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Submission to the Independent Planning Commission

Glebe Island Concrete Batching Plant and Aggregate Handling Facility SSD 8544

I am writing further to the Commission's email of 28 May requesting submissions on further correspondence from the Department of Planning, Industry and Environment (the department) and the applicant/Hanson. Thank you for this opportunity.

Correspondence from the Applicant to the Commission of 17 May 2021

This letter states that "Hanson will load aggregate trucks on weighbridges located underneath the aggregate silos." It can be seen from the 'Western Elevation' diagram provided in the letter that this would be **outside**.

Note that page 31 of Hanson's original Environmental Impact Statement (EIS) states that "empty aggregate trucks will enter the Site from the northwest and circumnavigate the enclosed building and parking areas to arrive at the aggregate loading point **located inside the enclosed building**".

I include this to demonstrate that there have been constant inconsistencies between what Hanson has said at various stages of the application process. I am not confident that the department has properly tracked these inconsistencies so that it knows exactly what it has recommended.

(I note that there has been a further change in the proposal between Hanson's letter of 17 May 2021 and its letter of 24 May 2021, as discussed below.)

Photomontages from the Applicant

The adverse visual impact of the proposed plant would, by Hanson's own admission, be high. The Commission asked Hanson to provide updated photomontages. The pictures supplied by Hanson speak volumes about its approach to the entire application process. Take the following photo that purports to show the visual impact of the plant from Pirrama Park in Pyrmont.



This photo is totally misleading. It uses some kind of wide-angle lens that gives a false impression of the visual impact of the proposed plant. The plant appears to be a huge distance from the park, thereby diminishing its visual impact.

Compare Hanson's photo with a photo I took from the park with a standard lens and with a person in the photo to provide a sense of scale. This portrays the true proximity of the ANZAC bridge and the site of the proposed plant.



Applying the same scale to Hanson's photomontage, the true view from Pirrama Park would be as follows.



This version shows that the plant would have a highly negative impact on views from the park to the ANZAC bridge. Compare this photo with Hanson's wide-angle version above. The latter seriously understates a major problem with the proposed plant.

The same analysis applies to Hanson's photomontage of the view from the park on Bowman St. It appears as if the plant is a huge distance from the foreshore walk when in reality it is much closer and has a much more significant and adverse visual impact.

The misleading nature of these latest photomontages provided to the Commission by Hanson is an example of why local residents have become so cynical about both Hanson's analysis of its proposal and the department's unquestioning acceptance of that analysis in making its own assessment. It is particularly significant in this case because the adverse impact of the plant on views to and from the iconic ANZAC bridge is one of the proposal's greatest defects.

Letter from the Applicant to the Commission of 24 May 2021

Use of aggregate

Page 2 of this letter states that "it is intended that **the vast majority (if not all)** of the aggregates delivered to the site via ship would be used on-site at the proposed Glebe Island concrete batching plant". Compare this with page 11 of the EIS which states that the "two purposes" of the proposed Glebe Island plant would be "to act as **a shipping facility** that will support **a number of Hanson (and Hymix) concrete batching plants**" and to manufacture concrete.

This is yet another significant inconsistency. The EIS indicates that the plant would be a major shipping hub to supply aggregate to multiple Hanson and Hymix plants, but Hanson now tells the Commission that the “vast majority (if not all)” of the aggregate would in fact be for the Glebe Island concrete plant. Again, this is typical of material inconsistencies throughout this application process. Are the facts constantly changing or does Hanson say different things to different audiences?

Operating hours

The Commission asked Hanson to provide “Examples of other concrete batching facilities in the Sydney region that operate for 24 hours per day, 7 days per week”. Hanson’s response is as follows:

All of Hanson’s concrete plants in Sydney have **historically** operated 24 hours per day to meet market demands. Currently both Hanson’s Banksmeadow and Greenacre concrete plants are operating on a 24/7 basis. Most other concrete batch plants in Sydney have the **capability** to operate 24/7.

What does this answer mean? First, what happened “historically” is irrelevant. Historically, Sydney airport operated 24/7 but now it is subject to a curfew at night.

Secondly, Hanson only identifies two plants that are currently operating 24/7. I don’t know how many plants Hanson has in Sydney. A search on Google indicates 13 Hanson plants and 8 Hymix plants. Two out of twenty-one plants is **less than 10%**. It is hard to imagine that any existing plant is closer to such a large, densely populated residential area as the proposed plant would be to Jacksons Landing. The proposed plant would logically be the one least likely to be allowed to operate 24/7.

Thirdly, Hanson says “most other concrete plants in Sydney have the **capability** to operate 24/7”. Does that mean that they are allowed to operate 24/7 or that they are physically **capable** of operating 24/7? Even if the former, the use of the word “most” means that some of Hanson’s plants are not allowed to operate 24/7. Again, given the remarkably close proximity of the proposed plant to a high population area, if some plants are not allowed to operate 24/7, logically the same treatment would apply to the proposed plant.

Loading aggregate

Page 4 of Hanson’s letter says loading would occur “from the partially enclosed space underneath the silos”. This is a change from the previous week’s letter which had the loading occurring completely outside. It is remarkable that a multi-billion dollar international conglomerate has spent three years on this application and it is still a moving feast.

The uncertainty on this aspect of the plant’s operations is particularly unacceptable given that noise pollution has been an obvious and major issue from the outset. Is the department’s ‘assessment’ based on aggregate loading occurring from fully outside as per Hanson’s letter of 17 May or from “the **partially enclosed space** underneath the

silos” as per Hanson’s letter of 24 May or from “inside the **enclosed building**” as per page 31 of Hanson’s EIS? How can the department claim to have properly assessed the noise impact given the uncertainty and constant amendments?

Metal aggregate falling from a silo into a steel truck is extremely noisy. Surely local residents have a right to expect some precision when analysing this problem and some meaningful effort by the department to procure mitigation by the party causing the noise. Instead, the department’s response is simply to accept that there would be noise exceedances and to say that the solution is for local residents to keep their doors and windows shut 24/7.

If this application is ultimately approved, the loading of aggregate should be required to occur within an enclosed building (as Hanson originally proposed) and that building should be acoustically treated. Hanson should not be allowed to proceed with what is cheapest for it at the expense of the local community.

Maximum delivery capacity

The final point in Hanson’s letter is yet another example of the unsatisfactory nature of this application process. The department spent three years working on this application before issuing its detailed assessment and the ‘Recommended Development Consent’. Part F of the latter sets out very precise “Limits on consent”. Limit F3(a) states that “The operation of this use is restricted to a maximum of delivery of 1,000,000 million (sic) tonnes of concrete aggregates per annum”.

The volume of aggregates allowed to be delivered is obviously a fundamental number. It sets the parameters for the levels of noise and air pollution and road and water traffic congestion to be generated by the plant. But Hanson now seeks to have this limit substantially increased above the department’s recommendation by amending it so that it applies solely to aggregate delivered **by ship**.

This makes no sense. It would significantly increase the volume of aggregates that could be delivered because the new limit would become one million tonnes by ship **plus** the amount delivered by road. And there would be no limit set on the road deliveries at all. This would cause a corresponding increase in air and noise pollution and in road and water traffic congestion.

This cannot have been what the department intended. Why would the department have imposed a limit on deliveries by ship but not deliveries by road? That is completely counterintuitive given that one of the supposed benefits of the proposal would be to reduce road traffic by transporting aggregate by ship.

How can Hanson now request that such a fundamental constraint on pollution and congestion be amended at the final hurdle?

Letter from the Department to the Commission of 18 May 2021

Strategic context

The Commission asked the department to “provide some more detail regarding the coexistence of the proposal with potential future uses in the Precinct”. This is a fundamental question. The fact that the department’s reply is three short paragraphs, less than half a page, speaks volumes.

The department did not provide any detail to the Commission because it is impossible to reconcile a major and permanent 24/7 industrial plant on Glebe Island with the potential future uses of Glebe Island and the wider Bays West area. The industrialisation of Glebe Island, and the associated air, noise, and above all, visual pollution would self-evidently render the surrounding area unattractive for commercial, entertainment, recreational, and other uses. The residents of Jacksons Landing can attest that it would certainly rule out any residential development anywhere near the site. Few things can happily “coexist” with a dirty, noisy concrete plant.

As has been pointed out many times, the proposed concrete plant would make a nonsense of the purported rehabilitation of the old Glebe Island bridge and its use to connect a revitalised Pyrmont and the Sydney CBD with Bays West. The western end of the bridge is right beside where the department would allow Hanson to build a concrete plant. That would obviously impede any connection by cyclists and pedestrians from east to west.

The Hanson plant would seriously undermine most other development possibilities on Glebe Island for the next quarter century. It would be inconsistent with many of the department’s published plans and strategies and would carry a high opportunity cost economically, socially, and environmentally. It is no wonder that the department’s response to the Commission on this issue was so brief.

Height details

This is perhaps the most significant item in the recent correspondence received by the Commission. It goes to the crucial issue of the proposed plant’s visual impact.

Two figures stand out. The height of the ANZAC bridge deck “at the pylon structure closest to the proposed development” is 30.6 ms and the height of the aggregate storage silos would be 37.6 ms. That means that the silos would be 7 ms higher than the ANZAC bridge carriageway. That is a huge difference. The silos would effectively tower over the carriageway.

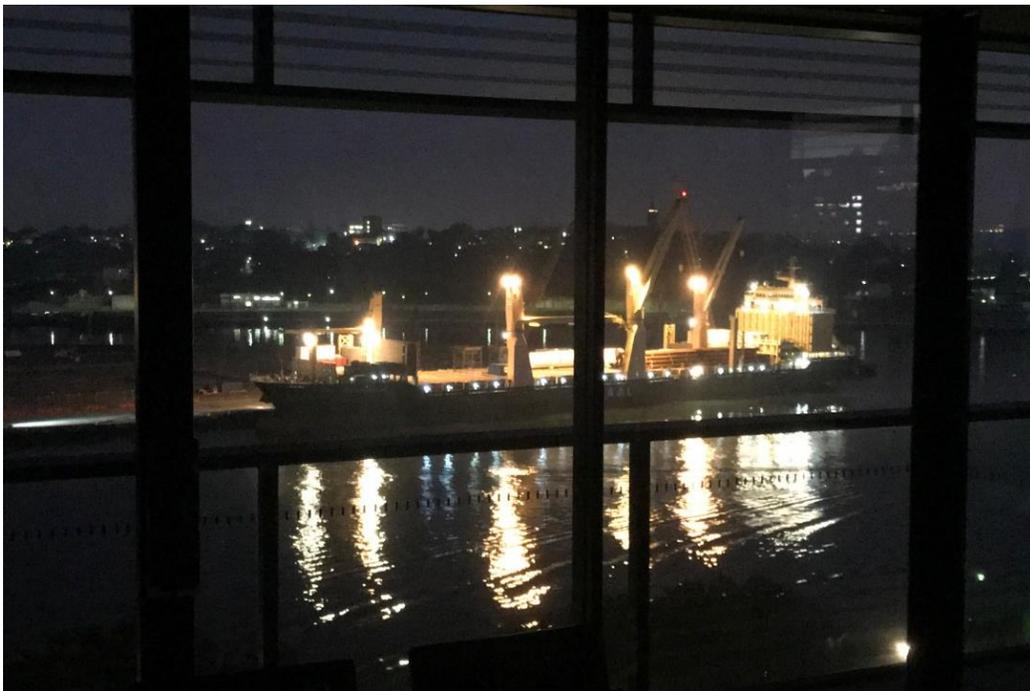
This height difference would be reflected in the major adverse impact of the silos on both views of the ANZAC bridge from Pyrmont, Balmain, Barangaroo, and elsewhere, and views from a large section of the bridge to Balmain, North Sydney, the Harbour Bridge, Barangaroo, the CBD, and Pyrmont.

Landscaping

The Commission sought “further assessment” of the visual impacts given that Hanson itself “has stated that it is not practical to provide landscaping of sufficient size/quantity to “screen” and “soften” the proposal””. In its response the department doubles down and reasserts that “the provision of a Landscape Plan was a key mitigation strategy”. This is very peculiar given Hanson’s own admission that that strategy would be largely ineffective. It begs the question as to how the department ever accepted the Landscape Plan as a “key mitigation strategy” given that its own review must have made it clear that the site does not in fact allow for any meaningful landscaping.

The department has not provided what the Commission specifically asked for, namely “further assessment of visual impacts”, particularly in relation to the silos. The only thing that the department refers to apart from the Landscape Plan is the Public Art Strategy. A Public Art Strategy is laudable, but it would not alter the large-scale visual obstruction caused by the proposed 37.6 m high, 80 m long silos. The department has no answer to that because there is none.

Note that neither landscaping nor public art could lessen the visual impact of Hanson’s vessels. This would be a problem night and day. Below is a photo, taken inside our apartment, of a ship currently berthed at the northeastern end of Glebe Island across from Jacksons Landing. It gives some indication of what 120 Hanson ships a year berthed at GI Berth 1 would mean for nearby apartments. A Hanson ship would be less than 175 ms from the Evolve Building, much closer than the ship in this photo.



Construction period

The Commission asked the department to confirm that it based its assessment on Hanson's proposed construction period of "18-24 months" and to provide any further comments, if necessary. The department's response is that it "based its assessment on the construction timeframe specified in the Applicant's EIS which states that construction would be undertaken over a six to nine-month period". In spite of the striking difference, the department provides no further comment.

This is just one more example of the inconsistency that has pervaded this application process. Hanson's EIS said 6-9 months. The department assessed, and approved, the impact of the construction on the basis of that duration. Other interested parties reviewed the proposal and made submissions on that basis. But now Hanson says the construction period would be 18-24 months i.e. three times as long. Again, how is this acceptable? Is Hanson not bound by anything it says? Does the department not care?