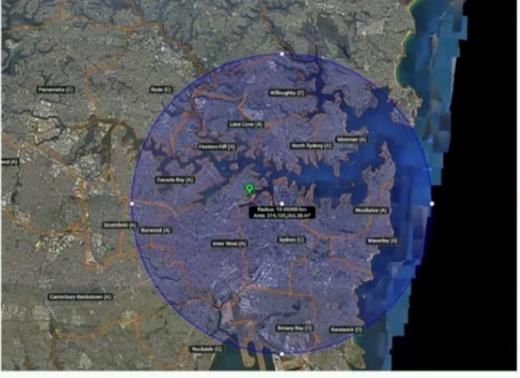
At the meeting on 6 May, the Commission raised with Hanson the issue of how much material would be delivered by ship. Specifically, Commissioner Tuor sought clarification regarding "the amount of material that's delivered by ship compared to the amount that's delivered by truck." Hanson's Development Manager, Andrew Driver, replied "Rough, rough, don't quote me on this, but I would expect it would probably be in the order of 10 per cent". (Pages 21-22 of the transcript.)

It appears that, even though this facility would be built on a prime waterfront site in the heart of Sydney, 90% of the materials coming to the site would be brought by truck. At the Public Hearing, Mr Driver indicated that this is because many of the materials used come from 'land-locked' sources.

In his presentation at the Public Hearing, Mr Driver also explained that a significant proportion of the materials brought into Hanson's Glebe Island site by ship would then be distributed by truck to other Hanson/Hymix plants around Sydney. He provided the following slide to illustrate the area that would be serviced from Glebe Island.

Why Glebe Island

- According to the *Supply and Demand Profile of Geological Construction Materials for the Greater Sydney Region, 2019*, commissioned by DPIE, the per capita consumption of extractive materials is around 3.5 tonnes per capita per annum.



| | 2016 | 2020 |
|-------------------|----------------|------------------|
| Sydney | 208,347 | 248,736 |
| Inner West | 182,043 | 201,880 |
| Hunters Hill | 13,199 | 14,962 |
| Lane Cove | 36,051 | 40,534 |
| North Sydney | 67,658 | 75,094 |
| Mosman | 28,475 | 30,785 |
| Willoughby | 74,302 | 81,196 |
| Woollahra | 54,240 | 59,431 |
| Botany Bay | 46,654 | 51,838 |
| Waverley | 66,812 | 74,276 |
| Randwick | 140,660 | 156,619 |
| Canada Bay (Half) | 44,008 | 48,275 |
| Burwood (Half) | 18,405 | 20,433 |
| Total | 980,853 | 1,104,059 |

Population by LGA

09:42:55 **Hanson**
HEIDELBERGCEMENT Group

I found this slide confusing. The blue circle goes far into the south of Sydney, even encroaching on to Botany Bay. Is Hanson saying that some materials would be brought by ship up the coast from the Bass Point quarry, past the Port of Botany Bay, and into the heart of Sydney, only to then be unloaded at Glebe Island into trucks that would deliver them south again to locations closer to Botany Bay? Surely it would make more sense, and result in less truck traffic, if areas closest to Botany Bay were serviced by aggregate delivered direct to Botany Bay.

Obviously, all this is outside my area of knowledge. However, the analysis of this issue in the assessment is inadequate. Just how significant is the removal of trucks as a justification for the Hanson plant? What is the evidence? The roads around Glebe Island, Bays West, and the ANZAC bridge are already highly congested. Would it make sense to turn Glebe Island into a trucking hub for the distribution of materials throughout Sydney, thereby exacerbating the congestion?

Conclusion

As summarised above, the Hanson proposal would create a wide range of significant problems. The benefits required to justify such a damaging proposal would have to be enormous and indisputable, and they would have to accrue to Sydney and Sydneysiders. The justifications identified in the department's assessment certainly do not meet those requirements. More than that, the assessment appears to have some fundamental flaws. Key elements of it do not seem to reconcile with the apparent facts as provided by Hanson. The proposal offers nothing but problems for Sydney and the only winner would be a private business ultimately owned by HeidelbergCement group, a German building materials conglomerate.

General observations

Uncertainty

Having read the transcript of the Commission's meeting with Hanson, I am concerned that at this late stage Hanson is seeking to amend its application. Surely, by this point Hanson should be expected to have finalised its proposal. How can there be amendments of a proposal that the department has already assessed and recommended? Will the public be able to make submissions on the new version of the proposal? This is concerning for local residents who would be so badly impacted by the proposal.

Conflicting state plans

Many aspects of the assessment conflict with various plans and strategies released by the state in recent years, including the Bays Precinct Transformation Plan, the draft Bays West Place Strategy, and the PPPS. The department's response seems to be to undertake a selective analysis, highlighting those elements that are consistent with its recommendation of the Hanson proposal and ignoring those that are not.

As a Pymont resident, I think the department's PPPS is a wonderful strategy. However, having read the department's assessment of the Hanson proposal, I now suspect that the PPPS is just spin. It describes all of Glebe Island, including the Hanson site, as part of Sydney's "Innovation Corridor". It waxes lyrical about the wonderful views from Pymont and about protecting and improving the suburb's foreshore walks and parks. It even advocates rehabilitating the old Glebe Island bridge as part of a major objective of developing connections between Pymont and Bays West.

The Hanson proposal self-evidently conflicts with all this. The proposed concrete plant would remove any prospect of innovation on Glebe Island in the next twenty-five years. It would desecrate views from Pymont and diminish the appeal of its foreshore walks and parks. Most obviously, it would effectively scuttle any chance of a link between Pymont and Bays West across the old Glebe Island bridge.

Failure to consider cumulative impact

Contrary to the constant requests and submissions from local residents, the assessment largely ignores the **cumulative** impact of the PA's proposed Multi-User facility (MUF) and the proposed Hanson plant. On the contrary, the attitude of the department seems to be that the MUF's presence would somehow make Hanson's proposal more acceptable.

Over the last twelve years, during which a series of high-rise towers have been built in Jacksons Landing, only a handful of bulk carriers have visited the eastern side of Glebe Island each year. The MUF would constitute a dramatic change with 80 bulk carrier visits annually. If allowed, the Hanson proposal would add another 120 bulk carriers. The change from four or five vessels a year to 200 would be intolerable for local residents. They would be overwhelmed by the constant noise and air pollution.

Local residents have argued that the cumulative impact of the Hanson proposal on top of the MUF would be a bridge too far; the combined effect would be dire. This was seen as a strong argument against the proposal. However, the department has ignored this argument and instead contends that the MUF makes this part of Glebe Island a busy port and therefore well suited for further development. Similarly, so the argument goes, as the MUF would be a 24/7 operation, so too should the concrete plant.

Remarkably, there are effectively no controls on the PA. It can do whatever it wants at the MUF. However, that does not justify the department disregarding the cumulative impact of the Hanson proposal and using the changes to the nature of Glebe Island that the MUF would cause to effectively endorse that cumulative impact.

Lived experience

Perhaps the most frustrating aspect of the assessment is how its conclusions conflict on so many points with the lived experience of the residents of Jacksons Landing. There are three elements to this.

First, on what it classifies as “Key issues”, the assessment relies on a range of models, estimates, and predictions, usually provided by Hanson’s paid experts. Their inevitable conclusions frequently conflict with the real-life experience of locals. For example, we are told that air pollution would not be a problem, but we know that if the wind is blowing in the wrong direction, we can smell and taste the fumes from bulk carriers berthed directly opposite at Glebe Island. We are told that noise would not be a problem because we could close all our doors and windows, but we know that on the odd occasion that a bulk carrier berths on the eastern side of Glebe Island, the noise of onboard generators and ship movements can cause sleep disturbance even when we close our doors and windows.

Secondly, on what it classifies as “Other issues”, the assessment is dismissive or offers meaningless mitigation as if the issues are not material. The two obvious examples of this are lighting and property devaluation. These are major issues for many local residents because, contrary to what the assessment suggests, in many apartments the lighting on a bulk carrier directly opposite can be very intrusive, and there has been a significant impact on the value of many apartments due to the Hanson proposal.

Thirdly, the assessment identifies various monitoring and enforcement measures that would protect local communities from adverse consequences. The lived experience of

local residents tells us that such measures mean nothing. The presentation of the Balmain MP Jamie Parker was very informative on this issue. Balmain residents had to fight for years to get any kind of protection from the problems with the White Bay Cruise Terminal.

Specific problems

Noise

This is far and away the major issue for local residents. It has the capacity to literally ruin lives and make our apartments unlivable. Several points stand out.

Attenuation

The department views as “acceptable” noise exceedances from the operation of the concrete plant. This is on the basis that apartments in Jacksons Landing have noise attenuation features. However:

1. The attenuation of these apartments was specifically included to address “port” noise, not noise from a manufacturing operation like a concrete plant.
2. The attenuation is only effective with all doors and windows shut. As the concrete plant would operate 24/7, the department is saying that residents of Jacksons Landing would have to live in a permanent state of lockdown. It would follow that they would have to run their air conditioning constantly (with the attendant personal financial cost and environmental damage). It is clearly not acceptable for people to live without fresh air. The substantial windows and balconies of the apartments in Jacksons Landing make it clear that it was never anticipated that residents would have to live in permanent lockdown.
3. The department relies on the attenuation of the Jacksons Landing apartments but does nothing to require attenuation of the source of the problem, namely the concrete plant. The plant would be made of colourbond steel and would have no sound proofing. This issue has been raised with the department many times over the years. For example, back in 2018 the City of Sydney specifically advised that “This building should be fully acoustically insulated to prevent escape of offensive noise” (<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachmentRef=SSD-8544%2120190228T055414.993%20GMT>). The department’s response throughout has been to ignore this obvious mitigation method and, unsurprisingly, the assessment says nothing about it.

I find this troubling. A private business seeks to undertake a development. That development would create noise in excess of allowable limits. You would think that the obvious response of the state authorities would be to require the creator of the problem

to fix it with appropriate mitigation measures. However, in this case the department gives the private business a free pass to breach allowable noise limits and looks to local residents to fix the problem at their own personal cost in terms of significant loss of amenity and additional air conditioning expense.

Now the soundproofing issue has been raised yet again, this time by the Commission at the Public Hearing. Yet again, there is no meaningful response. If the plant were approved, as a minimum it should be required to have comprehensive sound proofing.

The Commission also raised the issue of the noise created by aggregate being dropped from the silos into metal trucks. The Commission sought clarification as to whether this would occur “inside” or “outside”. The responses received by the Commission were evasive and the position remained unclear. It is remarkable that Hanson would propose, and the department would approve, the noisy loading of aggregate into trucks outside. If the plant were approved, as a minimum such loading should be required to be done inside a soundproofed area.

It is alarming and disappointing that the department would recommend a proposal that would inflict noise exceedances on a densely populated area without including such straightforward preventative measures as soundproofing the concrete plant and requiring the loading of aggregate into trucks to occur inside a soundproofed area. Unfortunately, it is entirely consistent with the department’s underwhelming objective of securing “the best achievable noise levels **identified by the Applicant**”.

The dedicated vessel

The assessment recommends requiring Hanson to source a “quieter vessel” although “quieter” than what is not clear. The bizarre analysis on page 29 indicates that the department views a vessel causing noise exceedances of 4-5 decibels at Jacksons Landing as a “good” noise performing ship. This is a telling example of just how “permissive” the department’s assessment is. An acoustic engineer will tell you that 4-5 decibels is an enormous exceedance. What is the point of having allowable levels if they can be exceeded and to such a significant degree?

These are just numbers to the department but, with the vessel making 120 visits a year to Glebe Island, they would constitute constant sleep disturbance to many residents of Jacksons Landing and all the adverse health consequences that would accompany that. Is the department seriously suggesting that it would be impossible for Hanson to source a single vessel that would meet the relevant noise limits? The department seems reluctant to inconvenience Hanson in any way. It has no such concerns about members of the public.

If Hanson would be using a dedicated vessel, that would be a perfect opportunity to utilise ‘shore to ship’ power. This would address both noise and air pollution. I am not an expert in this area, but from what little I have read, shore to ship power is rapidly taking

off overseas. Hanson has indicated that its plant would not commence operations until 2024. By then, this form of powering vessels at berth will be much more prevalent.

The department's assessment, as on so many other issues, simply regurgitates what it was told by Hanson – “The Applicant investigated the use of shore-to-ship power for reducing ship noise but noted that none of the potential vessels can connect to this type of power supply, making it unviable.” Issues of costs were probably a factor in Hanson's investigation of the “potential vessels”. No doubt the NSW Port Authority (PA) supports Hanson on this issue because it would be reluctant to incur the expense of installing a shore to ship power supply and it would not want to set any kind of precedent that might inconvenience potential tenants of its proposed MUF.

Did the department check Hanson's assertion about shore to ship power? Will it still be correct in 2024? It appears that the department undertakes little independent analysis of some of these issues.

The department proposes that there should be no time limit on the Hanson proposal. If that were the final outcome, and the vessel was not subject to restricted operating hours, there should be a requirement to use shore to ship power no later than 2028.

Hours of operation

It is proposed that both the concrete plant and the aggregate handling facility would operate 24/7. No recognition at all would be made for one of Sydney's most densely populated residential areas just a couple of hundred meters across the water. There are many justifications given by the department. One is that the site is on a busy port that runs, and has always run, on a 24/7 basis. That is incorrect. This part of Glebe Island has had very little activity for more than a decade – just a handful of bulk carriers a year. To suggest that this proposal would constitute a continuation of 24/7 use at GI Berth 1 is absurd.

Another justification is that the PA's neighbouring MUF would operate 24/7. Two wrongs do not make a right. If anything, the presence of the MUF should make the addition of another facility operating 24/7 even less acceptable. The cumulative impact of two facilities operating around the clock would be a bridge too far.

The department also argues that the area already has significant ambient noise from the ANZAC bridge traffic. What the assessment fails to acknowledge is that the traffic noise drops away dramatically after 10pm.

Throughout the Hanson application process, many different parties have submitted that, given the proximity of the proposed development to a densely populated residential area, a nighttime curfew should apply to the operations of both the concrete plant and the aggregate handling facility, including the presence of vessels at GI Berth1. The department has ignored all these submissions.

In relation to the concrete plant, Hanson has argued that a curfew would not be financially viable given the size of Hanson's investment. In other words, Hanson could not get a sufficient return on its investment unless it operated 24/7. This is like saying that a chemical plant should be able to pour dangerous chemicals directly into the sea if the cost of treating the chemicals would render the plant uneconomic. If a facility cannot pay its way without causing environmental problems, it should not operate. If the Hanson concrete plant would not be financially viable without a reasonable curfew to prevent unacceptable noise pollution, then the answer is to not build the plant.

In relation to the aggregate handling facility and the associated vessels, Hanson has argued that it could not control the time of arrival and departure of its vessels because of weather and sea conditions. This argument is even less tenable than the return-on-investment argument. The vessel would be coming from Bass Point, just 100 kms away.

If Sydney airport can function with a nighttime curfew, it strains credulity to suggest that the Hanson facility could not.

In spite of all the submissions made on the need for a curfew, the topic is not even mentioned by the department in analysing the noise issue. The failure of the department to address this obvious mitigation measure has made many in the local community highly cynical about the department's assessment and its purported "consultation".

I understand that the Commission has made curfews a condition on other Hanson operations – <https://www.hanson.com.au/media/7040/brandy-hill-quarry-expansion-development-consent.pdf> . If the current proposal were approved, a curfew should be included as a condition.

Property devaluation

This is another issue on which the department's assessment is derisory. It concludes as follows:

The Department considers the proposal would not result in any significant impact on property values because:

o the Department's assessment demonstrates the proposal would not have any unacceptable impacts on the amenity of the surrounding area

o the proposal would continue the long-term port and employment use of the site

o the site and its surrounds are identified for future urban renewal.

The reference to no "**significant**" impact is an admission that there would be some financial loss to the residents of Jacksons Landing.

The three reasons given by the department for its assessment that the devaluation would not be significant are specious. The first is circular – there would be no significant

impact because we have concluded that there would be no “unacceptable impacts on the amenity of the surrounding area”. How can the department write those words when, in the same document, it effectively says that there would be noise exceedances 24/7 and that local residents would need to keep their doors and windows closed 24/7?

The second reason given is that the proposal would simply continue the existing use of the proposed site. That is disingenuous at best. The department knows that for more than a decade there has been no activity landside on the proposed site, and only a handful of bulk carriers a year at GI Berth 1. Most of the high-rise residential towers directly across from the site were built in that period so the hundreds of apartments in those towers have only ever been exposed to minimal activity. The Hanson proposal would constitute a dramatic change of use.

The third reason is farcical. It says that the site is “identified for future urban renewal”. If the department’s recommendation were followed this site would be “industrial” for at least the next quarter century. Is the department really suggesting that potential buyers in Jacksons Landing today would not worry about the Hanson plant producing noise and air pollution 24/7 because the plant ‘might’ be removed in 2050?

With all due respect to the department, these reasons read more like public relations spin than a balanced, evidence-based analysis of the issue.

Section 4.15(1)(b) of the Environmental Planning and Assessment Act 1979 states that the factors that a consent authority should take into account include “economic impacts in the locality”. The department’s assessment of the economic impact on local property owners is inadequate.

The decline in property values in Jacksons Landing would have a flow on effect in Pymont generally. Has the department considered the impact that this decline would have on the state’s future stamp duty revenue?

Lighting

The department underestimates the lighting issue. The photo below shows the view from our apartment. The bright lights in the center are from a vessel and onshore operations at GI Berth 7, approximately 700 meters away. It gives some indication of what the impact would be if the relevant vessel was just 200 meters away at GI Berth 1, or even less for apartments in the Evolve building, the closest building to GI Berth 1.

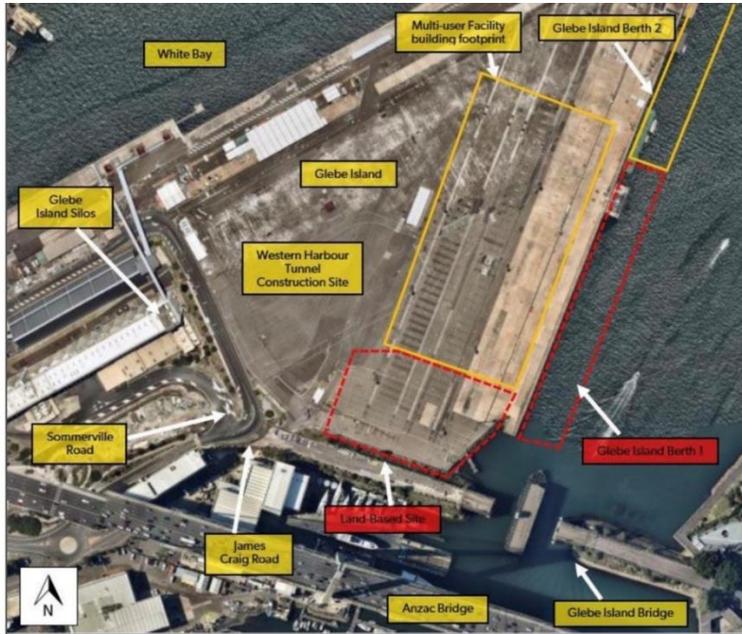


In concluding that lighting would not be a problem with the Hanson proposal, the department “notes the site has existing floodlights, and considers it sits within a well-lit context, with existing floodlights installed on adjoining sites including the ANZAC Bridge”. There are two points to note. First, some of the adjoining sites have lighting that operates on a curfew. See for example that in the photo above the Glebe Island silos are not illuminated because of a curfew. Secondly, lived experience tells local residents that the lighting from vessels is more problematic than most onshore lighting.

Water traffic

The department’s assessment concludes that the impact of the Hanson proposal on water traffic and safety would be acceptable. The department relies on its usual evidence in reaching this conclusion – “the Applicant prepared a Navigation Impact Assessment (NA), which concluded the proposal would not have adverse impacts”. And again, as usual “the Port Authority did not raise any concerns”. The latter is not surprising given that the PA (1) would derive rental income from Hanson and (2) wants to use GI Berth1 for its proposed MUF.

The department’s conclusion surprises local residents who look over the narrow and increasingly busy single-lane channel between Johnstons Bay and Blackwattle Bay and who have seen how close the Hanson vessel would have to berth to that channel. This is shown in two photos below taken from the assessment.



In spite of Hanson’s assertions, it seems inevitable that there would be problems (1) when the Hanson vessel moved in and out of GI Berth1 and (2) when some of the larger super yachts and barges did their manoeuvring to get through the narrow gap formed by the old Glebe Island bridge. If and when that bridge is rehabilitated, as a number of the department’s own plans propose, there would be serious congestion problems when the bridge was opening and closing. This is yet another issue where I question the adequacy of the department’s assessment.

Detailed version of the oral submission on visual impact presented at the Public Hearing

Introduction

The assessment concludes that “the visual impacts of the proposal are **acceptable**” and “consistent with the impacts that would be reasonably expected from development within a port”.

This is quite a leap given that even Hanson concedes that its proposal has major problems from the perspective of visual impact. The department refers to Hanson’s own “Visual Impact Assessment” (VIA). That VIA found that there would be “**high impacts** on views from the nearby infrastructure corridor (including the ANZAC Bridge and approaches)” and “**high to moderate impacts** on views from public open spaces along the foreshore”. It also found that “the impact on **the majority of individual areas of public open space** would be either **high or high to moderate**”. Locations designated as having a high impact included the Waterfront Park at Pyrmont and the Glebe Foreshore Walk.

Given the strong element of advocacy in all of Hanson’s materials, these concessions regarding the visual impact are very telling. They indicate just how bad that impact would be. It is confusing how the department gets from Hanson’s concessions to the conclusion that the visual impacts of the proposal would be “acceptable”.

There are three distinct aspects to the visual impact issue - (1) the **appearance** of the proposed plant, (2) the impact of the plant on **views toward landmarks** and heritage items, and (3) the impact of the plant on **views from landmarks** and heritage items. These need to be addressed separately.

The appearance of the plant

There is no escaping the fact that the plant would be ugly. That would be inevitable given its tangle of silos, bins, conveyor belts, and other mechanical elements. The key point is not that concrete plants are ugly but rather that they are completely unsuitable for the foreshore of Sydney harbour, one of the most beautiful harbours in the world.

The proposed Hanson site is particularly prominent and close to the heart of Sydney. It can be seen from many parts of the inner harbour region including Pyrmont, Balmain, Glebe and Barangaroo. This is acknowledged in the Hanson concessions quoted above. The site is viewed by thousands of Sydneysiders and visitors every day, from the parks and foreshore walks that surround the area, from boats on the water, and from vehicles on the ANZAC bridge.



How can it be “acceptable” to transform the above into this -



(The poor quality of Hanson’s photo montage is attributable to the fact that the original in Hanson’s Environmental Impact Statement is so small and is taken from so far away.)

Why would the department countenance allowing an industrial carbuncle to disfigure this prime harbour site for the next quarter century? It is not a sufficient answer to say that the city needs more concrete. If that is the case, build more concrete plants but in less prominent locations and with less adverse visual impact.

The department contends that “the proposal’s design and materials are consistent with the visual amenity and industrial waterfront character of Glebe Island, the harbour and

surrounding foreshores”. This is self-evidently incorrect. This part of Glebe Island has always been an open and largely empty expanse of wharf. It has never had a large-scale industrial facility like the proposed Hanson one. There is nothing about the proposal that is consistent with the current character of this part of Glebe Island.

I note that at its meeting with the department on 6 May, the Commission asked about referring the Hanson proposal to the state Design Review Panel. The response on page 14 was that “the department assessed the design of the proposal and the visual impacts of the proposal, and we considered that the proposal had acceptable impacts in that regard, and, as such, we didn’t consider it necessary to go through that level of design review”. It is not hard to imagine what the Panel would have thought about the design and visual impact of this proposal.

The department’s only answer to this proposed eyesore on Sydney harbour is a condition requiring Hanson to arrange a wall of shipping containers stacked three high for “visual screening”. This condition indicates that the department does not take the visual impact issue seriously.

Hanson has also asserted that it would mitigate the visual impact of its concrete plant with a “Landscape Plan”. In its assessment, the department states that it “supports the provision of landscaping on the site to help soften and screen the development”. This is the height of disingenuousness. Both Hanson and the department know, and have always known, that there is practically no scope to “landscape” this site. Some plants attached to a wall of shipping containers is not landscaping.

There is a jarring inconsistency between the department’s conclusion in this assessment and its Pyrmont Peninsula Place Strategy (PPPS) released last December. The PPPS advocates the completion of the foreshore walk on the “world class foreshore” and refers to the “uninterrupted foreshore promenade” as “a new global destination for Greater Sydney.” The foreshore is described as “a breathtaking waterfront promenade” and “the much-loved green and open spaces along the waterfront”. The harbour is described as “one of the world’s most treasured harbours” and the department claims that it seeks to enhance Pyrmont’s “role as an attractive waterfront tourism and entertainment district supporting the global attraction of the Sydney Harbour”. It will be “a waterfront destination showcasing the best of Sydney.”

If the department has its way, it will be a waterfront destination showcasing an ugly concrete plant for the next twenty-five years. Is that the “best of Sydney”? Is the PPPS just spin produced for a different audience? It is precisely this sort of document that has induced many people to move to Pyrmont over the years.

Views toward landmarks

The assessment refers to the requirement in the Glebe Island and White Bay Master Plan to “maintain existing views to landmarks and heritage items”. The department’s conclusion on this requirement is that “the proposal would have **no adverse view impacts** on panoramas or landmarks”. That statement is patently false. It is also inconsistent with Hanson’s own findings of high impact.

The assessment also states that “the proposal would not significantly impact on views towards the ANZAC Bridge”. But it would transform this view towards the ANZAC bridge

–



Into this view –



The department cannot possibly reconcile these photos with its statements that “the proposal would have no adverse view impacts on ... landmarks” and “**would not significantly impact on views towards the ANZAC Bridge**”. Its conclusions are indefensible. The concrete plant would have a disastrous impact on views of the iconic

ANZAC bridge. How can the department contend that this would be “acceptable”; that it would be in the “public interest”?

The ANZAC bridge looks particularly beautiful at night.



Imagine the damage that would be done to this view if there was an ugly concrete plant lit up through the night.

Again, there is an inconsistency between what the department concludes in the assessment and what it says in the PPPS. The foreword from the Minister for Planning and Public Spaces in the PPPS refers to Pyrmont’s “stellar harbour backdrop”. Elsewhere the document talks of “its stunning waterfront location”. Page 69 is more specific – “The head of the [Pyrmont] Peninsula is prominent when viewed from Anzac Bridge and **the bridge itself provides a stunning backdrop to the area**”. The Hanson plant would deface that stunning backdrop.

The inadequacy of the department’s assessment is further illustrated by comparing it with the department’s previous assessment of the Sydney City Marine developments right next door.



This photo shows buildings on both sides of the bridge. The visual impact of these earlier developments was a major consideration. All the buildings had to be below the carriageway of the ANZAC bridge so as not to obstruct views of the beautiful bridge.

The department is adopting a different approach in Hanson's case. It now seems that views of the ANZAC bridge are much less important to the department. How is that acceptable or in the public interest?

Views from landmarks

The department's analysis of this issue is particularly derisory. Hanson's photo montage of the concrete plant makes it obvious that the plant would obscure views of Sydney harbour and the city from a material section of the ANZAC bridge. However, that is not the impression given by the department's assessment.

Significantly, the assessment provides little evidence of or discussion about the loss of views from the ANZAC bridge. Rather, in yet another example of the department's selectivity, the assessment only includes a Hanson photo showing the view from one largely unaffected location on the ANZAC bridge. This is the view from the middle of the bridge looking back towards Balmain.



The only useful thing about this photo is that it shows that the concrete plant would block out views to a level above the horizon.

It is obvious that this photo is taken from a convenient and self-serving location. It is the wrong location from which to assess the impact on the key views from the bridge. Walking further to the west along the bridge, a very different picture emerges. From a significant section of the bridge to the west of where the Hanson photo was taken, the proposed silos would in fact obliterate key views of the harbour and the city.

The following photo was taken on the bridge from a position west of the Hanson photo. Needless to say, this view does not appear in any of Hanson's materials. Or the department's assessment. It shows the wonderful views that would be ruined by the Hanson silos.



Note that one of the Sydney City Marine buildings can be seen in the foreground. Those buildings were built so as not to obscure views from the ANZAC bridge.

The Hanson silos would be 80 ms long and would sit above the ANZAC Bridge carriageway. Therefore, an adverse impact on the above views would apply for a significant length of the bridge.

The views at night are equally breathtaking.



Again, note the Sydney City Marine building in the foreground.

The commissioners should go to Balmain and catch the Number 442 bus into the city. As you come onto the ANZAC bridge amazing views of the harbour and the city open up. Views to Balmain, and then across to North Sydney, Johnstons Bay, the Harbour Bridge, Barangaroo, and the CBD.

Or go to Five Dock and catch the 437 over the bridge into the city. Or the 501 from Paramatta; the 500 from Rozelle; the 506 from Hunters Hill; the 508 from Drummoyne;

and many others. Everyday hundreds of buses carry thousands of people across that bridge. There are tens of thousands of cars as well. 140,000 vehicles use the bridge every day, plus many cyclists and pedestrians, all enjoying the fantastic views on their journey across the bridge.

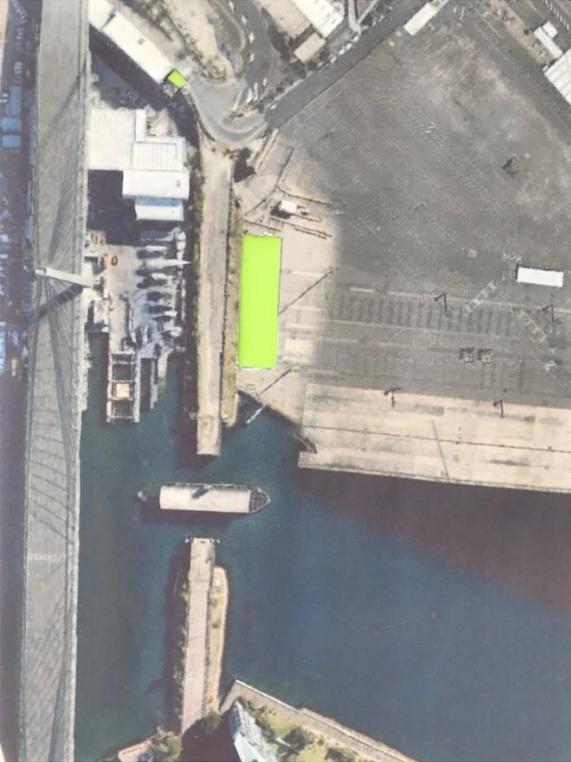
This proposal would block fantastic city and harbour views currently enjoyed from the bridge by tens of thousands of people every day. How exactly does the department conclude that that would be acceptable? That that would be in the public interest?

Once again, it is revealing to examine how the issue of views from the ANZAC bridge was considered by the department in the context of the Sydney City Marine development. A modification to that development was assessed in 2015. It involved the building of a rectangular “light box” just 3m high and **4.7m wide**. The height of the proposed lightbox was less than the height of the carriageway on the ANZAC Bridge.

The application contained a discussion of the visual impact issue and the scenic value of the views of "the Sydney CBD and Sydney Harbour Bridge across White Bay. The importance of the visual impact issue in 2015 is evident from the Environmental Assessment Report prepared by the department. Relevant considerations were that the light box would not contravene the requirement that “built form must not present a wall of development to the public domain” and must “maintain existing views to landmarks”.

There is a great deal of analysis for a structure measuring just **4.7m wide** and sitting **below** the level of the ANZAC bridge carriageway. Contrast this with the department’s apparent lack of interest in the loss of views that would be caused by Hanson’s proposed 80 m long silos.

The following picture highlights the vast difference between the department’s attitude to the light box modification and its attitude to the Hanson application.



At the top left there is a tiny green box showing the 4m wide light box. Compare that with the vast Hanson silos.

Something does not add up here. Why has the department not undertaken a detailed analysis of the impact of the proposed Hanson silos on views from the ANZAC bridge?

There is a clear inconsistency between the department's approach to the light box modification and its approach to the Hanson proposal. The assessment contains little analysis apart from Hanson's self-serving photo montage taken from a location on the bridge where only views to Balmain would be affected.

The final conclusion in the department's assessment is that

“views from the ANZAC Bridge would be acceptable as:

views from the bridge would be transient and constantly changing as viewers move along the Bridge

due to the height of the Bridge, views of the broader precinct would still be maintained

the existing views contain similar and more dominant features including the Glebe Island silos.”

This conclusion warrants close analysis. The first argument is that “views from the bridge would be transient and constantly changing as viewers move along the Bridge”. What exactly does that mean? That it would not matter that there would be major view

obstructions because a viewer could always move to a different part of the bridge? That argument does not bear scrutiny.

The second argument is that “due to the height of the Bridge, views of the broader precinct would still be maintained”. Again, what does that mean? The photo in the assessment of the view towards Balmain clearly shows that the silos would be so high that they would block out the view to a level well above the horizon. The height of the Hanson silos relative to the height of the bridge carriageway would mean that, on a significant section of the bridge, when a viewer looked in the direction of the silos they would not see “the broader precinct”.

The third, and most absurd, argument is that “the existing views contain similar and more dominant features including the Glebe Island silos”. The view below is an “existing view” but it does not contain “similar and more dominant features including the Glebe Island silos”.



This argument is meaningless nonsense. It is yet another example of how the department constantly seeks to use the Glebe Island silos to justify problems associated with the Hanson proposal.

These three arguments read like a feeble attempt to justify the unjustifiable. They smack of advocacy rather than assessment.

Conclusion

The above review of the appearance of the proposed plant and the plant’s impact on views to and from major landmarks reveals the total inadequacy of the department’s assessment of the visual impact issue. It negates the department’s assertions that the concrete plant’s visual impact would be acceptable and that the plant would be in the public interest.