

Jacksons Landing Coalition Incorporated (JCLI)

Submission to the Independent Planning Commission (IPC)

Glebe Island Concrete Batching Plant and Aggregate Handling Facility SSD 8544

JCLI wishes to thank the Commission for the opportunity to respond to further correspondence from the Department of Planning, Industry and Environment (DPIE) and the applicant/Hanson.

The Department of Planning, Industry and Environment (DPIE)

JCLI considers the DPIE has fostered an indulgent and protective attitude towards Hanson such that the applicant believes it can continually change its plans.

We would like to suggest, that on any objective reading of the DPIE's responses, one would be bemused by the conditional and deliberately vague language used by the DPIE. Terms such as "where possible", "greatest extent possible", "appropriately mitigated and managed", "best achievable noise levels for the proposal", "2040 and beyond" speak to DPIE passivity and not as a robust defender of best practice of urban planning and renewal nor acting in the "public interest".

This is profoundly disappointing. The DPIE had no such issues with recommending non approval of the recent Star City proposal citing many of the reasons we find that relate to SSD 8544.

Hanson

The applicant is a concrete manufacturing business headquartered in Heidelberg, Germany where if one conducts a Google maps satellite view of Heidelberg, you won't find a concrete batching plant within spitting distance of any densely populated area on the Neckar River. Also of note is that since the takeover of Hanson by Heidelberg Cement, Australians are deprived of any avenue for shareholder action as to its conduct, thus placing more emphasis on the need for Government departments such as DPIE to protect our interests.

JCLI's response to the latest correspondence is to question what seem to be an unending number of amendments being sought by the applicant at this late stage in the assessment review process.

Hanson's answers to IPC "Questions on notice" prepared by Ethos Urban contain some relevant omissions and what could only be described as statements which don't quite tell the whole story.

For example "*Hanson intends to deliver aggregates from Bass Point to Glebe Island by ship*".

This we argue has a different meaning to Hanson "will deliver". Good intentions are merely that and it might be difficult for the IPC to place conditions on intentions. Not mentioned in the Hanson document is the fact that the Bass Point terminal has remained inactive for the last 10 years and will require a substantial overhaul and refit to bring it to operational capability. A figure of \$15M has been mentioned to achieve this. Discussions with locals have confirmed the state of disrepair and the following photo clearly shows the dilapidated and run down aggregates loader at Bass Point.



Courtesy of Michael McFadyen

http://www.michaelmcfadyenscuba.info/viewpage.php?page_id=132

We highlight this as an example of where the applicant is not providing the IPC with the full picture.

Which brings us to point 5. Hanson's Additional Comments para b) as quoted here:

b) Amendment to Condition F3(a) of the Recommended Development Consent

"As per the Environmental Impact Statement by Ethos Urban 14 March 2018 (page 11), Hanson proposes to deliver 1,000,000 million tonnes of aggregates by ship. It is therefore requested that Condition F3(a) of the recommended development consent be amended to state "The operation of this use is restricted to a maximum of: delivery of 1,000,000 million tonnes of concrete aggregates per annum by ship".

Apart from the 1,000,000 million actually being a trillion, this statement places a restriction on the amount of aggregate that can be delivered by ship. Intentionally or unintentionally it does not condition the usage to the delivery being only by ship.

Clearly Hanson cannot operationally rely totally on shipping given the huge concentration of aggregate delivery to Glebe Island. If for any reason a ship is unable to deliver to Glebe Island then Hanson's Glebe Island operations potentially grind to a halt. It therefore seems disingenuous to imply that all aggregate will be delivered by ship from Bass Point.

Again we urge the IPC to either reject the Hanson application outright, or if you do provide approval, ensure there are stringent enforceable conditions of consent which include: -

1. A curfew against operations between 9 p.m. and 7 a.m., with an insistence that ships berthed at G1 and G2 and their attendant tugs not breach noise limits at any time during daytime operations or the nighttime curfew
2. A limit on the number of trucks which can enter or leave the Hanson plant in any 24-hour period
3. Strict adherence to current EPA levels for factory noise, dust pollution, air pollution, or any other conditions imposed by NSW State law.

In conclusion the Jacksons Landing Coalition wishes to thank the IPC and Commissioners Tuor and Williams for their pursuit of the facts pertaining to this application. JCLI considers it is now obvious, that under sustained questioning by the Commission, the original EIS was poorly researched and drafted, as JCLI has continued to point out.