

WRITTEN SUBMISSION TO the IPC

proposed Hanson Construction Materials Pty Ltd Concrete Batching and Aggregate Handling Plant at Berth 1, Glebe Island SSD 8544

Dear IPC Commissioners

Thank you for the opportunity to speak at the recent public meeting and for inviting me to lodge my verbal submission by email. I would like to do this by using the unedited version of my verbal submission and add some more in-depth material to my arguments against the application and the DPIE assessment.

I have also added, as an appendix:

- 1) my objection of January 2020 to Hanson's Response to Submissions for reasons which contains more detailed analysis of the defects in and unsuitability of the proposal.
- 2) My original analysis and objection to Hanson's EIS

INTRODUCTION

My name is Peter Ball. I'm an architect and I live in Jacksons Landing, opposite the eastern side of Glebe Island and the proposed **location** of the Hanson Concrete Batching Plant.

My wife and I moved here in 2015, having been **inspired** by the Bays Precinct Transformation Plan, which promised urban renewal and world-class destinations for the Glebe island and White Bay Precinct

We, like many others in this community, wanted to be part of this grand vision for Sydney.

At the time, **Mike Baird** announced that "*The industrial relic of the White Bay Power Station and surrounds will be transformed into a global centre for high-tech jobs and innovation. Glebe Island will transition from importing sand to exporting silicon*".

An extract from the DOP&E website at the time states that *The NSW Government's ambition for The Bays Precinct is to drive an internationally competitive economy, by building **world-class destinations** on Sydney Harbour that will **transform** the city, New South Wales and Australia*"

Sadly, the **current** DPIE now seems to believe that an industrial conglomerate that imports bulk materials and distributes cement, concrete, aggregate and, **who knows what else**, around the clock every day of the year constitutes a world class destination.

Approval of the Hanson proposal would be the death knell to our expectations, our right to healthy and peaceful enjoyment of our home and environment, and the visions of the Transformation Plan.

The Port Authority's self-serving and self-approved MUF and Cement Australia's current proposal to double its cement distribution to 1.2million tonnes per annum **is now to be accumulated** by the Hanson proposal to create an intensified industrial conglomerate which would dominate Glebe island and render it unfit for urban transformation..

This behemoth is scaled to add 1m cubic metres of concrete and 1m tons of aggregate per annum to the materials to be trucked out of Glebe Island.

Millions of tonnes, hundreds of thousands of trucks!

A level of industrial intensification the scale of which none of us have never seen before in this part of Sydney.

Is this really what we want in Sydney Harbour, in an area which has transitioned from industry to one of the densest residential areas in Australia?

I am sure it is not.

In this submission, I'd like to discuss the **flawed, chaotic, and disingenuous planning process** that appears to reverse-engineer a predetermined assessment by the DPIE in favour of the applicant for reasons not fully disclosed to the public.

Then justifies it with the absurd and condescending conclusion that this is in the public interest.

A conclusion as unfortunate as the recent media suggestion attributed to the Minister for Planning that a public park could be built above the 12 storey-high concrete plant to achieve desired pedestrian connections – clearly a glib throwaway line! If this was honestly part of the overall plan for Glebe Island, the concrete plant should be architecturally and structurally designed so that such overhead public space was an integral part of overall building design.

The Transformation Plan is an excellent collection of visions and objectives for the entire Bays Precinct. It met with enthusiasm and widespread acclaim when released in 2015.

This visionary plan demanded a **competent** planning response, commencing with the preparation of an overall **Bays Precinct Master Plan**, to protect, enable, and coordinate these visions and objectives.

Had this happened, it is likely that the character and scale of industrialization represented by the Hanson concrete plant and its neighbours would have been ruled out from the start, as being **inappropriate for this site**. As indeed they are.

But, regrettably, the Planning Department chose to allow delayed and piecemeal master-planning of **parts** of the Bays Precinct, headlined by the new Sydney Fish Market. I believe anyone who knows about planning would have anticipated the pitfalls in this approach, which we are seeing now.

The vacuum created by this delayed and piecemeal approach has led to opportunistic commercial development proposals which now threaten to prevent the Transformation Plan's objectives.

The latest being the Hanson project, which is somehow allowed to occupy prime waterfront that belongs to the people of NSW for no valid reason and without having to participate in any public tender. Because it departs from the Transformation Plan by promoting intensive industrial usage, this site should have been subjected to a rezoning process to involve the public prior to any proposal being considered, if we are to have any faith in our planning system. Thereafter any proposal should have been required to meet high-quality design standards.

PLANNING ISSUES

The Hanson proposal does not even comply with the relevant planning documents without a massive stretch of the imagination or an equal dose of political "spin":

I refer to
the **GLEBE ISLAND & WHITE BAY MASTER PLAN 2000**,
the **BAYS PRECINCT TRANSFORMATION PLAN 2015**,
the **BLACKWATTLE BAY PRECINCT PLAN** currently in an advanced stage of preparation and
the recently released draft **BAYS WEST STRATEGY**....

Hanson states repeatedly in its EIS that it complies with the first 2. I would like to tell you why this is not true.

the **GLEBE ISLAND & WHITE BAY MASTER PLAN** is the current master plan for the Bays West precinct.

In the absence of any revisions to that plan, its principles and controls should govern what can and cannot take place. Yet they appear to have been cast aside in both the proposal and its assessment.

Please consider the following:

This plan's principles include:

- **improvement in the overall appearance** of the port,
- provision of a framework to ensure that development within the Port achieves **a high standard of urban design**,
- and urban design principles which recognise the location of the Port adjacent to residential areas.....with **particular attention to the physical provision of noise control measures**.

On the subject of location, this plan provides two building zones – one for buildings of up to 10,000sqm in floor area and 12m maximum height and one for a 6-7 level parking structure of up to 25m maximum height.

Nothing over 25m! So, why does the DPIE considers 34m high structures to be appropriate, without any respect to the population's overwhelming objection to both location and size?

The zones identified in the Plan do **not occur along the wharf** or near either the Anzac Bridge or the old Glebe Island bridge. They are in more **internal positions** in accordance with the plan's objectives to maintain existing views of major landmarks and to respect urban context.

These zones do not **permit** the proposed location of this concrete plant. Nevertheless, despite massive community objection, the DPIE supports non-compliance with the Plan.

Clearly the intent of the master plan is to avoid placement of large structures along the waterfront or too close to landmarks so that they do not conflict with them or block views of them..... a common concern in the objections to Hanson's EIS.

The fact is this is not acceptable to the majority of the surrounding population. The questions are, why is this acceptable to the DPIE? Is it acceptable to the IPC?

The Hanson proposal has a site area of 2 1/2 football fields and a height of 34m. It is a clumsy-looking industrial eyesore clad in steel siding and "decorative" container terminals, designed by an engineer – if designed at all.

But the Plan's objective is for high-quality urban design! Therefore, the concrete plant, if approved, **must carry the condition** that it is designed by an **architect of high quality** – ideally through the vehicle of a design competition. This condition would surely be required in the design of any other building that was permitted on a site as sensitive as this. Such a condition would **respond to** the objectives of this Plan, as well as the Transformation Plan.

It does not comply with this master plan on the issues of location, height, and scale. Clearly, it also ignores both the spirit and provisions of the plan in terms of urban design.

Nor is it **consistent** with the existing working harbour character of the area.

For many years the character of the Johnstons Bay side of Glebe Island has been established through small-scale maritime operations plus occasional ship berthing. Primarily, it has become an increasingly busy waterway servicing Rozelle Bay. There is no precedent in **this character** for large-scale industrialised facilities along this side of Glebe Island, despite claims to the contrary by Hanson and its apparent sponsor.

Do we really want tourists and commuters using the ferry service that is part of the new Fish Market proposal passing within metres of a gigantic industrial facility?

The proposal does not comply on scale, character or locational issues.

On the subject of noise, the master plan states an upper limit of 40dBA within nearby bedrooms for continuous, steady or quasi-steady noise, beyond which sleep arousal disorders could occur.

This type of noise equates to that generated by ships at berth as well as other noises likely to be generated by the proposed plant, for example trucks and aggregate loading.

But **historical ship noise has already been measured at much higher levels**, on several occasions. Many of us have already experienced the effect this has on sleep and health, as you would have heard from others in the public meeting.

Both the DPIE assessment and the accompanying peer noise review acknowledge that plant-generated night-time noise levels would be well above both EPA limits and those prescribed in the current master plan..... But then choose to ignore this issue.

The proposal does not comply on noise issues.

I have a few further points to make about the abandonment of this master plan in my section dealing with the DPIE assessment.

In summary, had a proper and impartial planning process been followed in the Hanson assessment - involving due respect to the GLEBE ISLAND & WHITE BAY MASTER PLAN, the application would have been refused for non-compliance.

In relation to the TRANSFORMATION PLAN and its objectives:

Glebe island was declared a State Significant Site after the release of the Transformation Plan, to ensure that all future development in the Bays West would comply with the plan's principles.

24/7 Industrial intensification over more than half of the overall site area and most of the waterfront **clearly does not!**

The creation of such large-scale industrialisation of Glebe Island and the conversion of its **entire perimeter** to a deep-water port is a **gross distortion** of the Plan's objective to support a degree of maritime-related activity within an urbanised mixed-use precinct.

Another objective of this Plan is to establish a new pedestrian-friendly mixed-use precinct anchored by a White Bay Power Station commercial and transport hub."

But the **disruption caused by thousands of truck movements per day** and the high-impact noise level and toxic output of the adjacent concrete plant would render this objective unachievable or, at best, unreasonably compromised.

And Hanson's dominating presence as part of a long-term industrial conglomeration spreading over Glebe Island and White Bay would **destroy the objective of creating a world-class destination**.

The Transformation Plan refers to a post-2022 timeframe for commencement of works that reflect its visions.

2022 is next year.

This timeframe clearly implies that - post-2022 - any development on Glebe Island must be in accordance with the visions and objectives of this Plan..... Not post 2040, 2050, or **some other** future date to be arranged between Hanson & The Port Authority at their convenience.

Clearly the Hanson proposal **is far too late** for The Bays!

But the DPIE assessment appears to **promote the project** by enabling long-term occupancy and commercial viability to the detriment of the Plan and the population's **reasonable expectations that it be executed in good faith and in good time.**

The DPIE's conditions **carry no limit at all** on the duration of Hanson's occupancy, leaving it up to the lessor to control this through the lease agreement. But the PA is clearly "empire-building" at Glebe Island and would arguably not be interested in doing this. In any case, the lease would be in place for at least 20 years and would stifle any attempts to achieve meaningful urban renewal for over 2 decades – being time taken for detailed design, construction and commissioning plus a 20-year lease. And who could effectively control whether the lease had an option to renew?

Is this what the DPIE assessment claims to be in the public interest? Are we seriously supposed to be interested in a minimum 20-25-year delay to the transformation, whilst we choke on 24/7 industrial output?

Intensified heavy port- and industrial usages are **both** retrograde and completely unjustifiable in this context – **whatever the timeframe of the transition.**

I submit that the proposed development is clearly not in keeping with the objectives and visions for the Glebe Island Destination in the Bays Precinct Transformation Plan and should be rejected as an inappropriate, disruptive and dangerous usage of **this** State Significant Site.

Turning to the **BLACKWATTLE BAY PRECINCT PLAN**

This plan includes the new Sydney Fish Market and the proposed large-scale urban renewal along the Bank Street strip which connects the existing Fish Market site to the Glebe Island Bridge.

This plan includes a strong physical link between the proposed White Bay metro station and the new Blackwattle Bay Precinct via a reconstructed bridge and public promenade to the station and beyond. A link of great importance!

This link is to encourage pedestrians, cyclists, and small public transport vehicles to access the Blackwattle Bay Precinct and the new Fish Market.....consistent with the Transformation Plan's goals to create pedestrian connectivity **throughout the Bays Precinct.**

The trouble is, the metro will be located **on the other side of the Cement Australia Silos** and such public access would have to occur directly alongside one of the **world's largest concrete plants** and **through** the Cement Australia site.

And then run the gauntlet of the thousands of heavy trucks per day which will be entering and leaving Glebe Island to service these facilities.

In this context, the scale, location, noise, and heavy-traffic output of Hanson's proposal would create an unacceptable environment and an impenetrable barrier to this connectivity between precincts.

And an **unacceptable barrier to the objectives** of the Blackwattle Bay Precinct Plan.

The draft BAYS WEST PLACE STRATEGY

The March 22 release of the Bays West Strategic Plan (BWSP) and the subsequent DPIE approval of the Hanson concrete plant proposal further illustrates the disarray in the NSW planning system.

This so-called strategy for 2040 and beyond **includes the Hanson concrete plant** - despite the fact that its assessment by the DPIE **had not yet been concluded** and the process of determination by

the IPC **had not even commenced** at the time of release. I wonder how the IPC feels about this apparently pre-emptive decision....and the assumption that the application will be approved. The community is outraged by it.

This appallingly careless mistiming **undermines public confidence in the planning process** and arouses suspicions in relation to the concrete plant on Bank Street owned and operated by HYMIX (a subsidiary of Hanson)..... A plant which forms part of the amalgamation of land along Bank Street for the Government to sell to developers for high-density development.

Has a “behind-closed-doors” arrangement been made with a powerful and influential international company to facilitate the construction of the new Fish Market and free up the Bank Street strip for redevelopment, with a waterfront site and 24/7 concrete-making the reward?

Many people in this community are asking this question, having completely lost faith in the possibility of a fair and reasonable assessment by the DPIE.

The Bays West Place Strategy shows the area occupied by the concrete plant reverting to public usage by 2040, despite the lack of any condition in the DPIE assessment to ensure that can happen.

Where is the protection required to enable future public usage of that land and progression of the Transformation Plan?

And how is it in the public interest to wait another 20+ years for this to happen.

This Strategy also highlights public access between Pyrmont and Balmain as a key component but then chooses to make it highly unlikely. It attempts to “placate the audience” by suggesting that, somehow, a public park could be developed some 40m above Glebe island over the top of the concrete plant, without any requirements for **a design solution before the plant is built**. This is not a strategy. It’s an insult to the intelligence of the community.

I would like to turn to the DPIE ASSESSMENT

1)..80% of 225 submissions on the EIS were objections. 11% were in support, of which many live outside the area. After the Response to Submissions the percentages were even more damning at 86 objections in 93 submissions. I received no acknowledgement of the issues raised in my objection (see appendix) either in person or in terms of the subsequent assessment. Yet I believe that the majority of the points I raised were factual.

They were also shared by my community, authorities, and local politicians

And now, 4 years after the EIS submission, we get an assessment that reads like a rehash of all the unsubstantiated claims in Hanson’s EIS and subsequent RtS. It lacks significant objectivity and looks as if it could have been written by the proponent.

2)..Both the EIS and the assessment **appear** to have been written with the objective of watering down both the current planning instruments and most of the significant negative impacts of the proposal.

If this were the case, it would represent a complete abrogation of social responsibility.so that a desired **predetermined** recommendation can be justified.

I would like to provide an example of the above observation:

In the transcript of the May 6 meeting between the DPIE and the IPC (p7&8), there is discussion about the Glebe Island & White Bay Master Plan 2000 in which the DPIE seems to do its best to obfuscate and confuse the IPC commissioners. It actually appears to confuse itself in its clumsy attempts to get around the urban design implications in this Plan, deciding in the end to take the question on notice.

It seems to liken the Master Plan to a DCP. If this is a Development Control Plan, I cannot see how this would render the Master Plan as being any less prescriptive or specific. But, in a clever piece of legislative juggling, the DPIE states that “DCPs don’t apply to SSD, pursuant to clause 11 of the State and Regional Set. And clause 11 of the State and Regional Set we believe overrides clause 40.”

It then has the gall to state “But despite this view, and for completeness, the department nevertheless considered the Glebe Island 25 White Bay masterplan in appendix C of its report” Clearly it has not done this in any other way than tokenistic, as the proposal simply does not comply at all with the Master Plan whether you try to confuse its relevance or not. And why should the assessing agency be attempting to favour the application by trying to confuse the IPC?.

3)..The Hanson EIS is misleading and disingenuous. It ignores the real environmental impacts, which would be totally unacceptable..... and totally **unmanageable**. The DPIE assessment is equally so!

Please consider the following statement in the assessment, under the heading “Need and justification”:
“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).”

However, when the IPC discussed the matter with Hanson, their Development Manager said:

“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.”

Hanson also made a submission on the draft Pyrmont Peninsula Place Strategy showing that they intend to maintain the Hymix plant.

I do not know how the IPC will interpret this but it would seem that there could not be a clearer contradiction. One could conclude that the primary justification for the plant does not even exist. The assessment is factually and fundamentally incorrect.

The question also needs to be asked: What are the penalties for false statements by public officials in the application process?

4)..The assessment process has also been characterized by a clear detachment from both the urban renewal objectives of the Transformation Plan and the democratic principle of honest engagement with the public.

it has excluded public debate to the best of its ability. Action groups have tried to stimulate objective discussions and proper review but have been stymied every step of the way by Government intransigence and singlemindedness. Its always been as if the decision had already been made in favour of Hanson.

The process has lacked transparency and shown little respect for existing planning instruments.

5)..The assessment has not placed any time limit for the duration of the concrete plant, despite the high-level of public objection and its obvious inconsistency with the progressive plans for The Bays.

It seeks to push out the timeframe for transformation to justify this and carefully avoids reference to the Bays Transformation Plan timeframe for the Glebe Island Destination, beginning post 2022. It arbitrarily prefers to use the Bays West Strategy – which is not even a plan – to delay such urban transformation

by 20 years without any respect for the public. This is a poorly constructed and contradictory document, apparently conceived in haste, and dumped on the public in advance of the assessment!

I refer to the following extract from the transcript of the May 6 meeting between the DPIE and the IPC (p7)

There was no time restriction on the approval. And we also - duration of use was something that was considered by ourselves in the assessment. The applicant did not seek a time limited approval as part of the - its operations, and we didn't impose a time limited approval. I think the thing to highlight here is that there's no definitive 30 timeframe that would allow us to say, okay, this is the point at which these uses will cease, because there is a lot of strategic work that needs to be done in - you know, in consultation with multiple government agencies and the community. So we don't have a deadline date there. And so we just considered the application on its merits.

The DPIE gives the vague and suspicious reason that the applicant did not seek a time-limited approval. I ask you, why would any commercial applicant seek to limit the duration of its own proposal? And why would a DPIE assessment not place limits anyway, in the public interest?

In my view, it is reasonable to suggest that an explanation for this lack of objectivity and professionalism is that a favourable arrangement with Hanson had been agreed on at senior governmental level prior to completion of the assessment. There are many in this community who are suggesting just that.

And to suggest that the application was just considered on its merits is hogwash. I would suggest that any careful and professional analysis of the merits of this application would have resulted in the pros and cons being in line with the percentages in the submissions on the EIS and RtS. That is, merits about 15%, demerits about 85%. Therefore, a negative recommendation.

6)..The assessment has continually accepted outdated predicted data in preference to available measured data in an apparent tactic to water down the community's environmental concerns.

The assessment process culminates in a positive recommendation, with the glib conclusion that the Hanson proposal should be approved in the public interest.....

When clearly **it is not!**

IN SUMMARY

The proposal is for a gigantic concrete plant and aggregate distribution facility, involving thousands of truck movements per day. It consists of an enormous metal shed with ugly conical caps on silos, which would block views to and from the Anzac Bridge. It has no architectural design quality at all and would be a visual blight on the landscape for decades to come. An ugly, archaic relic!

It is to be located in a gridlocked area for which massive amounts of public money is being spent to improve traffic flow. It proposes to operate on a 24/7 area in a high-density residential zone without regard for demonstrable adverse environmental and health impacts. It tries to pretend that there will be no significant traffic impacts.

Cumulative environmental effects, involving the 2 other large-scale bulk materials facilities at Glebe island - have never been properly studied. This is careless disregard for the public interest. The proponent and the DPIE appear to have engaged in a deliberate attempt to understate these.

It would be extremely detrimental to all other parties in its vicinity and quite destructive of the visionary objectives for Glebe Island, which met with widespread public acclaim when launched in 2015 and which now need to be promoted and developed in accordance with the Plan's timeframe.

The State Significant Site chosen is not appropriate for this development as it does not align with the visions for the future in any of the relevant planning instruments and represents a reckless waste of public land. In fact, it will sabotage these visions.

It is an enormously valuable site, both monetarily and socially. it **cannot be handed to an industrial crony** without a public process involving appropriateness and competitive tendering and without arousing deep public suspicion over the process.

Nor does it respect the spirit, guidelines and principles in those instruments.

The proposal has no social merit in terms of the public interest as evidenced by the overwhelming proportion of public submissions against both the Hanson application and the subsequent Response to Submissions.

It carries significant environmental and social risk.

It would impact substantially on the health and well-being of surrounding communities.

Its support by the DPIE through a deficient planning process and a low-quality, apparently biased assessment, is viewed as a breach of faith to the people and a failure of due process.

I believe the IPC decision on the application marks a **watershed** in the transformation future of the Bays West and I call on the Independent Planning Commission to refuse this application in the interest of the public and the successful transformation of the bays Precinct.

Yours Faithfully.

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APPENDIX 1

Response to HANSON RtS

Dear Sir

As an owner of and resident at the above address, I am writing in relation to the Response to Submissions (the RtS) dated 11 December 2019 prepared by Ethos Urban on behalf of Hanson Construction Materials Pty Ltd (Hanson). The purpose of this letter is to reiterate my strong opposition to this proposal, which would stand within 200-250 metres of my home, and to state how totally inadequate the RtS is in addressing both the concerns of the 194 objecting submissions, the matters raised by the DPI&E itself and the promised transformation of the Bays Precinct.

GLEBE ISLAND - CONTEXT – THE BAYS PRECINCT TRANSFORMATION PLAN (BPTP)

To reiterate some comments I made in my written objection of 2018 when the proposal was submitted for assessment, the then Premier of NSW, Mike Baird, said (in his Bradfield Oration of 2015/6) *"The industrial relic of the White Bay Power Station and surrounds will be transformed into a global centre for high-tech jobs and innovation. Glebe Island will transition from importing sand to exporting silicon"*.....Furthermore, an extract from the

DOP&E website at the time states that. *"The NSW Government's ambition for The Bays Precinct is to drive an internationally competitive economy, by building world-class destinations on Sydney Harbour that will transform the city, New South Wales and Australia"*

As well as announcing the gradual transformation of the port/industrial nature of Glebe Island/White Bay to a technological, innovative hub, the state and federal government have invested significant funds over the past 2 decades in driving the urban renewal of the Pyrmont area, particularly under the Federal Government's Building Better Cities program in the early 1990's.

This move towards more urban and tourism-focused directions is now in jeopardy through proposed renewed industrial activity such as the Hanson Concrete Plant and the adjacent MUF. These facilities are not compatible with the quality of life, health and wellbeing of the residents who have been encouraged to move into the area. Many, my family included, decided to move into Pyrmont as a result of this investment and forward vision, and by assertions for the future made by the NSW State Government, through Urban Growth NSW and other bodies. I, like many others, was impressed by the vision for eight "stunning" waterfront destinations, including Glebe Island, which were targeted for world-class transformation.

Clearly, this current proposal (and that of its neighbour – the Port Authority's Multi User Facility) sits in direct opposition to the goals outlined for the area through the Bays Precinct Transformation Plan and is therefore not only extremely disappointing but also inappropriate and unacceptable from a planning viewpoint.

The suburb of Pyrmont is now the most densely populated in Sydney (Australia?). What were once decrepit and polluted industrial zones are part of an ongoing redevelopment comprising multi-unit housing and the population of the surrounding area has not just increased in density but improved in architectural quality and swung to more

appropriate urban uses in line with state and federal government policy. A return to increased heavy industry would clearly represent an unwanted regression in this process of urban renewal and would create significant adverse impacts on the health and wellbeing of residents.

Against this context of successful urban renewal, we now see an ambitious and opportunistic attempt - which includes the NSW Port Authority's totally unacceptable decision to approve its own application based on a flawed and flimsy REF - to reindustrialise Glebe island and to establish a deep-water port on an around-the-clock basis. In a narrow bay that has now become both an active marine thoroughfare and part of the "lungs" and outdoor activity space of new urban residential development, the Port Authority, together with its tenant Hanson, expects to develop large-scale industrial facilities, without any respect for its urban context or the environmental consequences attached. This proposed Hanson development - completely lacking in aesthetic quality, sensitivity of scale, and appropriateness of location - with its 34-metre-high silos and massive footprint, would obstruct views of significant landmarks and dominate the bay. It represents a complete affront to the objective of developing tourism and modern urban alternative uses for the Bays Precinct.

Apart from a serious erosion of the peace, health, and amenity enjoyed by Pyrmont residents, this regressive move towards additional heavy industrial uses in the Sydney harbour region would also jeopardise the area's attractiveness for cruise ships, and thereby diminish the value of this growing element of the global tourism industry.

Hanson's RtS response to The Bays Precinct Transformation Plan for Glebe Island

The RtS devotes considerable text to addressing the Bays Precinct Transformation Plan (the BPTP). Hanson's responses to some of the principles of the BPTP are, in my view, both surprising and disingenuous. They illustrate both the inconsistency of the Hanson project with the BPTP and the contortions Hanson will go to in its attempt to justify the unjustifiable. For example:

BPTP Principle – *"Build on the unique history of The Bays Precinct."*

Hanson response – *“The proposed development will build on the history of The Bays Precinct by allowing an existing port facility to remain in use”.*

Are we to believe that escalating noise and visual pollution to new highs, obscuring heritage items (Silos and Anzac Bridge) with a massive and unsightly industrial monolith and drastically reducing air quality in the area was what the drafters of the BPTP had in mind when they talked of building on “the unique history of the Bays Precinct”?

BPTP Principle – “Establish a powerful and enduring governance model based on whole-of- government collaboration that fearlessly pursues public benefit.”

Hanson response – *“This principle is not relevant to any specific development application.”*

On the contrary, I believe that Hanson, and the PA, are fearlessly pursuing self-interest and destroying public benefit at the expense of public interest, health and safety.

BPTP Principle – “Be transparent and communicate the issues and challenges we face and the investments needed to realise the Precinct’s potential.”

Hanson response – *“This principle is not relevant to any specific development application.”*

Clearly, a gigantic, toxic concrete plant does nothing to “realise the Precinct’s potential” which, equally clearly lies in the direction of urban renewal and public amenity. In fact, Hanson’s investment would be directed at private profit at the expense of public amenity and approval of this application would be a highly regressive step, one which would set the area back for the next twenty years and.

BPTP Principle – “Allow the time to invest in genuine and early engagement with, and broad acceptance of our plans from, all categories of the public, government and industry.”

Hanson response – *“The proposed development is consistent with this principle as it will allow the site to be utilised on an interim basis until the Government determines that the site should no longer be zoned for industrial purposes and the future use of the area is determined.”*

Hanson’s suggestion that its plans have broad acceptance from the public in the face of two hundred opposing submissions is farcical. Worth noting here is the fact that the only submissions that did not object to the proposal (around 20) were those from people who were affiliated with Hanson and lived out of the area (ring-ins). It is also completely disingenuous of Hanson to describe its open ended twenty-plus-year industrial plant as utilisation on “an interim basis”. Buried in its earlier EIS is the comment that it sees its facility as being complementary to and compatible with the future transformation of the BPTP for many more years beyond. **Surely the BPTP and resulting classification of the land as State Significant already demonstrates that the Government has determined that the site should no longer be zoned for industrial purposes.**

BPTP Principle – “Unlock public access to the Harbour’s edge and waterways along the entire coastline.”

Hanson response – *“Although the proposed development will prevent public access to this part of the foreshore, this is consistent with both the existing situation, and other working harbours.”*

In fact, this project would lock the public out of foreshore access for decades, which completely contravenes the stated goal of unlocking public access to the Harbour’s edge, one of the greatest features of harbourside planning in Sydney in recent decades and one of the main objectives of the BPTP. This must not be allowed to happen under any circumstances.

BPTP Principle – “Prioritise planning for public spaces, White Bay Power Station and Sydney Fish Market.”

Hanson response – *“The proposed development is not inconsistent with this principle.”*

This is clearly untrue; **the proposed development is of course inconsistent with this principle** by prioritising planning for **private** spaces and locking away for decades space that might otherwise have been used by the public. Its presence on Glebe Island would be a major blow to any redevelopment of the White Bay Power Station, the Heritage Silos and surrounding areas. Any attempt to pretend otherwise should be given the short shrift it deserves.

BPTP Principle – “Generate optimal housing supply outcomes based on a model of diverse housing options, the highest design principles and activated public spaces.”

Hanson response – *“The proposed development does not address this principle, but it does not prevent other applications from addressing housing.”*

Hanson’s answer conveniently overlooks the reference to “activated public spaces”. Reindustrialising Glebe Island explicitly prevents the activation of public spaces, which is detrimental to the development of housing. Glebe Island should be transformed along the lines of Barangaroo with mixed - use housing supply, commercial activity and public spaces, **all of which would be prevented for decades if this application is approved.**

BPTP Principle – “Ensure the land use and associated development is diverse, beautifully designed and creates ‘great places and great spaces’.”

Hanson response – *“The proposed development is for an industrial use, which is consistent with the historic use of the site and with the zoning of the land. It is acknowledged that the site will be redeveloped in future to create an integrated urban renewal outcome including a port.”*

Clearly, Hanson’s proposed concrete plant conflicts totally with this principle. It is the complete antithesis of ‘great places and great spaces’. Hanson continues to rely on the same deeply flawed argument that its concrete plant is “consistent with the historic use of the site”, as if all future ills can be justified by reference to the past. At the same time, **it ignores the objective of ensuring the good design of land and buildings.**

COMMENTS ON THE HANSON RtS

General criticisms

The RtS is a blatant exercise in self-advocacy and self-justification. Rather than offer any meaningful mitigation of the well-demonstrated raft of adverse environmental impacts from the proposed project, the RtS simply denies, downplays or ignores those impacts, using the following tactics:

Reliance on the evidence of non-independent experts

A range of captive experts who champion the case of their paying client is used to deny and/or downplay adverse effects. Both the RtS and the original Environmental Impact Statement (the EIS) are replete with ‘data’ and ‘analysis’ to support the patently absurd claim that a plant producing 1 million cubic metres of concrete per annum in the heart of Sydney with associated truck and ship traffic “would not cause any significant environmental impacts”. Hanson’s experts are clearly not independent.

Unacceptable uncertainty

Despite the convenient “analysis” of Hanson’s experts, the RtS remains fraught with unacceptable levels of uncertainty. Too many of the assurances about benign outcomes are hedged with words like ‘anticipated’, ‘predicted’, and ‘expected’. Adverse outcomes are described as ‘unlikely’, without justification as to why. Residents (such as I) who live close to Glebe Island expect that, if this facility is approved and all the purported anticipation, prediction, and expectation turn out to be wrong, and the ‘unlikely’ happens, **it will be too late.** Hanson will have locked in its twenty-year-plus concrete plant and Sydney will be stuck with all its social and environmental consequences. And there will be no comeback against Hanson or its advisers or the political forces who have (so far) ensured that they remain remote and detached from the debate.

The fallacy of ‘business as usual’

Perhaps the most outrageous argument in the RtS (and the EIS) and the one on which Hanson’s application most heavily relies, is that the establishment of a million cubic metre per annum concrete plant with hundreds of ship movements a year is just “a continued use of the existing port facility”; just business as usual. According to Hanson, its gigantic plant and associated massive increase in trucking and shipping would not represent any kind of change.

This flawed and disingenuous argument is used by Hanson for everything from asserting compliance with the Bays Precinct Transformation Plan to denying any increase in noise and air pollution in the area. Consider the following:

Fact: The site on Glebe Island proposed for the Hanson plant has been substantially empty for years. It was last used on any ongoing basis twelve years ago when car imports were brought in through Glebe Island. Wikipedia states that “Glebe Island *was* a major port facility in Sydney Harbour and ... *was* the primary receiving venue for imported cars and dry bulk goods in the region.

Fact: The Hanson project would result in a huge escalation of shipping activity at Glebe Island wharves 1 and 2. Hanson says that the shipping volume would not exceed “historical numbers”, clearly a distortion of the truth, as only a handful of ships have berthed at GI 1&2 each year over the last 12 years. With Hanson proposing (but not limiting itself to) 120 ships a year (240 shipping movements), it is misleading to run a “continued use” claim based on “historical numbers” and a “use” that ceased more than a decade ago.

Fact: The RtS states that “the Glebe Island and White Bay ports are already operational 24/7”. This is extremely misleading in view of the relatively low level of activity at GI 1&2 over the last 12 years, and particularly on the site of the proposed Hanson facility. Only two or three bulk materials ships berth each year in terms of post-2008 history. There is a range of minor activity involving small boats and barges such as the preparation of the New Year fireworks and the unloading of waste from Garden Island, low-level and low-frequency uses that both the BPTP and the majority of local residents support, most of which occurs in normal business hours. To imply that GI 1&2 is “operational 24/7” is frankly dishonest.

Fact: That environmentally undesirable and detrimental activity was carried on in the past is no justification for recommencing it. The unacceptability of all forms of pollution, particularly in densely populated areas, has increased dramatically in recent years. To contend that shifting from two or three ships a year to 120 is fine simply because Glebe Island has always been a port is ludicrous. Times change. Much that was appropriate in the past is no longer appropriate.

Fact: Pyrmont is now one of the most densely populated areas in Australia. Since car imports through Glebe Island ceased in 2008, hundreds of apartments have been built in Pyrmont directly opposite the Hanson site on land which was previously part of its industrial context (CSR site), many of them within 200-300 metres. The last high-rise apartment block was not completed until 2013. Accordingly, it is nonsensical to argue that the Hanson project would have no “significant environmental impacts” because it would just be the “continued use of an existing port facility”

and would represent no change. This argument totally ignores both its changed context and State Government promises made to the people in the BPTP.

I submit that Hanson’s “existing use/continued use” argument does not stack up. It cannot be employed to deny and/or justify the severely adverse environmental and social impacts of this proposed project.

The relationship with the Port Authority

There is a second fundamentally flawed argument in the RtS - that the DPI&E should consent to the project because the NSW Port Authority (the PA) would restrict and regulate Hanson’s activities to prevent problems. This argument is used by Hanson for everything from denying excessive noise to rejecting any time limit on the term of the project.

The essence of this argument is that Hanson’s rights to operate the concrete batching plant and bulk aggregate facility and to berth ships at Glebe Island would hinge on its lease agreement with the PA. That the PA would ensure, (through the agreement) that there would be no adverse environmental impacts, is invalid because the PA cannot be relied on to protect either the environment or local residents, as it is hopelessly conflicted. Based on my community’s experience in dealing with the PA, residents have absolutely no confidence that it would ‘supervise’ Hanson to prevent adverse environmental impacts.

The PA has two major conflicts. First, as the lessor, it would have an obvious financial interest in a lease with Hanson and receiving the highest possible rent. It would not impose any restrictions on Hanson that would either dissuade Hanson from entering the lease or reduce the amount of rent that Hanson might otherwise be prepared to pay.

The second conflict is that the PA's interests are closely aligned with Hanson's. The PA is developing the Multi-User Facility (the MUF) next door to the Hanson plant. The PA does not want any restrictions or controls placed on the operation of the MUF, including the berthing of ships at GI 1&2. Clearly, it would not seek to include any restrictions or controls on the Hanson project for fear that someone would suggest that the same should apply to the MUF. Indeed, it is a failure of Government that The PA's application for the MUF was not subject to the same process as Hanson, both occurring on a State Significant Site subject to the BTP. The PA has consistently demonstrated its complete indifference to issues of public health and safety.

I and many others are particularly concerned that Hanson and the PA will enter a long-term contract upfront that contains vague undertakings and assurances from Hanson that the PA would never enforce. For example, the RtS refers to the proposed "noise management precinct", stating that the PA will manage noise "across the entire noise precinct, enabling more efficient implementation of *reasonable and feasible* noise mitigation measures". One might well question, however, whether the PA would ever require Hanson to take mitigation measures like a curfew or shore-to-ship power if the PA wanted to avoid doing the same. Surely the parties would agree between themselves that the relevant mitigation was not reasonable or feasible, as they are prone to do.

This level of cynicism is nourished by the fact that the PA and Hanson are using many of the same experts for the MUF and the concrete plant eg. AECOM and SLR Consulting. In the case of a dispute between Hanson and the PA on, say, a noise issue would SLR talk to SLR to resolve it?

The MUF and the Hanson plant are, in effect, joint projects and it is inconceivable that the DPI&E could contemplate consenting to Hanson's project by relying on the PA to act as the future policeman of Hanson's activities. In this regard, the PA is not exactly an ideal citizen itself when it comes to environmental compliance. It is subject to an environmental protection licence in relation to some of its own activities on Glebe Island - EPL 13008 – which it has managed to breach in ten years of its eleven-year life, including its continued failure to meet noise limits.

Despite the fact that the NSW government owns the PA, I hope that the DPI&E will judge the Hanson project solely by reference to the appropriate planning, environmental, and social criteria without being influenced by extraneous political or financial considerations. The lack of willingness to consult with the public kills any optimism here.

Specific Criticisms

Although it's not possible to comment in detail on the entire RtS due to the highly technical nature of many of the issues, particularly air and noise pollution, it contains numerous flaws that are self-evident even to the layperson.

Noise pollution

The noise issue demonstrates the absurdity of Hanson's contention that its project "would not cause any significant environmental impacts". Take the following admission from page 6 of Appendix C prepared by SLR Consulting - "Further at Pymont, cumulative amenity noise levels may exceed the Precinct amenity level of 55 LAeq(4hour) by up to 3 dBA during the evening, and during the night-time may exceed the Precinct amenity level of 50 LAeq(9hour) by up to 8 dBA." It's important to note that **an exceedance of 8 dBA is enormous!** In fact, it is generally accepted by acoustic engineers that an increase of 10dBA represents a doubling of sound intensity due to the non-linear scale applicable to sound levels. These apparently minor increases would have a disastrous impact on the lives of residents. For Hanson and its advisers to dismiss it as insignificant is contemptible. For an Australian government in 2020 to allow it is surely both equally contemptible and unimaginable. **Any exceedance of Precinct amenity levels must be regarded as completely unacceptable and representing a valid reason to refuse an application.**

I also believe that the noise levels used by Hanson are understated, as the RtS and the EIS do not appear to specifically address the source of the loudest noise, namely the arriving and departing of ships. Residents know from experience that the greatest noise pollution (by far), and the greatest cause of sleep disturbance, come from the engines of ships manoeuvring in and out of berths. Conveniently, Hanson's documents refer generically to "shipping noise" and the focus appears to be on the noise from a berthed ship unloading.

There is no specific analysis of ship movements and no mention of tugs. Residents know from experience that tugs can be even louder than bulk materials ships, none of which appears to have been analysed. Hanson's response is completely silent on ships docking and it is reasonable to assume that ship movements, especially if tugs are involved, would generate night-time exceedances of even more than 8 dBA - in other words, **doubling of acceptable noise levels**. This is a truly frightening prospect given Hanson's projection of 240 ship movements per annum!

Page 2 of Appendix C states that "the predicted noise levels from vessels servicing the Multi-User Facility and the Batch Plant are less than historical noise levels" - the weak 'business as usual' argument already discussed above. To justify a huge increase from half a dozen ship movements annually to 400 ship movements annually (120 Hanson ships and 80 MUF ships) on the grounds that such levels of traffic used to happen more than a decade ago (before a major expansion in the population living directly opposite) is a disingenuous if not downright misleading contention.

Furthermore, the 24/7 nature of the proposal would subject the residents of Pymont to not only a **massive increase in noise pollution** but also one that **would occur around the clock**. This is a major point of contention for the local community. I note that the DPI&E raised this specific issue with Hanson and requested "additional information and justification to support the need for 24 hours, seven days a week operation", which is only referred to on page 29 of the RtS. **It is noticeably absent from Hanson's detailed response to the DPI&E's questions in Appendix C.**

Hanson's response in the RtS is both superficial and inadequate. It has three planks, the first being - "As noted above, although consent is sought for 24-hour operation, the uptake of this operation will be **driven by market demand**. Particularly in light of the restriction in production capacity proposed within this response (note Section 3.3), 24-operation **may not be required** on a regular basis **within the first five years** (up to 2023). Even after this time, assuming that a full operational capacity is approved, the requirement for 24 hour operation will be **unlikely to occur every day**, rather in response to specific market demands and to accommodate (and expedite) maritime unloading activities."

Typical of Hanson's response to so many submissions, it hedges about with possibilities and maybes but provides no actual justification for a 24/7 operation. If this is all as uncertain as Hanson suggests, why couldn't Hanson simply

operate with a reasonable curfew, which would prevent the worst of the noise pollution and (particularly) the biggest problem - namely sleep disturbance - for people like me who are living in the 1,400 apartments across the water?

The second plank of Hanson's justification for a 24/7 operation is that "the Glebe Island and White Bay ports are already operational 24/7". As discussed above, this is frankly dishonest and consent for Hanson to operate 24/7 could never be justified by reference to current activity levels and operating hours at GI 1&2.

The third plank of Hanson's response is not a justification but simply a reassurance. On page 29 of the RtS, Hanson states that "the impact of the 24-hour operation on the residential amenity of the surrounding areas will be managed in coordination with Port Authority". In other words, don't worry, just trust us. As discussed above, the PA is entirely conflicted and has regularly breached noise limits under its own EPL. It is difficult to overstate how little confidence the Pymont community has in relying on the PA to manage "the residential amenity of the surrounding areas".

In summary, **Hanson does not provide, in its RtS, any actual reasons** why its concrete plant would need to function 24/7 or why ships would need to arrive and depart at any time of the day or night. **But it's impossible to overstate how acute this issue of quantity and timing of ship movements is, given their impact on sleep.**

In an apparent attempt to downplay the appropriateness of noise controls on shipping, page 1 of Appendix C states that "the management of ship noise has more in common with aircraft ... than an industrial site". If that is Hanson's

view, **it cannot object to a curfew arrangement of the type in place for aircraft at Sydney Airport!** If international aircraft schedules can be organised to work around a curfew, surely the same is true of Hanson's ships.

In defence of the excessive noise levels that its project would produce, Hanson states (on page 2 of Appendix C) that "planning controls were in place to protect residences of apartment buildings at Jackson's Landing through building design". This is a euphemistic way of saying that residents should be OK if they keep **all their doors and windows shut all the time (24/7)**. Hanson, like the PA, **wants to use attenuation at the receiver** to justify unacceptable noise levels and to avoid having to take any mitigation steps itself.

The combination of night time doubling of acceptable noise intensity, no curfew, and 240+ ship movements a year (400 with the MUF and no limits applied) means that many **Pymont residents would effectively have to spend the rest of their lives with all their doors and windows shut** on the basis that a ship could turn up at any time, night or day. Is this an outcome that the State Government/DPI&E is prepared to allow? Surely, in Australia in 2020, people should have a basic right to sleep with a window open to have some fresh air! Clearly, some of the parties involved in the proposals to redevelop Glebe Island are not interested in the preservation of basic human rights. At the very least, they do not fully appreciate the gravity of this situation and the distress that it is felt by many Pymont residents.

I note that many people in Jacksons Landing experience that, even with all their doors and windows shut, the noise of a bulk carrier being guided at night into a berth at GI 1&2 by tugs can be loud enough to cause serious sleep disruption. That is the reality of lived experience and not theoretical, 'predicted' and convenient noise assessment.

The DPI&E put many detailed questions to Hanson in relation to the concrete plant proposal. While not being an acoustic expert, I remain highly suspicious of many of Hanson's responses which are evasive, uncertain, dismissive, and overly optimistic. Inevitably, most of them fall back on variations of the three discredited arguments – continued use of an existing port; apartments in Jacksons Landing are sound-proof; the PA would ensure no problems.

A request of the DP&E that is of particular interest is point 10 on page 8 of Appendix C – "Provide detailed information regarding the assumed mitigation measures and provide evidence to support the claim that no corrections are required for annoying noise characteristics." Once again, we know from lived experience that 'tonal noise', 'low frequency noise' and 'intermittent noise' are extremely disturbing and can severely disrupt sleep. Hanson's response (page 9) takes half a page to dismisses these three noise problems **but fails to provide the evidence requested by the DP&E**.

Air pollution

Air pollution is another highly technical issue, which makes it difficult to understand or comment on most of the air quality analysis in the RtS and the EIS. Again, I fall back on lived experience. I know that on the rare occasions when a bulk carrier is berthed at GI 1&2, I can see and often taste the crude diesel fumes belching from its funnel. Whilst this has not been a material issue in Pymont for many years - given the infrequent berthing of bulk carriers at GI 1&2 since 2008 - it would surely become a significant health issue should the project be allowed to proceed. I also regularly walk past the existing Hymix concrete plant on Bank Street Pymont and observe the grey/white coating of cement dust over everything in the vicinity and wonder about the finer particles we are all breathing. Imagine the compound effect of the southern hemisphere's biggest concrete plant with the adjacent massive cement storage facility in the Glebe on air quality! I'm not sure how the BPTP could ever be sold to anyone with the area turned into an industrialised retreat to the past, coated in cement dust and requiring earplugs for its inhabitants.

My community is conscious of the reports of Balmain residents about the air pollution generated by ships at the White Bay Cruise Ship Terminal. Comparing the White Bay and Pymont situations is useful in understanding the scale of the environmental impact if the Hanson project proceeds at Glebe Island. White Bay involves a relatively small number of cruise ships, almost all over the summer season, and many of which stay overnight. That part of Balmain is not densely populated. By contrast the Hanson project would involve 400+ ship movements each year, with many of them staying overnight, sometimes multiple days, and thousands and thousands of truck movements

out of already-congested roads, all within one of the most densely populated areas in Australia. The grief and distress that air pollution has caused at White Bay would pale into insignificance compared to the impact at Pyrmont from the Hanson plant and its neighbour the MUF.

The recent air quality problems in Sydney from the bushfires has greatly heightened the city's sensitivity to air pollution and its adverse health impacts. We are increasingly aware of the dangers of even minor levels of air pollution. The Sydney Morning Herald recently reported that "researchers say there is 'no safe level' of PM2.5 air pollution after a large-scale study found a significant association between cardiac arrest and exposure to fine particles" (<https://www.smh.com.au/national/no-safe-level-study-links-pm2-5-pollution-to-increased-risk-of-cardiac-arrest-20200128-p53v98.html>). Against this background, it therefore seems inconceivable that the DPI&E could approve a project that would introduce multiple sources of air pollution into the heart of the city.

It is clear from the RtS that Hanson (or the PA) has no real interest in mitigating air pollution. Consider Hanson's trite response to the following request from the DPI&E on page 12 of Appendix C – "Further consideration should be given to the provision of shore to ship power in partnership with the Port Authority NSW, including the use of solar power and a battery storage facility; to generate sufficient power to enable shore to ship energy supply at both facilities. " Hanson's response is shorter than the Department's request. It dismisses out of hand the possibility of providing shore to ship power saying that "the concept is not technically feasible or practically reasonable". Read "we could not be bothered to do this because we think we'll get approval anyway" Both the PA & Hanson are obviously more concerned about cost structure than considering any meaningful mitigation. If this were not the case, such mitigation would have been offered in the RtS. This lack of due care is clearly unacceptable and reeks of gross arrogance and carelessness. It makes a nonsense of references in Appendix C to "industry best practice".

Shore to ship power could address both air and noise pollution. I understand its use is growing exponentially in Europe, in the US and throughout Asia. Europe is requiring ports to provide shore to ship power by 2025. We note in this regard that the PA, initially unwilling even to entertain the possibility of shore to ship power for the White Bay cruise terminal, is now reluctantly reviewing the issue - <https://www.smh.com.au/national/nsw/spotlight-back-on-cruise-ship-fumes-at-sydney-s-white-bay-terminal-20200129-p53voz.html>.

Visual impact

Not much more needs to be said about the severely adverse visual impact of the proposed Hanson project. No response from Hanson can address this problem. The pages of analysis in Appendix F cannot alter the fact that at the end of the day it would be an ugly concrete plant over-scaling and obscuring nearby heritage-listed structures

with its 34m high silos and crude industrial fabric. No "Landscape and Public Art Strategy" would be able to hide that harsh reality.

Sydney is currently flourishing and going through something of a renaissance – the new airport, the new light rail, the new metros, the rejuvenation of Barangaroo, Darling Square, Green Square, the extension of the NSW Art Gallery. In the context of this renaissance, why would anyone entertain establishing a twenty-year-plus concrete plant on the edge of Sydney Harbour on a site designated as State Significant? It would be an eyesore for international visitors arriving at White Bay or travelling by ferry to Blackwattle Bay and the new Sydney Fish Market. It would be a blight on the view of Sydneysiders strolling on the proposed Bays foreshore promenade - a ridiculous and obscene affront.

Premier Berejiklian recently claimed that "We are, for the first time, treating Pyrmont and the Western Harbour Precinct as the gateway to the CBD". If that is true, Hanson cannot be allowed to construct a major concrete plant directly opposite Pyrmont, at the gateway to the Bays.

The term of the Hanson project

I note that (on page 29 of the RtS) Hanson contends that “placing an expiration date on any development consent associated with this application is not necessary”. I wonder how Hanson can justify this contention. Again, Hanson relies on the argument that it would be under the control of the PA - “the tenure of the Hanson operation on the Site can be controlled via the leasing arrangements that will be in place between Hanson and the Ports Authority of NSW”. Read “nothing to worry about and no need to set an expiration date because the PA would look after everything”. As discussed above, that provides no comfort whatsoever and completely ignores the BPTP. The PA is hopelessly conflicted, and there is nothing to stop it permitting Hanson to remain long after other parties wanted the concrete plant gone.

Clearly, there is a major inconsistency between the various references in the RtS to the 10-15-year timeframe for the redevelopment of the Bays Precinct and Hanson’s business case for this project that assumes a minimum term of twenty-years-plus. If this project were to proceed without a fixed expiration date, the timing of the BPTP could seriously delayed with the local community forced to suffer a concrete plant for 20-25 years or more.

Hanson describes its project as “an interim use of the site” (page 22). This is another clear case of Hanson being disingenuous. It continually seeks to downplay the true environmental and social significance of what it is proposing.

SUMMARY

The existing Hanson facilities operating at Bank Street (Hymix) and at Blackwattle Bay (Hanson) carry a 6:00am to 6:00pm restriction. But somehow Hanson seems to believe that transferring these operations to Glebe Island automatically confers a 24/7 licence regardless of their effect on nearby residences. This suggests a commercially driven decision which pays no regard to the needs of nearby residents of Glebe, Rozelle, Balmain and Pyrmont for uninterrupted sleep, good air quality, and marine safety; nor for the rights of citizens of and visitors to Sydney to take pride and pleasure in a revitalised and transformed Bays Precinct.

The lack of substance, detail, comprehensiveness and integrity in Hanson’s responses (in the RtS) to questions put by the DPI&E and the multitude of objections from both the public and local Government provides no assurances at all that the proposal is appropriate or reasonable. Indeed, the RtS only serves to confirm the public dismay that this project is commercially driven by powerful vested interests, and residents simply have to live with the consequences.

In my view, the proposed Hanson Concrete Batching Plant and Aggregate Handling Facility has no merit in terms of the public interest and no consistency with the objectives and visions of the BPTP. It is both dangerous and anachronistic. The large-scale expansion of existing port facilities to 24-hours-per-day, 7-days-per-week operations involving huge increases in ship and truck movements is no longer appropriate here amongst nearby residential

communities and should **never** be permitted at the expense of the health and well-being of local businesses and residential communities surrounding Glebe Island.

The aesthetic quality of the proposal is appalling, its contribution to urban fabric is negative, and its respect for nearby heritage structures is non-existent. Both the quality of life and the value of property purchased in Jacksons Landing, based on the visions and promises trumpeted by the NSW (Baird) State Government, would be seriously eroded should this application be approved.

The Department of Planning Industry & Environment should adhere to its announced visions in The Bays Precinct Transformation Plan 2015 and the strategic directions and visions for the future of this vital section of Sydney Harbour. It should therefore refuse any and all applications which contradict this direction, as it should have been able to do with the MUF.

Politicians who parade grand ideas (such as the BPTP) to the public, ideas that shape their choice of residential location, should have the integrity and decency to get on with the planning of those ideas so that public promises are kept. Bending to the influence of powerful bureaucracies and vested interests who operate opportunistically in the vacuum of the failure to produce a master plan to consolidate the visions and objectives of the Transformation Plan is both an insult to and a betrayal of the public endorsement of the BPTP.

I strongly believe that the DIP&E must now reject Hanson's RtS and its EIS, review the overwhelming objections to the proposal, reconsider the BPTP and make a negative assessment of the Hanson proposal in the public interest.

APPENDIX 2

I attach my original review of Hanson's EIS, which I submitted along with my objection to its 2018 development application, as further information in support of my argument that the RtS should be rejected. I believe the RtS does little-to-nothing to deal with the flaws and inaccuracies in the EIS, as outlined in this review.

Environmental Impacts and Mitigation Measures

This EIS provides an assessment of the environmental impacts of the project in accordance with the requirements of the SEARs and sets out the undertakings made by Hanson Construction Materials Pty Ltd (Hanson) to manage and minimise potential impacts arising from the development. It demonstrates that the proposed development is satisfactory in relation to:

1. Strategic planning and land use – as the site is consistent with the current zoning and existing uses of Glebe Island and, is in accordance with relevant directions and actions of key strategic planning policies for the Bays Precinct. Refer to **Section 3.4** and **Section 5.2** of this report;

Comment: see comment above in relation to the Transformation Plan, to which it does not conform. The site also does not comply with the siting principles in the Glebe Island and White Bay Master Plan 2000.

2. Noise and Vibration – as noise associated with the development can be managed appropriately in accordance with the EPA's Noise Policy for Industry 2017. Refer to **Section 5.6** or **Appendix D** of this report;

Comment: Claimed Noise and Vibration management and mitigation is disputed – refer comments on Sec 5.6 & Appendix D. Noise levels (particularly from ships at berth) affecting residents will be above acceptable health limits and will not be manageable.

3. Transport and Accessibility – as the development will not alter current or forecasted traffic conditions. The proposed infrastructure upgrades associated with Westconnex, Western Harbour Tunnel is expected to further alleviate traffic impacts and improve the performance of key intersections in the vicinity of the Site. Refer to **Section 5.8** of this report;

Comment: traffic conditions and claimed impacts are disputed – refer comments on Sec 5.8 & Appendix H. Very substantial truck-related impacts are overlooked in this EIS.

4. Visual Impacts and Views – as the proposed development is consistent with the existing working harbour theme and character of Glebe Island. The development is also consistent with the adopted Glebe Island and White Bay masterplan which permits development of comparable bulk and scale on the site. While the Visual Impact Assessment undertaken by AECOM identifies some visual impact as result of the development, the moderate to high impact is in part due to the high sensitivity of these observer locations to any change in views. Suitable mitigation measures are proposed to assist in 'bedding down' the structures into the surrounding landscape. Refer to **Appendix E** or **Section 5.3** of this report;

Comment: the EIS acknowledges that there will be (adverse) visual effects - refer comments on Sec 5.3. This facility is very large and a range of adverse visual impacts, many of them highly significant, would clearly result.

5. Marine Traffic, Navigation and Safety;
6. Built form;
7. Lighting;
8. Heritage;

- 9 Consultation;
- 10 Utilities;
- 11 Ecologically Sustainable Development (ESD);
- 12 Contamination;
- 13 Biodiversity;
- 14 Hazard and Risks;
- 15 Cumulative Impacts.

Comment: I believe the proposed development is not satisfactory as claimed, in relation to most of the above headings, as will be demonstrated in this review.

All measures that have been recommended as part of the detailed technical studies to mitigate potential environmental impacts have been incorporated into the proposed development or are included in the Mitigation Measures at **Section 6.0**.

Comment: This statement is disputed throughout this review. Generally, impacts appear to be omitted, discounted or watered down to appear minimal or borderline, when they are not! In many cases mitigation of the more significant impacts is not even possible or practicable.

Conclusion and Justification

In considering economic and social impacts, including the principles of ecologically sustainable development, proposed development is justified for the following reasons:

While some visual impact is noted as result of the development, the high to moderate rating is due to the high sensitivity of receptors to even minor changes in their views, rather than the magnitude or significance of the visual impact itself. Notwithstanding this, the proposed development is consistent with the existing and previous industrial use and character of the Glebe Island. Mitigation measures are proposed to ameliorate visual impact and allow the development to integrate with its setting and appear less visually stark or prominent. Aside from visual impact, no significant environmental impacts are predicted;

Comment: Since the so-called receptors were in place prior to the application, it is not valid to use their sensitivity as a means of diminishing the significance of any effects.

The proposed use is in keeping with the existing industrial land uses and working harbour character of the Glebe Island for the immediate and short-medium term (10 – 15 years);

Comment: The proposed development is not in keeping with the objectives and visions for the Glebe Island Destination in the Bays Precinct Transformation and should be rejected as an inappropriate usage of the site. Glebe Island is clearly transitioning from industrialised, port-intensive usage and this transition is supported in the Plan's visions. Intensified heavy port- and industrial usages are clearly retrograde and completely unjustifiable in this context – whatever the timeframe of transition. It is also not in keeping with many of the principles and provisions of the Glebe Island and White Bay Master Plan 2000.

The proposed development will ensure adequate supply of concrete in proximity to areas earmarked for extensive renewal and development, with capacity to meet future demand and avoid unnecessary delays in construction timing;

Comment: This does not in itself validate the proposed location. Adequate supply of concrete does not rely on the Glebe Island facility as the only suitable location. This is a weak justification to support an opportunistic commercial proposal.

The proposed development will offset job losses resulting from the closure of the other aggregate/concrete batching facilities in the Bays District Area;

Comment: This does not in itself validate the proposed location

The proposed development, owing to the aggregate shipping terminal facility, is more efficient and sustainable than other typical concrete batching facilities which would depend on extensive deliveries of raw materials via Sydney's road network; and

Comment: Perhaps more efficient for the proponents but potentially disastrous for adjacent residences and businesses. The lack of balance between these interests – in favour of the proponent - is not justifiable.

The proposed development will improve the efficiency and sustainability of Hanson's other concrete batching facilities in the area by removing extensive deliveries of raw materials via regional road networks.

Comment: Perhaps, but at enormous cost to existing businesses using James Craig Rd and to the detriment of both local residents and other enterprises. Raw materials would in fact be delivered through intensified truck movements on local roads. This justification seems bot extremely poorly considered and careless.

The potential impacts of the proposed development are acceptable and are able to be managed. Given the planning merits of the proposed development, the proposed development warrants approval by the Minister for Planning.

Comment: The EIS seems to have been written with the objective of watering down most of the significant impacts so that the above (desired) conclusion can be made. It is misleading, disingenuous, and disreputable. In fact, the real potential impacts would be totally unacceptable, and some cannot be managed at all.

Therefore, the proposal warrants refusal by the Minister for Planning as retrograde, out of step with the interest of the public, dangerous, injurious to public health and safety and opportunistic.

1.0 Introduction

1.1 Background to the Development

.....As part of the future development of this precinct, changes to the operation of the existing Hymix and Hanson facilities are inevitable. The effect of this change will be immediately felt by the existing Blackwattle Bay facility, which is due to imminently cease operation.

Comment: The Bays Market District Master Plan is not yet complete, and no DA has been submitted for the new Fish Markets. Development consent and construction commencement for the new Fish Market is likely to be years away. The statement relating to immediate cessation of operation is unreliable and creates artificial urgency. It is much more likely that this is an opportunistic and commercially-beneficial project for Hanson to pursue and that a sense of urgency is necessary to create.

The operation which is due to cease is not a 24/7 operation. There is no reasonable justification - apart from commercial self-interest for its replacement to become a 24/7 operation.

1.2 The Bays Precinct

Glebe Island itself is expected to be transformed into a vibrant mixed-use area centred on a new metro rail station.

The NSW Government is still in the early planning phases of many of these projects and, as such, no specific information is currently available as to the future character of the area. It should be noted that in the NSW Government's 2015 document, The Transformation Plan: The Bays Precinct Sydney, Glebe Island a 'longer term' priority and will be investigated in a period following 2022. The Transformation Plan notes that Glebe Island will become a "Strategic deep-water port and potential technological and innovation campus".

*Comment: There is sufficient public information available to indicate that the future character of the area is **not compatible with large-scale industrialisation of Glebe Island nor conversion of its entire perimeter to a deep-water port**. This proposal, in the context of the adjacent MUF proposal would dominate the character of Glebe Island and deter investors attracted by the concept of an innovation district. This writer can see no reference to the claimed notes in the Transformation Plan to the effect that "Glebe Island will become a strategic deep-water port..."*

The following are quotes taken from the Bays Precinct website in relation to possibilities and features of a revitalised Glebe island:

- "The transformation of The Bays Precinct offers the opportunity to support 'blue' economic activities of port and maritime industries, combined with a new mixed-use innovation district."
- "A transformed White Bay Power Station, and future transport infrastructure, will act as catalysts for regeneration and for knowledge-intensive sectors expanding throughout The Bays Precinct. This would enable the NSW Government to position the Destination for the future by leveraging its strategic position in Sydney Harbour to create an economic hub that will promote Sydney's global economic competitiveness."
- "A new innovation district anchored by the knowledge-intensive industries of the White Bay Power Station technology hub."
- "Retention of important elements of port and maritime industry."

There is a clear impression that the EIS attempts to distort the vision for Glebe Island by over-emphasising its port function and suggesting that the proposed facility is harmonious with the visions outlined to further the proponent's cause. This facility is clearly not compatible with and will impede the realisation of those visions.

The Bays Precinct project website notes that Glebe Island “is currently an integral part of Sydney’s logistics capability for essential construction materials and working harbour services”. It is understood that NSW Government agencies are working together to investigate how changes to Glebe Island could occur in the future and that any significant change to the form or function of Glebe Island will not affect the Site for 10 to 15 years.

Comment: This suggests that the proposed Concrete Plant is an acceptable use for 10-15 years, whereas the Transformation Plan refers to a post-2022 timeframe for commencement of works that reflect its visions. That is only 4-5 years from now! This would result in a potential overlapping of new innovative facilities and large-scale industrialization for many years, with obvious issues of compatibility and co-existence.

In addition, it is clear elsewhere in the EIS that the proponent actually views the facility as having long-term compatibility with future visionary development on Glebe Island. This short-term/long-term confusion of occupation of significant areas of land on Glebe island - with facilities that do not have long-term relevance or compatibility in their proposed locations - would be a major negative for efficient and successful master-planning of the overall site.

1.3 Overview of Proposed Development

The batching plant is proposed to adopt a low-profile design sympathetic to its surrounding environs. The majority of the batching activities will be undertaken in an enclosed area in order to limit the noise and air quality impacts of the proposed plant. The highest structures will be the aggregate silos which will be approximately 34m tall, substantially lower than the adjacent heritage listed Glebe Island Silos. Cement silos will also be installed on the Site, these will be approximately 25m tall.

Comment: These appear to be deceptive statements attempting to convince people that the proposed concrete batching plant is other than it is – very large!

34-metre high silos do not represent a low-profile design sympathetic to its surrounding environs. 34 metres is the equivalent of an 11-storey building! To put this into perspective, Evolve (the apartment building directly opposite the proposed concrete plant) is 12-storeys in height. I understand that the existing Glebe Island Silos are approximately 43m in height. In fact, the scale of this proposal is so large that views of important heritage and iconic buildings such as the Glebe Island Silos and the Anzac Bridge will be obliterated from many vantage points along the public parks and promenades alongside Johnstons Bay. The character of Glebe Island is low-profile. The character of the proposed facility is not.

1.5.1 Strategic Need

The co-location of the proposed batching facility with an aggregate handling facility will reduce impacts on the wider road network by allowing aggregate to be delivered to the heart of the Sydney CBD, Inner West and Central suburbs of Sydney.

Comment: This claim is disputed. As pointed out in later comments in relation to traffic issues, the proposed facility would generate substantially more truck movements than it would reduce. It would have significant impacts on local traffic both within Glebe Island (James Craig Road) and at the entrance/exit point to Victoria Road. The resulting level of truck congestion would substantially diminish any opportunities for the visions for Glebe Island in the Transformation Plan 2015 to ever be realised.

2.0 Site Analysis

2.2 Site Description

The Site is located within the southern end of Glebe Island, adjacent to Glebe Island Berth One (GLB1). Glebe Island comprises of a single lot, legally described as Lot 10 under Deposited Plan 1170710. The Site has a total area of approximately 16,198m².

Comment: The size of the site – approximately 2 1/2 football fields – together with the proposed height of 34metres, gives some idea of the very substantial size of this proposed development. A review of traffic impacts, appearing

later in this document, highlights an astonishing number of truck movements, which are hard to believe on their own. However, it is obvious that the throughput of this proposed facility would be enormous - quite out of scale with its context and immediate location. This site lies within 200 metres of existing residents and public open space. It is obvious that impacts on its environs will be very substantial.

Please note the following provisions relating to siting of large facilities which appear in the Glebe island and White Bay Master Plan 2000

- Setback buildings a minimum of 20m off the water's edge as shown in Figure 10, Figure 12 and Section A-A and Section B-B.
- Provide two building zones (Figure 12) for a modern warehouse of up to 10,000sqm in floor area and 12m maximum height.
- Provide a zone for a large building for a 6-7 level parking structure of 15,000sqm building up to 25m maximum height generally within the current building envelope of the existing silos (Figure 12).

Comment: The building zones shown in Fig12 of the Master Plan do not occur along the wharf or near either the Anzac Bridge or the old Glebe Island bridge. They are in more internal positions in accordance with the stated principles relating to maintaining existing views of major landmarks and respecting urban context. Clearly the intent of the master plan is to avoid placement of large structures along the waterfront or too close to landmarks so that they do not conflict with them or block views of them. Clearly, the proposal does not comply with the 2000 master plan on the issue of location and ignores the spirit and provisions of that plan.

(EIS) 2.5 Surrounding Development

The north-western edge of Pyrmont peninsula is located east of the Site and is separated from the port facility by the foreshore water of Jones Bay. The residential dwellings in Bowman Street, Pyrmont are the closest residential dwellings to the Site. However, it should be noted that these dwellings were constructed on the basis of continued port operations at Glebe Island, and so have been designed and constructed at the time of their development with additional acoustic treatments to account for these port-related activities.

*Comment: I am not aware of any significant acoustic treatment built into the buildings referred to nor was made aware of any such measures at the time of purchase. **The dominant façade elements in these buildings consist of glazing**, which has little resistance to sound transmission. I am aware of very significant night-time noise levels when ships are berthed at Glebe Island. These are intolerable for many Jacksons Landing residents and would produce significant health issues over long-term exposure.*

As to the point relating to continued port operations at Glebe Island, this is incorrect. Residents here were given assurances at the time of purchase of their apartments that there would be no significant port or industrialised activities on this side of the Island. Indeed, there has been no regular, continuous large-scale activity at GIB1&2 since automobile unloading ceased approximately 10 years ago!

3.0 Description of the Development

3.1 Proposed structure

The proposed development comprises of an aggregate handling and concrete batching facility, made up of the following elements, which are discussed in more detail below:

- Aggregate storage silos and Handling facility;
- Enclosed concrete batching facility; and
- Site Office Building, ancillary infrastructure, and parking.

Comment: The proposed development occupies a site area of over 16,000sqm (approximately 21/2 football fields). The height of the main roof is unclear from the documentation but appears to be around 15m. There are two banks of silos, one (6 silos) being 25m high located in the centre of the building and the other (larger) row of 6 aggregate storage silos along the southern boundary.

This development would appear to most observers as a large-scale industrial building, completely lacking in aesthetic quality; inappropriately sited on the edge of Johnstons Bay and parked awkwardly alongside an existing heritage item; and the antithesis of good urban design. It would be a visual affront

to the high-quality urban design of the Jacksons Landing residential towers only 200m away across Johnstons Bay. It therefore does not comply with the following principles stated in the Glebe Island and White Bay Master Plan 2000:

- Improve the overall appearance of the port.
- Provide a framework to ensure that development within the Port achieves a high standard of urban design.
- Provide urban design principles which recognise the location of the Port adjacent to residential areas with particular attention to the physical provision of noise control measures.

There appears to be no considered or reasonable response to these issues of scale, position and urban design quality in the EIS. Surely the public has a right to know why such significant issues have been overlooked.

As mentioned in the above comments on section 2.2, this is a very large building located close to significant existing landmarks and over-scaling the waterfront. The photomontage in Fig 13 clearly demonstrates the excessive scale of this development, with silo heights which will appear to be substantially higher than the existing heritage-listed silos to the west when viewed from the water and many other positions in the area.

Clearly, views from the Pyrmont foreshore of the Anzac Bridge and the heritage-listed Silos would be substantially affected. In this regard the Statement of Heritage Impact (by AECOM), which accompanies the EIS, appears to be both incorrect and inadequate in some of its conclusions. These are iconic structures that sit comfortably in the current landscape. The proposed development with its 34-metre-high silos would obstruct views of this internationally-acclaimed bridge from various vantage points and is a complete affront to the objective of developing tourism and commercial innovation in the area.

3.1.4 Site Vehicles

Three main types of commercial vehicles will operate at the plant:

- A total of 55 concrete agitator trucks (8.8m & 14m types) – delivering concrete mixed at the plant on-site to building sites throughout the city. Some of these are standard rigid-axle agitator vehicles and some are articulated agitator vehicles.
- Cement tankers (25m B-Doubles)– delivering cement to the Site, this cement will most likely come from the Cement Australia Glebe Island facilities and therefore will not have to access the public road network. Cement tankers may also deliver flyash from regional power stations.
- Aggregate trucks (19m prime mover-dog trailer combination tippers – two tipper trucks will be based at the Site, trucks based at other concrete batching plant facilities may also access the plant. Aggregate trucks dispatch aggregates and sand to other concrete batching plant facilities – including the Hymix plant at Pyrmont. These are truck and dog trailer and semi-trailer combinations.

Other on-site vehicles will include a forklift, a bobcat and two loaders. Cement deliveries are expected to be made by B-Double tankers.

Comment: Consideration of both truck types and truck numbers (see below) would confirm conclusions that this proposal, along with the proposed MUF, would dominate Glebe island and establish a character of large-scale industrialisation which would be completely incompatible with the objectives in the Transformation Plan.

3.2.2 Aggregate Dispatch

.....aggregate will be dispatched from the aggregate storage silos to aggregate delivery trucks for dispatch to other facilities in the surrounding area.....

Consent is sought for a maximum of 241 aggregate deliveries per day. This frequency of delivery would only be achieved when the proposed development is operating at full capacity, which is anticipated to be an infrequent occurrence.

Comment: 241 aggregate deliveries per day equates to 482 truck movements per day in/out of Glebe Island.

3.2.3 Concrete Batching

.....When the plant is operating at peak capacity, up to 120 concrete deliveries can be made from the plant each hour. It should be noted that peak operation is anticipated to be reached rarely and that under normal operation the number of concrete dispatch events each hour will be significantly lower.

Comment: 120 concrete deliveries per hour equates to 3120 truck movements per day in/out of Glebe Island during daytime shift hours (5am – 6pm). If the concrete plant ran at full capacity over 24 hours – which is clearly its potential – this would increase to 5760 per day. These figures must be taken at face value as the application seeks approval to run to this capacity.

3.2.4 Hours of Operation

The facility is proposed to have the capacity to operate 24 hours a day, seven days a week. The majority of the concrete agitator trucks associated with the proposed development will be parked on the Site overnight, day shift drivers will arrive to the Site in the morning typically between 5am and 8am to start the shift, leaving the Site between 3pm and 6pm in the evening. Night shift workers will arrive to the Site in the afternoon as required by demand. It is not anticipated that a regular night shift will be required by the operation of the Site. The operation of the facility during the night will generally be driven by market demand.

Comment: As the proposed facility is to operate on a 24/7 basis, the resulting truck movements per day at full capacity (24/7 as applied for) for aggregate and concrete trucks would be up to 6242, or 260 per hour, using the figures provided in the EIS. This level of truck movement greatly exceeds claimed savings in truck movements advanced to promote the application. The net result would be greatly increased overall truck movements on GI. It is hard to see road networks in and around Glebe Island having the capacity to cope with such levels of truck movement.

4.0 Consultation

4.2 Community

Table 3 issues raised

Frequency of ships using the facility

Comment : Response mentions approval to bring 30 ships into the precinct but doesn't specify the period and therefore does not clarify frequency. This requires clarification.

Members requested the estimated number of trucks coming from each ship.

Comment: Response confirms that 500 trucks will access the precinct per day. This seems misleading, as it contradicts the number of truck movements per day referred to in section 3 (refer comments above with respect to truck numbers). This raises the possibility that the real numbers were not put forward in the public consultation process.

Members asked whether proposed noise levels will exceed current noise levels.

Comment: Response excludes any reference to ship-engine noise which would be the main source of noise pollution. Also reinforces the possibility that the public was fed "watered down" information in the consultation process in order to proclaim a benign public response.

5.0 Environmental Assessment

5.2 Strategic Planning and Land Use

As outlined in Section 1.2, the Site forms a part of the wider Bays Precinct, which is proposed to undergo planned urban renewal over the coming 10-15 years. Parts of the precinct have been categorised as an immediate, medium or long-term priority. The Glebe island area, including the Site, is identified as a long-term priority (10 -15 years).

Comment: Glebe Island renewal is identified in the Transformation Plan as a longer-term priority, with works commencing in 2022 and beyond. There is no specific reference to 10-15 years on the NSW Government Bays Precinct website, that I can find. If works are to commence from 2022 (4 years from

now), then master-planning and building design work could be commenced within a year or 2. Yet the proposed facility is for an unlimited duration?? The degree of potential overlapping of new planned uses and major industrial facilities in place would create a serious roadblock to achievement of the visions and objectives in and reinforces the incompatibility of the Hanson proposal with the Transformation Plan.

It is noted that the *Bays Precinct Transformation Plan* identifies Glebe Island as a working port with the intention to retain important features of the port. While the details of what this means for the area are not yet publicly available, the proposed development is consistent with the overall staging programme outlined under the Transformation Plan which identifies Glebe Island redevelopment as a long-term priority (10 - 15 years).

*Comment: Glebe Island is described as “A new innovation district anchored by the knowledge-intensive industries of the White Bay Power Station technology hub, with retention of important elements of port and maritime industry.” The possibilities identified in the Transformation Plan include the opportunity to support ‘blue’ economic activities of port and maritime industries, combined with a new mixed-use innovation district. The objectives of the Transformation Plan are **clearly not to establish** expanded port and industrialised facilities all over Glebe Island. Attempts to obfuscate this fact can be assumed to appear to be disingenuous and opportunistic.*

As already noted, the proposed development is not in keeping with the objectives and visions for the Glebe Island Destination in the Bays Precinct Transformation Plan and should be rejected as an inappropriate (and destructive) usage of the site. Glebe Island is clearly transitioning from industrialised, port-intensive usage and this transition is supported in the Plan’s visions. Intensified heavy port- and industrial usages are clearly retrograde and completely unjustifiable in this context – whatever the timeframe of transition, which in this case is not very long at all.

5.3.3 Visual Impact Assessment

development is consistent with existing working harbour character of the area. The industrial nature of the aggregate storage silos and concrete batching plant are sympathetic with previous Glebe Island development and existing structures adjoining the site within Glebe Island.

Comment: The intention in the Bays Transformation Plan is clearly to leave behind the dominant industrial/port character of Glebe island and move forward to a centre of commerce and innovation, while retaining a degree of maritime-related activity and some important landmarks. The claim that the proposed development is “sympathetic with previous Glebe Island development and existing structures adjoining the site within Glebe island” is both completely irrelevant and anachronistic. There is no significant “working harbour character” attached to the Johnstons Bay side of Glebe Island and no significant, regular, port-related activities have taken place here for 10 years. “The industrial nature of the aggregate storage silos and concrete batching plant”, at the proposed location, are not sympathetic to anything except disaster!

The proposed development is also comparable to scale, size and footprint permitted on site by the adopted by the White Bay and Glebe Island Master Plan 2000. As such, visual impact is considered acceptable on the basis that the development is consistent with scale and industrial use envisaged along this part of Glebe Island. Mitigation measures, as outlined below, will be undertaken to ameliorate visual impact and allow the taller and more intrusive components such as the silos, roof structure and shipping container walls integrate with its setting and not appear visually prominent.

Comment: The concrete batching plant has a maximum height of 25 metres and contains roofed silos which are 34 metres in height. It covers an area equivalent to 2 1/2 football fields. It is massive and completely out of scale in its context. Claims that this is “comparable” to scale, size and footprint permitted on site by the White Bay and Glebe island master Plan 2000 are disputed. Clearly, the proposal exceeds what is permitted in that Plan and attempts to “gloss over” this fact. The suggestion of mitigating physical height and scale is disingenuous. It is what it is -very large, over-scaled, out of context. Claims that the taller and more intrusive components will integrate with its setting and not appear visually prominent are plainly false.

*These appear to be deceptive statements attempting to convince people that the proposed concrete batching plant is other than it is – very large! 34-metre high silos **do not represent a low-profile design sympathetic to its surrounding environs**. 34 metres is the equivalent of an 11-storey building! To put this into perspective, Evolve (the apartment building directly opposite the proposed concrete plant) is 12-storeys in height. In fact, the scale of this proposal is so large that views of important heritage and iconic buildings such as the Glebe Island Silos and the Anzac bridge will be obliterated from many vantage points along the public parks and promenades alongside Johnstons Bay. The character of Glebe Island is low-profile. The character of the proposed facility is not.*

Please note the following principles and provisions in the Glebe Island and White Bay Master Plan 2000 have been disregarded in the siting and design of the Hanson Concrete Plant:

The Master Plan provides for an improvement in the port appearance through design standards, landscaping and building improvements. These improvements reflect the existing scale and diversity of the port environment with a focus on the port interface with residential areas

The Master Plan contains a commitment to minimise the impacts of port growth.

“..... the planning and urban design vision for Glebe Island and White Bay follows the objectives in SREP 26 and is to:

- Provide guidelines for **all port development**;
- Improve the public presentation of the port;
- Ensure new development is of a high standard of urban design;
- Improve management of noise, light spill and traffic.....”

Comment: The proposal does not comply with these commitments. For example, siting of a 34m high concrete plant on the edge of Johnstons Bay, on a site the size of 2 1/2 football fields, clearly does not respond to a commitment to minimise impacts of Port Growth. Nor does it respond to the principle of focusing on the port interface with residential areas.

2.4 Views, Building Heights and Building Zones

Background

“The nature of the topography means that the site is overlooked by existing and future residential areas of Balmain and Rozelle as well as the future residential developments at the northern end of Pyrmont. It is also clearly visible from the harbour waters, the Harbour Bridge and Anzac Bridge.

The built form of the Plan Area is dominated by large man-made structures mostly of a horizontal nature with the occasional building having considerable height and bulk – the Glebe Island Silos and the White Bay Power Station and the Anzac bridge adjacent to the site.”

Comment: This domination of Glebe Island by identified landmarks is appropriate and historic. This is clearly intended in the master plan to be respected and preserved in new built-form. The proposal does not comply with these principles. It ignores them.

Principles

- Maintain existing views to landmarks (**Figure 8**) to reinforce the diverse visual quality of the area.

Provisions

- Maximum building heights are shown in **Figure 10**.

Comment: The proposed facility does not comply with these maximum heights in terms of the proposed location.

- Setback buildings a minimum of 20m off the water's edge as shown in **Figure 10**, **Figure 12** and Section A-A and Section B-B.

Comment: Fig 12 provides that large buildings be constructed much further from the water's edge than 20m. The proposal does not comply with this provision.

- Provide two building zones (**Figure 12**) for a modern warehouse of up to 10,000sqm in floor area and 12m maximum height.

Comment: These zones are internal to G and not on the periphery, as is proposed by Hanson. The proposed location of the Hanson facility does not comply with this zoning, nor with the principle behind it - preservation of views to landmarks and domination of built form by existing landmarks, interface with residential areas etc.

- Provide a zone for a large building for a 6-7 level parking structure of 15,000sqm building up to 25m maximum height generally within the current building envelope of the existing silos (**Figure 12**).

Comment: Clearly this designation of internal locations for large facilities is intended to avoid visual conflict with existing landmarks. By contrast, the proposed location will conflict with existing landmarks as well as completely overscale the waterfront.

2.5 Built Quality

Background

The port is a dynamic part of the Harbour. The visual quality of the built environment of the port should be improved as part of the future investment in port facilities.

Principles

- Improve the overall appearance of the port.
- Provide a framework to ensure that development within the Port achieves a high standard of urban design.
- Provide urban design principles which recognise the location of the Port adjacent to residential areas with particular attention to the physical provision of noise control measures.

Comment: In terms of these principles and provisions in the master plan, the Hanson proposal does not comply in both its location at GIB1 and its dominating scale.

(EIS) Table 6 - Observer Location Visual Impact

Comment

Note that magnitude and impact assessments in the table which relate to the locations nearest to Jacksons Landing (6&7) are in the moderate-to-high (mainly high) range.

Note also that the proposal is described as "... A new large industrial context", in contrast to earlier descriptions suggesting smaller scale. It is not just residents of Pyrmont making this claim. It is Hanson itself, as admitted in this section of EIS.

As outlined in **Table 6** above, visual impact is assessed on both sensitivity of an observer location to any change in views and the magnitude of visual change from development of the site. In this instance the high to moderate visual impact rating is due to the high sensitivity of receptors to any change in views rather than the corresponding magnitude of visual effect, which in most instances fall within a low to moderate category.

*Comment: This appears to be an unscientific attempt to obfuscate and explain away the visual impacts which are in the high range. In fact, the impacts are what they are – **very significant** – due solely to the very large size of the proposed concrete plant.*

The development is consistent with existing working harbour character of the area. The industrial nature of the aggregate storage silos and concrete batching plant are sympathetic with previous Glebe Island development and existing structures adjoining the site within Glebe Island. The proposed development is also comparable to scale, size and footprint permitted on site by the adopted by the White Bay and Glebe Island Master Plan 2000. As such, visual impact is considered acceptable on the basis that the development is consistent with scale and industrial use envisaged along this part of Glebe Island. Mitigation measures, as outlined below, will be undertaken to ameliorate visual impact and allow the taller and more intrusive components such as the silos, roof structure and shipping container walls integrate with its setting and not appear visually prominent.

*Comment: Firstly, the development is **clearly not consistent** with existing working harbour character of the area where it is proposed to be located. For many years the character of the Johnstons Bay side of Glebe Island has been established through small-scale maritime maintenance and construction and occasional ship berthing as, primarily, it is a busy waterway. There is no precedent in character for a large-scale industrialised facility along this side of Glebe Island.*

Secondly, the 2000 master plan referred to is 18 years old and will soon be superseded by a new master plan for Glebe Island. It is no longer appropriate to justify opportunistic, large-scale industrial developments on Glebe Island, which clearly are not compatible with the new visions and possibilities announced in the Transformation Plan. A transformation plan, by definition, announces new directions. Old directions – particularly when they are of the scale of the Hanson proposal – are no longer appropriate. In fact, the size and scale of this development is not even in keeping with the principles and provisions of the existing 2000 master plan.

*Thirdly, the proposed location **falls outside zones** designated in the Glebe Island Master Plan 2000 (refer Fig 12: building Zones, Floor Plates in the 2000 GI&WB master plan) This master plan shows areas in which buildings can be sited, as well as maximum building heights, so that they do not dominate existing landmark structures or detract from the horizontal character of major existing structures. To say that "...proposed development is also comparable to*

scale, size and footprint permitted on site by the adopted White Bay and Glebe Island Master Plan 2000 is misleading and inaccurate.

*To claim that visual impact is considered acceptable on the basis that the development is consistent with the scale and industrial use envisaged along this part of Glebe Island.” is both **inaccurate and misleading (downright dishonest perhaps)**. It is a disrespectful and inaccurate distortion of the principals for future development in that master plan. The 2000 master plan makes no such provisions.*

In addition, the LVIA notes that in the coming years, the landscape surrounding and including Glebe Island will be subject to substantial changes, including WestConnex, the Bays Precinct, and the Glebe Island Multi-User Facility. Within the context of this changing setting, the proposed development is considered to be visually representative given the surrounding working harbour character and would be viewed in conjunction with construction activity due to local development.

***Comment:** This reads as another piece of obfuscation which attempts to justify an unjustifiable proposal (eg visually representative of what?). The statement conveniently ignores the most relevant long-term factors in the Glebe Island “landscape”; the ones that belong to a high-tech, innovative commercial centre with some supporting smaller-scale port and maritime activity. If these visions were honestly addressed it would immediately become obvious that the construction of a large-scale concrete plant, whose activities (along with the proposed MUF) would completely dominate the character of Glebe Island, would be a completely unsuitable and incompatible development at this location.*

5.3.4 Mitigation measures

Mitigation measures to minimise visual impact include:

- Design modifications are suggested to reduce the visual impact of the gable roof above the silos. The visual prominence of this structure against the Anzac Bridge setting should be minimised;
- Investigate public art opportunities such as a mural on the concrete silos to minimise the industrial character of the development;
- Consider opportunities to improve aesthetic presentation of shipping container walls;
- Preparation of a Public Art Strategy for the mural and treatment of the shipping container wall; and
- Preparation of an urban design and landscape masterplan that addresses all key elements of the site, including issues such as the nature of any screening and finishes to structures.

***Comment:** The EIS acknowledges that there are significant visual impact issues in the proposed location. However, it does not acknowledge that the location does not fit within the designated zone for large-scale facilities adopted by the White Bay and Glebe Island Master Plan 2000, as explained above (commentary on Table 6) or that this fact only exacerbates visual impact issues. Mitigation measures on such a large-scale industrial structure which does not comply with the existing master plan read as both tokenistic and irrelevant.*

5.4 Air Quality

An Air Quality Assessment Report has been prepared by Pacific Environment and is included at **Appendix I**. The assessment has been undertaken in accordance with the specific requirements set out by the SEARs. A summary of the assessment and proposed mitigation measures are provided below

***Comments:** The Plant Air Quality Assessment by Pacific Environment is too lengthy, verbose and technical to allow a detailed and professional analysis. However, the following comments are considered relevant:*

- *very little coverage and no specific analysis found in relation to air quality impacts from ship engines running continuously while at berth. This is one of the areas of great concern for residents in Pyrmont.*
- *The report does nothing to allay concerns that emissions from ship engines continuously burning crude diesel - together with fine dust particles from bulk materials on vessels coming from countries with low emission-reduction standards - will severely impact air quality. Experience shows - with ships berthing at these wharves in the past – that diesel fumes carried by prevailing NW winds do indeed create air quality issues in the residential neighbourhood opposite.*

Air Quality Assessments in the report specify air quality criteria relevant for assessing impacts from air pollution (NSW EPA 2016). These criteria are health-based and set at levels to protect against health effects. However, because of the proposed 24/7 activity, the proposed concrete plant and its adjacent proposed MUF would see the re-introduction of multiple ships continuously running engines to power auxiliary systems. The cumulative effects from this continuous activity from multiple ships would create an entirely new level of exposure to airborne contaminants than has previously been experienced.

Yet the report seems to indicate that this cumulative increase in impact does not require assessment on the basis of existing port-related usage rights. This begs the question" do existing port facility rights preclude preventing new uses which would have a health impact on residents? The answer provided by the EIS appears to be YES. So where is any legitimate concern for public health in this section (and many others) of the EIS?

In one of the rare occasions where the assessment shows predicted outcomes to actually exceed the acceptable benchmarks, it is noted that on Peak Operational Days there was a predicted excess of the maximum 1-hour NO2 exposure at Evolve. As there is no guarantee that predicted levels would not be above measured levels (usually to the contrary), this clearly constitutes an unacceptable risk to public safety. But it is explained away and not assessed as being significant. Perhaps a little poison is OK?

*There are also predicted excesses for 24-hour PM10 at Evolve. However, the report concluded that these are conservative and then proceeded to adopt more lenient ("contemporaneous assessment") criteria to conclude that it is **anticipated** to meet assessment criteria. Therefore, rather than being conservative on the side of ensuring that the health of nearby residents is not impacted, the report adopts criteria to suit the desired outcome. This is clearly unacceptable and typical of the prevailing attitude in this EIS.*

Surely a balanced and unbiased EIS would be more focused on what the continued, accumulated effects could amount to in order not to risk the health and well-being of residents through increased air pollution from ships and trucks.

5.6 Noise and Vibration

A Noise and Vibration impact report has been prepared by SLR Consulting and is included at **Appendix D**. The report provides a detailed assessment of potential noise and vibration impacts during construction and operational phases of the proposed development. A summary of the assessment and proposed mitigation measures are provided below.

Berth Activity and Combined Operating Noise Levels

The predicted GIB1 activity and the estimated amenity noise levels from the combined operation of GIB1 activity and the facility operation to the nearest residential localities are generally consistent with existing use and associated noise environment. Cumulative noise levels only marginally increased by 1 dBA–4 dBA for daytime, evening and night time activities.

*Comment: These figures relate to **predicted noise levels** which are **lower than noise levels actually measured** in an earlier report by SLR Consulting (ref June 2017 report on CSL Reliance). There does not appear to be any reference to this earlier report in appendix D. One would conclude that the reason is that measured night-time noise levels are higher than modelled noise levels and therefore do not support the contention that noise levels are acceptable. To omit such evidence appears to be a biased, unprofessional, and misleading approach to assessment.*

*In table 19 (page 28) in appendix D, the **predicted Sleep Disturbance Noise Level (SDNL)** is 64 dBA (at Evolve). However, this exceedance is deemed negligible at less than 2dBA. Further, it is claimed that the building façade external level has been built to a criterion of 63dBA (which is curious because most of it is glass) and that, therefore, there is only an excess of 1dBA. Surely, if the NPfl specifies a level of 62dBA, then there should be a MNLEA even for a 1dBA excess. There is no point having a maximum allowable level if it is to be explained away because it doesn't exceed by much! Again, the point has to be made that measured noise levels are in fact higher than 64dBA.*

Hanson will coordinate with ship operators and the Port Authority of NSW to coordinate ship deliveries. Measures to minimise berth activity noise levels associated with unloading of raw materials, ventilation systems, ships engine will be considered by Hanson in consultation with the Port Authority of NSW.

Comments: In appendix D, the Introductory background provides general endorsement of the merits of the proposal, which seems unprofessional for a noise assessment report. This is expanded on in section 1.3 with further endorsements. These endorsements appear as biased and inappropriate and throw doubt on the validity of and motivation behind of the report.

In section 1.4 the statement is made that the (proposed) adjacent MUF has been approved. This is not correct.

In section 2.1, further inappropriate endorsement of the proposed Hanson plant is provided along with the unsubstantiated (and false) statement that the proposed facility will reduce the number of trucks to haul aggregates into Sydney on the regional road network by up to 65000 trips per annum. This comment does not consider the massive increase in trucking from the facility which would occur in and around Glebe island. This is also inappropriate and biased content for a noise assessment report.

In section 3.2, the statement is made that some Jacksons Landing buildings have been designed with façade noise attenuation measures to enable façade ship noise external level criteria of 63dBA. But these buildings also contain operable windows and balconies. In fact their facades are substantially glazed. Sound levels of 63dBA on a 24/7 basis (as is proposed) would therefore be intolerable for residents of these buildings unless it is considered fair and reasonable for all windows to be permanently shut, provided with sound reducing shutters and external open spaces never used. If facades are receiving noise at 63dBA, then waterside parks and public promenades would be exposed to higher noise levels as they are closer to the proposed facility. This is clearly an unacceptable and inappropriate situation for a residential area within 200-250m of a large industrial facility.

The major source of noise pollution for residents in Pyrmont is ship-generated noise, from auxiliary engines and systems. However, ship-berth noise levels are barely considered in this report. In section 4.3, It states that while the NPfl enables the implementation of a noise management precinct for ports, it does not specifically address the transient nature of ship noise, which once berthed has limited opportunity to adjust noise emissions at any time. This appears to be a convenient means to wave away these very significant and prolonged noise levels experienced by residents.

Whilst ship noise is recognised in the EIS, there are no serious measures taken to mitigate this issue because this “activity is recognised as a continued use of the existing port facility 24 hours per day, 7 days a week”. However, the last major port activity was in 2008 (car carriers) and since then significant residential development has taken place in close proximity to the proposed facility. There are very real health implications for all the residents being exposed to this noise, which the noise impact assessment ignores. This is clearly unprofessional and unacceptable.

*NPfl section 3.1 requires Hanson to consider feasible and reasonable noise mitigation measures. In relation to ship noise, Table 13, (page 24) in appendix D shows sound power levels of 106dBA for a vessel in “service operating condition” at berth. The World Health Organisation (WHO) recommends that the maximum recommended noise dose exposure levels for 106dba is 3.7 minutes per 24 hours (see link <http://www.noisehelp.com/noise-dose.html>). Yet the proposal and its neighbor (the proposed MUF) could see ships continuously at berth due to the proposed 24/7 operating hours of both facilities, resulting in potential exposure of **1440 minutes per 24 hours!** In the case of berthed ships, there is very limited opportunity (and no apparent interest) to mitigate or control such noise. Clearly, this level of uncontrollable noise represents a serious health risk based on WHO recommendations.*

The noise level of the ships’ engines at night would therefore be constant and unavoidable and would cause sleep disturbance injurious to health. There is substantial evidence that sleep disturbances lead to weight gain and mood changes in the medium term and to reduced glymphatics function – leading to degenerative brain disorders including dementia, mental health disorders and obesity.

The statement on page 29 of the appendix that “Hanson advise they will co-ordinate with ship operators to ensure ship engines and ventilation systems are minimised where feasible and reasonable to do so” carries no weight whatsoever. Experience shows, as previously admitted by Port Authority representatives, operators of port facilities at Glebe Island have little or no control over the ship operators. The statement amounts to little more than a platitude.

Further, the Impact Summary (page 32) states that “due to the proximity between GIB1 and Pyrmont receivers, port facility noise levels may exceed noise planning goals” For the word “may”. One could reasonably use the word “will”. The conclusions regarding ship-at-berth-noise levels as being “generally consistent with existing use and associated noise environment” are totally rejected by the majority of the Pyrmont community as well as incorrect. In fact, the impacts on neighbouring residences would be severe and potentially catastrophic, especially when the cumulative effect of the two adjacent facilities is considered.

Summary

The SLR noise impact assessment contains biased statements in favour of the proposal and contains highly technical analysis of predicted/modelled noise issues in an apparent attempt to obfuscate reasonable analysis of actual noise impacts. Such analysis appeared much simpler in the measurements of actual ship-generated noise by the Port Authority commissioned report by SLR Consulting on the CSL Reliance, which has been omitted from the noise impact assessment. In that report, engine noise generated by a cargo ship berthed at GI /2 was measured as being significantly higher than EPA limits and therefore productive of sleep-disturbance disorders. This earlier report is likely to be a much better guide to real noise levels generated by ships berthed at the Hanson Concrete Plant, than the verbose but deficient material presented in the EIS.

Please note the following principles relating to noise which appear in the Glebe island and White Bay Master Plan 2000

2.10.2 Noise Principles

- No marked increase in noise levels for residential areas surrounding the Port facilities.

Noise Assessment Criteria

At level of 53.2 dB(A) measured indoors corresponds to a conservative level of 65 dB(A) measured outside the bedroom window assuming windows are open for ventilation. The report adopted a criterion which would ensure that 90% of the population (including the aged) are protected in their sleep an emergence level (Lavmax or L1) of 65 dB(A). This criterion applies to short-duration noises which may occur at night from the operation of the port. **For continuous, steady or quasi-steady noise, recent**

evidence suggests an Leq of 40 dB(A) be used as an upper limit for assessment of sleep arousal inside bedrooms.

Comment: The proposed upper limit for assessment of sleep arousal inside bedrooms suggests that levels measured outside bedroom windows need to be considerably lower than 65dBA regardless of whether sound attenuation measures have been applied to façade design or not. Consequently, the proposal does not appear to comply with this criterion in the master plan.

*With a predicted Sleep Disturbance Noise Level at Evolve of 64dBA and measured noise levels considerably higher than this level (June 2017 SLR Consulting noise monitoring report for CSL Reliance at Glebe Island Berth 1 which demonstrated that the **CSL Reliance exceeded night time noise levels at Pyrmont by up to 8dB**) it would not be possible to achieve an Leq anywhere near 40dBA, as required in the master plan.*

Clearly ship-generated night-time noise levels would be well above both EPA limits and levels prescribed in the current master plan despite the platitudes in the EIS. This alone should result in refusal of the application on environmental grounds.

(EIS) 5.8 Transport and Accessibility

A Traffic Impact Assessment of the proposed development on surrounding road network has been undertaken by AECOM. The assessment includes an assessment of both the construction and operational traffic, including cumulative impacts. A copy of the Traffic Impact Assessment is provided at **Appendix H** of this report and a summary of the assessment's findings is provided below.

5.8.2 Operational Daily Trip Generation

Based on predicted daily trip generation of three vehicle types including employee vehicles the peak hour trip generation rates are provided in Table 14 below. Predicted trip generation resulting from the proposed development has been assessed as approximately 189 vehicles (in and out) and 98 vehicles (in and out) during AM and PM peak hours respectively.

Comment: These numbers do not reconcile with the numbers provided in Section 3.0 of the EIS (refer comments to 3.2.2 & 3.2.3). Section 3 states that, under peak conditions 120 concrete truck deliveries per hour can occur. This would equate to 240 concrete truck movements (in/out) per hour. So, concrete truck trips alone would be significantly higher than the figures provided in Table 14. This throws into doubt the veracity of all AM/PM hourly peak time truck movement figures (132/48 concrete truck trips) provided in Table 14 as well as any conclusions relating to impacts drawn from those figures.

Combined with other proposals such as the existing cement storage facility at Glebe Island, the proposed Multi-User Facility and West Harbour Tunnel support facilities, it is obvious that very large numbers of trucks will be required to service these facilities. It is NOT appropriate to consider the traffic implications of each project on a standalone basis. The AECOM traffic impact assessment appears to have done exactly that and consequently substantially understates the potential traffic consequences for the precinct.

It is claimed that a benefit of the two proposed facilities (Hanson & MUF) is that the "import of dry bulk materials by sea brings significant environmental and social benefits for Sydney by minimising road congestion, air pollution and road maintenance costs arising from truck movements on roads". Such claims that the removal of large numbers of long-haul movements per annum from congested arterial roads are both dubious and contestable and need to be considered in the context of all traffic consequences. In fact, the movement of trucks in and out of the Glebe Island sites would effectively centralise a much higher number of truck movements at the heart of Sydney where the roads are already clogged, due to the enormous size and throughput of the proposed facilities. The net result is likely to be much worse in relation to impacts on road networks and other road users in and out of Glebe Island. Why is this potential outcome not considered in a supposedly professional assessment?

Putting all statistics to one side, it simply does not make sense to have truck movements concentrated in a single pivotal area where massive public funds are already committed to road system upgrades; close to the CBD and some of the most densely populated suburbs in Sydney; in an area where the State Government hopes to encourage investors attracted by the visions announced in the Bays transformation Plan 2015.

5.9 Marine Traffic, Navigation and Safety

The proposed development will include the lease and operation of an existing deep-water berth (GLB1). GLB1 is owned and managed by the Ports Authority of NSW and will continue to be managed on behalf of the Ports Authority of NSW in line with their Standard Operating Procedures. The number of maritime movements to GLB1 as a result of the proposed development is consistent with the number maritime movements previously approved by the Port Authority of NSW. As such, there will be no additional impacts associated with the proposed development when compared to the Port Authority of NSW's, and the NSW Government's current approvals and long-term vision for Glebe Island's operation as an operational deep-water port within a working harbour.

Comments: Arguably, historic approved ship movements along this side of Glebe Island are no longer relevant in view of these two factors:

- 1) Significant residential development now situated opposite the proposed site at the northern end of the Pyrmont peninsula*
- 2) Intensification of Johnstons Bay as a waterway connecting Rozelle Bay and Sydney Harbour*

The statement regarding lack of additional impacts associated with the proposal is disputed, particularly when considered in context with the adjacent MUF proposal. Under these two proposals, ships berthed at the southern end of the existing wharf would block much of the existing narrow channel (through the old Glebe Island bridge) that links Rozelle Bay to Johnstons Bay, resulting in issues of public safety in marine traffic on this waterway. Yet these risks are not adequately addressed in the EIS.

In fact, Johnstons Bay has become a marine thoroughfare with an ever-increasing level of traffic involving boats of all shapes and sizes – from ferries, superyachts, barges and fishing boats to sailing yachts, dragon boats and kayaks. Marine traffic through this narrow nexus will undoubtedly continue to increase as the Sydney Fishmarkets and adjacent development in Blackwattle Bay take place.

In this context, claims relating to GI1&2 having ongoing status as deep-water ports to support industrial facilities - when there has been no sustained port-related activity here since automobile deliveries by ship ceased in 2008 - fly in the face of the reality of changing times, changing plans, and changing context. In my view, GI 1&2 are no longer appropriate or acceptable locations for the proposed facilities, which involve multiple bulk cargo ships (up to 3 at a time) maneuvering in the waterway and occupying berths on a 24/7 basis.

If the proposal is approved, the likelihood of serious marine accidents in this increasingly-congested waterway would be high.

5.10 Heritage

5.10.2 Heritage Impact of Development on Surrounding Heritage Items

The Site is separated from the Glebe Island Silos by approximately 120 metres and is thereby not considered to impact the significance of these structures. The proposed aggregate silos will be substantially lower than the Glebe Island Silos and as such will not dominate the heritage listed silos.

Comment: I understand that the existing Glebe Island Silos are approximately 43m high, whereas the proposed Hanson silos are 34m high. It is debatable that this represents a substantial difference in height. In any case the sheer size of the proposed facility (in both area and height) will, in my view, clearly have a negative impact on views of both the Glebe Island Silos and the Anzac Bridge. This represents further non-compliance with the Glebe Island and White Bay Master Plan 2000 which states, amongst its principles “Maintain existing views to landmarks (Figure 8) to reinforce the diverse visual quality of the area”.

The proposed development is also physically separated from the Glebe Island Bridge and as such will have no direct physical impact on the heritage item.

*Comment: This statement is clearly incorrect because the proposed development is immediately adjacent to the Glebe Island Bridge. By inference, it **will have a direct physical impact on the heritage item**, as it will both tower above it and dominate its presence.*

5.18 Lighting

5.18.1 Proposed Design

The lights will be directed down, producing no light spill outside the Site boundary. Lighting would be of sufficient brightness to achieve night time work safety requirements and security on site. To minimise lighting issues, open deck lighting with multi-zone functionality, standby operations and as discharge operations are recommended. The Visual Impact Assessment Report makes the following recommendations for the lighting system:

- Directional flood LED lighting for mooring decks (controllable / variable for mooring operations and discharge to variable level of lighting) (Zone 1)
- Ambient local lighting for main deck areas (controllable / variable to meet local requirements to various Lux levels as required) (Zone 2)
- Ambient local lighting for accommodation open decks (controllable to 2 levels only) (Zone 3)
- Directional flood LED lighting for LSA areas (raft and boat) (Zone 4)

5.18.2 Assessment

Outdoor lighting at the Project Site would be limited to vehicle parking and driveway areas, with all lights directed down, producing no light spill outside the Hanson lease boundary. Ships would be lit when berthed during the night.

Lighting would be minimised with controllable and dimmable open deck lighting, with multi-zone lighting control to allow work within different areas of the ship without excessive lighting. Some directional flood lighting would be required but would be minimised to mooring decks and light sensitive areas (raft and boat).

Comment: As with noise, ship lighting would be a significant source of light pollution. It is unlikely that satisfactory controls could be successfully applied to ship lighting.

The impact of night lighting on the surrounding areas was assessed using the Landscape and Visual Impact Assessment Report. The eight observer points nominated to assess visual impacts within the visual catchment study area were also used to assess night lighting impacts. While no detailed design of the lighting system is available at this stage, the assessment undertakes a high-level review to ascertain likelihood of a change to night lighting in the locality. The visual impact matrix was used to examine sensitivity and magnitude to determine potential lighting impacts on nearby receivers. Table 17 below provides a summary of the assessment findings.

Comment: Table 17 shows that Pymont locations (locs 6&7) are assessed as having a moderate-to-high magnitude of sensitivity, visual effects, and night lighting impact. The location closest to most of the waterfront Jacksons Landing apartment towers is rated as high on all 3 scales. This cannot be regarded as acceptable in an established residential neighbourhood.

5.21 Cumulative Impact Assessment

Comment: Generally, EIS assessment of the three main areas of consideration for cumulative impacts (air quality, traffic and transport, and noise) has concluded with statements indicating negligible impact. It is therefore predictable that the EIS also finds cumulative impacts to be benign or negligible. As per the individual areas, I believe that the conclusions on cumulative impacts also involve strategic manipulation of significant issues and data.

6.0 Mitigation Measures

Comment: As a general comment to this section of the EIS, this review makes it clear that many of the most significant impacts from the proposed Hanson Concrete Plant are not able to be effectively mitigated. This reinforces my opinion that the proposal is completely inappropriate.

7.0 Justification of the Proposed Development

In general, investment in major projects can only be justified if the benefits of doing so exceed the costs. Such an assessment must consider all costs and benefits, and not simply those that can be easily quantified. As a result, the EP&A Act specifies that such a justification must be made having regard to biophysical, economic and social considerations and the principles of ecologically sustainable development.

This means that the decision on whether a project can proceed or not needs to be made in the full knowledge of its effects, both positive and negative, whether those impacts can be quantified or not.

The proposed development involves delivery of an aggregate handling and concrete batching plant facility at Glebe Island. The assessment must therefore focus on the identification and appraisal of the effects of the proposed change over the Site's existing condition.

Various components of the biophysical, social and economic environments have been examined in this EIS and are summarised below.

Comment: The proposal, in my opinion, will produce intolerable and unacceptable environmental impacts on residents of Pymont, public users of waterfront parks and promenades in Pymont, and businesses located in Rozelle Bay which are accessed from James Craig Rd. Impacts which would significantly affect public health and safety. These costs far outweigh any benefits which might be gained from the proposed development.

This is a clear case of public vs private interests in an area where the public has been assured that major industrial redevelopment of Glebe Island will not occur. The project is clearly not justified, and the assessment must be made in favour of the public interest.

7.1 Social and Economic

If approved, the development will employ 67 full time employees and mitigate job loss in the locality from the closure of the existing Blackwattle Bay facility at Bridge Road, Glebe. It will also mitigate any concrete supply loss in the locality from closures of the above facility.

Comment: Employment of 67 employees and mitigation of concrete supply losses are insufficient justifications for this proposal in this location as these factors would also apply to alternative locations. It is incumbent on the proponent to select a site which is compatible with the principles of the Glebe Island and White Bay Master Plan 2000 as well as the rights of neighbouring residents to the peaceful enjoyment of their environment.

The proposed development has many economic benefits given strategic location in proximity to several large development projects including infrastructure project which are concrete intensive including WestConnex, The Bays District Area Renewal, Sydney Metro Project among others. The proposed development will ensure construction activities of these planned development and other future development currently in the planning pipeline progress without unnecessary delays due to potential concrete shortages.

Comment: If the proposal is refused, as it should be, an alternative site (such as Port Botany) would satisfy these objectives. This is also not a sufficient justification for this proposal in this location.

The location of the Site is also seen to enable the proposed development to operate more efficiently than other typical concrete batching plant and aggregate supply facilities across NSW. Much of the raw materials and aggregates required for the batching process will be delivered either by ship (aggregates) or by internal roads (cement from the neighbouring Cement Australia facility). The development will thereby ameliorate traffic generally associated with the delivery of concrete by concrete agitator truck from other batching plants. Reducing traffic impacts is considered to have a positive economic impact.

Comment: These justifications involve the same false logic in relation to claims to ameliorate traffic conditions that has been responded to elsewhere in this review. Such claims are clearly incorrect and appear to be deliberately misleading.

7.2 Biophysical

Section 5.0 of this EIS contains a thorough assessment of the likely biophysical impacts of the proposed development. The environmental risk assessment contained at Section 6.0 demonstrates that the proposed development will not result in any significant environmental impacts that cannot be appropriately addressed through standard conditions of consent or the current mitigation measures included at Section 7.0.

The environmental impact assessment of the proposed development has demonstrated that:

- All environmental impacts associated with the construction phase of the development can be appropriately managed and mitigated including any potential view impacts, operational traffic impacts, parking management, construction and operational noise impacts and air quality impacts;
- The Site is appropriate for the proposed use given its current zoning and land use activities that immediately surround the Site.

Comment: These statements are clearly disputed throughout this review and are dangerously inaccurate in my view.

7.3 Ecologically Sustainable Development

The EP&A Regulation lists 4 principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle;
- Intergenerational equity;
- Conservation of biological diversity and ecological integrity; and
- Improved valuation and pricing of environmental resources.

An analysis of these principles follows.

Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This EIS has not identified any serious threat of irreversible damage to the environment and therefore the precautionary principle does not prevent the approval of the proposed development.

Comment: This review disputes the above statement as being totally false for the many reasons advanced within it.

Intergenerational Equity

Inter-generational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The proposed development has been designed to benefit both the existing and future generations by:

- implementing safeguards and management measures to protect environmental values;
- facilitating job creation to mitigate job loss from closure of the other aggregate/concrete batching facilities in Bays District Area; and
- ensuring timely availability of adequate quantities of concrete for large development projects (WestConnex and Sydney Metro, large residential projects etc), essential to addressing forecasted housing demand and increasing infrastructure capacity in Sydney.
- Reducing traffic generation and associated environmental impacts through the use of shipping to transport aggregates to the facility instead of trucks i.e. reducing up to 65,000 truck movements per annum from the Sydney road network.

The proposed development has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long-term implications such as waste disposal, air quality would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this EIS and the appended technical reports.

Comment: In comparison to the development of new facilities at Glebe island which comply with the visions and possibilities in the Bays Precinct Transformation plan as they apply to the Glebe Island Destination, this proposal would be extremely detrimental to its environment and urban context. Admittedly, it would have some benefit in terms of replacing lost employment and convenient (to the operator) delivery of concrete and bulk aggregate. However, it would not reduce traffic impacts or net truck movements as incorrectly claimed but would significantly increase traffic issues. This, together with the many other significant environmental impacts identified in this review, would far outweigh any benefits to the general public – in this generation or any other.

8.0 Conclusion

The Environmental Impact Statement (EIS) has been prepared to consider the environmental, social and economic impacts of the proposed Hanson aggregate handling and concrete batching facility at Glebe Island.

The proposed development has been specifically designed to mitigate and ameliorate potential impacts that may be associated with developments of this type, including visual impacts, air quality impacts, traffic impacts, and noise impacts. Within the proposed development, the concrete batching facility (with the exception of the aggregate storage silos, the on-site office building and site parking area) is largely enclosed in a warehouse structure to further address the above impacts. As demonstrated by this EIS, the location of the Site will also offer several advantages to the various development projects proposed around Sydney CBD and inner west to further address and minimise impacts.

The EIS has addressed the issues outlined in the Secretary's Environmental Assessment Requirements (**Appendix A**) and accords with Schedule 2 of the EP&A Regulation with regards to requirements for EIS.

Comment: The EIS has the appearance of a professional and exhaustive document with equally wordy appendices. However, on closer inspection, the EIS appears to deal with many of the real social and environmental issues involved through a strategic combination of:

- *omission and devaluation of key factors;*
- *overly-technical jargon obfuscating significant issues;*
- *over-use of predicted outcomes in place of available measured outcomes of existing precedents;*
- *and trite, fallacious and convenient conclusions.*

Some of the information presented appears to contradict other information presented. Some of its conclusions and justifications appear to be self-serving and biased rather than balanced and impartial. The overall impression after reviewing the document is one of a well-orchestrated attempt to justify a pre-determined conclusion: that the proposed development is necessary, justifiable, lacking in adverse effect and appropriate. Unfortunately, it clearly is none of the above.

Given the merits described above it is requested that the application be approved.

Comment: The proposal clearly has merit in terms of the commercial objectives of its proponent. In every other way it would be extremely detrimental to all other parties in its vicinity and quite destructive of the visionary objectives for Glebe Island, for reasons detailed in this review. This site is not appropriate for this development as it does not align with the vision for the future or the provisions in the existing master plan. The proposal represents significant environmental risk and it would impact significantly on the health and well-being of the surrounding communities.

Against the claimed merits of the proposal, the following potential adverse effects need to be properly acknowledged, assessed, and weighed:

- *Appears to be part of an opportunistic and anachronistic attempt to re-industrialise Glebe Island and significantly upgrade its port functionality;*
- *Conflicts with the visions and objectives announced for Glebe Island in the Bays Precinct Transformation Plan 2015.*
- *Conflicts with many of the principles and provisions in the Glebe Island and White Bay Master Plan 2000;*
- *Proposes an over-scaled industrial complex sited in an inappropriate location*
- *Would create intolerable continuous noise levels emanating from auxiliary engines of berthed ships, which would exceed EPA limits, disrupt sleep, and adversely affect public health;*
- *Involves significant adverse effects on local air quality through airborne particulates;*
- *Would subject residents to continuous, sleep-disturbing artificial port- and ship-lighting;*
- *Would create significant public health and safety impacts in relation to existing marine traffic on the increasingly-congested Johnstons Bay waterway.*
- *Would involve large net increases in movements of trucks in and out of Glebe Island, with significant consequences for other users of James Craig Rd;*
- *Would create significant impacts on The James Craig Rd/Victoria Rd intersection and other local traffic accessing Victoria Rd, City West Link, The Crescent, and the Anzac Bridge.*
- *Would result in unwanted and disruptive visual impacts on existing heritage and landmark structures on and across Glebe Island;*
- *Involves inevitability that many of the environmental impacts would not be capable of effective management of mitigation*

ENDS

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