

## **REPORT: Our response to Hanson Concrete “Response to Submissions”**

Subject: **SSD 8544 Glebe Island Concrete Batching Plant and Aggregate Storage Facility**

This report has been prepared in response to the Response to Submissions (RtS) dated 11 December 2019 prepared by Ethos Urban on behalf of Hanson Construction Materials Pty Ltd (Hanson). Our purpose is to object to the RtS and to demonstrate how woefully inadequate it is in addressing both the concerns of the 194 objecting submissions and the matters raised by the Department for Planning, Industry and Environment (DPI&E) itself.

The topics covered are as follows: -

### **General criticisms**

- *Reliance on the evidence of non-independent experts*
- *Unacceptable uncertainty*
- *The fallacy of ‘business as usual’*
- *The conflicted relationship with the Port Authority*
- *Hanson’s bad track record*

### **Specific problems**

- *Unacceptable noise pollution*
- *Unacceptable 24/7 operation*
- *Unacceptable air pollution*
- *Horrendous visual impact*
- *Open-ended lease duration*
- *Ignoring the Bays Precinct Transformation Plan*

### **General criticisms**

The RtS is just an exercise in advocacy and self-justification. Rather than offer any meaningful mitigation of the raft of adverse environmental impacts from the proposed project, the RtS simply denies, downplays or ignores those impacts.

#### ***Reliance on the evidence of non-independent experts***

The denial and the downplaying are facilitated by a range of captive experts who champion the case of their paying client. 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. Has the DPI&E undertaken an independent review of the technical analysis of contentious issues like noise and air pollution in the EIS and RtS? Has it engaged its own acoustic and air quality engineers? Or is it simply relying on Hanson’s paid advocates? Given the emerging scandal in Sydney of defective projects signed off by private certifiers paid for by developers, it

is essential that there is a proper independent assessment of the expert evidence behind Hanson's claims. Local communities have no technical expertise and we are relying on the DPI&E.

### ***Unacceptable uncertainty***

Even with all the 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'. Unfortunately, we know that when all the purported anticipation, prediction, and expectation turn out to be wrong, and the supposedly unlikely happens, it will be too late. Hanson will have locked in its twenty plus year concrete plant and Sydney will be stuck with all the environmental problems. And there will be no comeback against Hanson or its advisers.

### ***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 120 ships a year is just "a continued use of the existing port facility"; just business as usual. In other words, according to Hanson its large plant and associated massive increase in trucking and shipping would not represent any kind of change to the environment. There are so many flaws with this argument and yet it 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.

First, the site on Glebe Island proposed for the Hanson plant has been empty for years. It was last used on any ongoing basis twelve years ago when car imports were brought in through Glebe Island. It is fascinating to read the Wikipedia entry for Glebe Island. It 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 "until 2008" ([https://en.wikipedia.org/wiki/Glebe\\_Island](https://en.wikipedia.org/wiki/Glebe_Island)). Hanson attempts to justify what is clearly a major change of use by saying that the site "has been *underutilised* since 2008".

Secondly, the Hanson project would result in a huge escalation of shipping activity at Glebe Island wharves 1 and 2 (GI 1&2). Hanson says that the shipping volume would not exceed "historical numbers". This is disingenuous at best. Its historical numbers are from twelve years ago when Glebe island was last used for car imports. Since then only a handful of ships have berthed at GI 1&2 each year. Hanson is proposing 120 ships a year. It is misleading to run a "continued use" claim based on "historical numbers" and a "use" that ceased more than a decade ago.

The RtS also states that "the Glebe Island and White Bay ports are already operational 24/7". This is extremely misleading. The level of activity at GI 1&2, and particularly on the site of the proposed Hanson facility, has been minimal for many years. As noted above, only two or three bulk materials ships berth each year. 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. Most of this occurs in normal business hours and is small scale. To imply that GI 1&2 is "operational 24/7" is frankly dishonest.

Thirdly, the 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.

The example of Sydney Airport is very relevant to Glebe Island. From its commencement in 1933 until 1995 Sydney Airport allowed planes to take off and land at any time of the day or night. In more enlightened times, a curfew was introduced in 1995 to protect surrounding residents from the noise pollution. It would have been laughable to suggest in 1995 that unrestricted flights should have been allowed to continue simply because that had been past practice. "Continued use" was not a valid argument then and it is not a valid argument now.

Fourthly, the area surrounding the site of the proposed concrete plant has been transformed in the last twenty years. 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. Some of them are less than 200 metres away. The last high-rise apartment block was not completed until 2012. 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.

In summary, Hanson’s “existing use/continued use” argument does not stack up. It cannot be employed to deny and/or justify the adverse environmental impacts of this project.

### ***The conflicted relationship with the Port Authority***

There is a second fundamentally flawed argument in the RtS, namely 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 any 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 plant and berth ships at Glebe Island would all depend on its lease agreement with the PA. The PA would ensure, through that agreement, that there would be no adverse environmental impacts. The flaw in this argument is that the PA cannot be relied on to protect the environment or local residents because it is hopelessly conflicted.

The PA has two major conflicts. First, as the lessor, it would have an obvious financial interest in Hanson entering into the lease and paying the highest possible rent. It would not want to impose any restrictions on Hanson that would either dissuade Hanson from entering into 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. Self-evidently, 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.

This is a classic case of the poacher acting as gamekeeper. Based on our experience of dealing with the PA, local residents have absolutely no confidence that it would ‘supervise’ Hanson so as to prevent adverse environmental impacts. Quite the contrary.

We are particularly concerned that Hanson and the PA might enter into a long-term contract upfront that contains vague undertakings and assurances from Hanson that the PA would never enforce. Take one example. The RtS refers to the proposed “noise management precinct”. It states that the PA will manage noise “across the entire noise precinct, enabling more efficient implementation of *reasonable and feasible* noise mitigation measures”. No doubt the lease between Hanson and the PA would reference the noise management plan. However, how likely is it that 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? No doubt the parties would agree between themselves that the relevant mitigation was not reasonable or feasible.

Our cynicism in this regard is heightened by the fact that the PA and Hanson are using many of the same experts for the MUF and the concrete plant e.g. 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 reality is that the MUF and the Hanson plant are almost joint projects. Accordingly, it is inconceivable to us that the DPI&E could contemplate consenting to Hanson’s project in reliance on the PA acting as the future policeman of Hanson’s activities.

We note in this regard that the PA is not exactly an ideal citizen when it comes to environmental compliance. The PA is subject to an environmental protection licence (EPL) in relation to some of its own

activities on Glebe Island – EPL 13008. The PA has breached that licence in ten years of its eleven year life, including by failing to meet noise limits.

We are very conscious that the NSW government owns the PA. However, we hope that the DPI&E will judge the Hanson project solely by reference to the appropriate ‘planning’ and ‘environment’ criteria and will not be influenced by extraneous political or financial considerations.

### ***Hanson’s bad track record***

The PA is not alone in breaching an EPL. From a cursory review of the website of the NSW Environment Protection Authority (the EPA), it appears that Hanson has breached one of its EPLs on at least eight occasions and has received at least six penalty notices from the EPA. It has also been fined by the EPA on two occasions, once for an alleged repeat air pollution offence (<https://www.epa.nsw.gov.au/news/media-releases/2018/epamedia180322-epa-fines-doyalson-concrete-plant-for-air-pollution>). Of greatest concern is the fact that Hanson has even been convicted in a criminal pollution case (<https://apps.epa.nsw.gov.au/casesapp/ProsecutionDetails.aspx>).

On the basis of this track record, Hanson should not get approval for this project. There is a clear danger that it would treat any fines or penalties imposed for air and noise pollution as just a cost of doing business.

### **Specific problems**

We cannot comment in detail on the entire RtS because of the highly technical nature of many of the issues, particularly air and noise pollution. Nevertheless, there are numerous flaws in the RtS that are self-evident even to the layperson.

### ***Unacceptable noise pollution***

#### *Noise levels*

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 Pyrmont, 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.”

We know from discussions with acoustic engineers that an exceedance of 8 dBA is enormous. It would have a disastrous impact on the lives of local residents. For Hanson and its advisers to dismiss it as insignificant is contemptible. For an Australian government in 2020 to allow it is surely unimaginable.

Our concern is further exacerbated by the fact that we believe that the noise levels used by Hanson may be understated because the RtS and the EIS do not appear to specifically address the source of the loudest noise, namely the arriving and departing of ships. Local residents know from experience that *far and away* the greatest noise pollution, and the greatest cause of sleep disturbance, come from the engines of ships and their tugs manoeuvring in and out of berths. Hanson’s documents refer generically to “shipping noise” and the focus appears to be on the noise from a berthed ship unloading. For example, there is a reference on page 3 of Appendix C to –

“the SWL (typical 106 dBA) is inclusive of significant noise sources based on 12,000 tonnes vessel capacity (ie engine, ventilation and the like) and the ship bow is orientated south, with the discharge conveyor feeding the hopper.”

There is no specific discussion or analysis of ship movements, and there is no mention of tugs. Local residents know from experience that tugs can be even louder than bulk materials ships. None of this appears to have been analysed. There is one reference to “ships docking” on page 3 of Appendix C but that is in a question raised by the DPI&E. Hanson’s response is completely silent on ships docking. Accordingly,

we are concerned that ship movements, especially if tugs are involved, would generate night-time exceedances of even more than 8 dBA. This is a truly frightening prospect given Hanson's projection of 120 ships per annum, or 240 ship movements.

We note that on page 2 of Appendix C Hanson states that "the predicted noise levels from vessels servicing the Multi-User Facility and the Batch Plant are less than historical noise levels". This is the weak 'business as usual' argument already discussed above. It seeks 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. This was before a major expansion in the population living directly opposite GI 1&2. We consider that argument disingenuous if not downright misleading.

#### *24/7 operation*

The noise levels from the Hanson project are related to another major problem, the 24/7 nature of the proposal. Not only would the residents of Pymont be subjected to a massive increase in noise pollution, but it would occur around the clock. This is a major point of contention for the local community. 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". Interestingly, this 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.

The response in the RtS is superficial and inadequate. It has three limbs. The first is as follows –

"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."

This is typical of Hanson's response to so many submissions, hedged about with 'possibly's and 'maybes'. Importantly, it provides no actual justification for a 24/7 operation. If this is all as uncertain as Hanson suggests, why couldn't Hanson simply organise its affairs so as to operate with a reasonable curfew? That would prevent the worst of the noise pollution and particularly the biggest problem, namely sleep disturbance for the people living in the 1,400 apartments across the water in Jacksons Landing, Pymont.

The second limb 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. The level of activity on the site of the proposed Hanson facility, and at GI 1&2 generally, has been minimal for more than a decade with only two or three bulk materials ships berthing each year and other minor activity involving small boats and barges. 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 limb 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. This arrangement would provide no certainty at all. Furthermore, 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 would have in relying on the PA to manage "the residential amenity of the surrounding areas".

In summary, nowhere in the RtS does Hanson provide 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.

This issue is particularly acute in relation to ship movements given their impact on sleep. We note in that regard that page 6 of Appendix J states that “Ship deliveries are expected three times per week and each delivery will last approximately 12 hours”. If each ship only needs to be berthed for 12 hours, a curfew on ship movements would clearly have no adverse impact on Hanson. Ships could arrive and leave between, say 7.00am and 9 .00pm. That would allow them more than the necessary twelve hours for delivery. It would also ensure that they would not need to stay overnight. This would avoid the second major cause of sleep disturbance, namely throbbing ship engines running overnight.

It is interesting to note that in an 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 the schedules of international aircraft can be organised to work around a curfew, surely the same is true of Hanson’s ships.

#### *Attenuation at receiver*

The only defence that Hanson offers to the excessive noise levels that its project would produce occurs on page 2 of Appendix C which states 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 local residents should be OK provided that they keep all their doors and windows shut all the time. 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. For example, Hanson’s attitude is why restrict our business in any way with an inconvenient curfew when we can pass the problem on to the local community.

The combination of night time exceedances of (at least) 8 dBA, no curfew, and 240 ship movements a year (400 with the MUF) 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. This would be an outrageous outcome. In Australia in 2020 people should be able to sleep with a window open to have some fresh air. We are concerned that some of the parties involved in the proposals to redevelop Glebe Island do not fully appreciate the gravity of this situation and the distress that it is causing many Pymont residents.

It is also worth noting that many people in Jacksons Landing know from experience in winter 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 wake a person. That is based on the reality of lived experience not theoretical, ‘predicted’ noise assessments.

#### *DPI&E requests*

We note that the DPI&E put many detailed questions to Hanson in relation to the concrete plant proposal. We are not acoustic experts and therefore cannot judge all Hanson’s responses. Nevertheless, we are highly suspicious of many of them. They are at various times evasive, uncertain, dismissive, and overly optimistic. Inevitably, most of them fall back on variations of the same three discredited arguments – everything is just the continued use of an existing port, the apartments in Jacksons Landing are sound-proof, and the PA would ensure there are no problems.

One request of the DPI&E is of particular interest to the local community, namely 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 disrupt sleep. The Hanson response on page 9 dismisses these three noise problems in less than half a page. It does not appear to provide the evidence requested by the DPI&E “to support the claim that no corrections are required for annoying noise characteristics”.

### ***Unacceptable air pollution***

Air pollution is another highly technical issue. This makes it difficult for us to understand or comment on most of the air quality analysis in the RtS and the EIS. Once again, rather than analysing predictive models, we fall back on lived experience. We know that on the rare occasions when a bulk carrier like the Zambesi is berthed at GI 1&2, we can see and, if the wind is blowing in the wrong direction, smell and taste the fumes belching from its funnel. Fortunately, that has not been a material issue in Pymont for many years given the very infrequent berthing of bulk carriers at GI 1&2.

We are very conscious of the reports of Balmain residents about the awful air pollution generated by ships at the White Bay cruise terminal. Comparing the White Bay and Pymont situations is useful in understanding the scale of the environmental impact if the Hanson project was allowed to proceed. White Bay involves a relatively small number of cruise ships, almost all over the summer season, and very few of which stay overnight. That part of Balmain is not densely populated. By contrast the Hanson project would involve 120 ships (200 including the MUF) throughout the year and many of them staying overnight, sometimes multiple days, and thousands and thousands of trucks. This would occur opposite one of the most densely populated areas in Australia.

The grief and distress that air pollution has caused at White Bay would be insignificant compared to the impact at Pymont. No doubt Hanson's response would be that the people of Jacksons Landing would just need to shut all their doors and windows. That is patently not acceptable and would certainly not be the response of local residents. The parties involved need to recognise that the protest over White Bay would be nothing compared to what would follow 24/7 air pollution opposite Pymont.

The recent chronic air quality problem in Sydney following 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 seems inconceivable that the DPI&E would 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 has no real interest in mitigating the air pollution problem. We are troubled in particular by 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 DPI&E'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". It is obviously concerned solely about its cost structure and is not prepared to consider any meaningful mitigation. This is clearly unacceptable. It makes a nonsense of references in Appendix C to "industry best practice".

Shore to ship power would address both air and noise pollution. 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>.

If the Hanson project were to be approved, as a minimum the DPI&E should retain the capacity to require Hanson to use shore to ship power in the future.

### ***Horrendous visual impact***

There is very little that needs to be said about the adverse visual impact of the proposed Hanson project. There is no response from Hanson that could 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. No “Landscape and Public Art Strategy” would be able to hide that harsh reality.

An example of the appalling aesthetics of the plant is the wall of containers that Hanson proposes lining up on the waterfront. According to the EIS, “The shipping containers will serve as a sound and visual barrier to the batching plant from the east.” The use of a row of old containers to hide the even uglier plant demonstrates that Hanson is not prepared to make any sincere effort to mitigate the adverse visual impact of the plant. Similarly, the suggestion that the containers would act as a sound barrier proves that Hanson does not take noise mitigation seriously.

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, and 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? It would be an eyesore for international visitors arriving at White Bay or travelling by ferry to Blackwattle Bay. It would be a blight on the view of Sydneysiders strolling on the Pyrmont boardwalk and enjoying Pyrmont’s parks. Its 34-metre high silos would disfigure the elegant lines of the ANZAC Bridge.

The Premier Gladys 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.

The Premier is not the only person promoting the regeneration and development of Pyrmont as a vibrant and attractive destination; a westward expansion of the City of Sydney. Recently, the Western Harbour Alliance and the Committee of Sydney launched a range of ideas for Pyrmont. Those ideas included a major transformation of the north western shore of Pyrmont, including swimming and recreational boating, directly opposite the proposed site of the Hanson plant. The NSW Treasurer Dominic Perrottet attended the launch and said that “if we work together we could really transform this area for the better” (<https://www.smh.com.au/national/nsw/cable-cars-and-floating-bars-the-new-20-billion-vision-for-pyrmont-20191204-p53gss.html>).

Something does not add up here. The state government appears to be saying different things to different audiences. If the state government genuinely plans to treat Pyrmont as the gateway to the CBD (and not just facilitate the expansion of the Star casino), then it cannot allow a major reindustrialisation of Glebe Island.

### ***The open-ended lease duration***

On page 29 of the RtS Hanson contends that “placing an expiration date on any development consent associated with this application is not necessary”. How does Hanson justify this contention? As so often in the RtS, Hanson relies on the argument that it would be under the control of the PA. According to Hanson “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”. In other words, 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. The PA is hopelessly conflicted, and it might allow Hanson to remain long after other parties wanted the concrete plant gone.

In that regard, 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 our understanding that Hanson’s business case



for this project assumes a minimum term of twenty years. We are very concerned that if this project were to proceed without a fixed expiration date, the desired redevelopment of Glebe Island in 10-15 years might be stymied and the local community could be forced to suffer a concrete plant for 20-25 years.

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

### ***Ignoring the Bays Precinct Transformation Plan for Glebe Island***

Somewhat surprisingly, the RtS devotes considerable space to addressing the Bays Precinct Transformation Plan (the BPTP). Even more surprising are Hanson’s responses to some of the principles of the BPTP. It is worth examining those responses in some detail as 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.

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

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

It is not at all clear how continuing an existing facility would build on anything. It seems unlikely that escalating noise, air quality and visual pollution in the area to a new high 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 – *“This principle is not relevant to any specific development application.”*

Even the spin doctors that drafted the RtS could not spin this one. The reality of course is that Hanson, and the PA, are fearlessly pursuing self-interest and destroying public benefit.

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

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

The reality is that a concrete plant clearly does nothing to “realise the Precinct’s potential”. On the contrary it would be a retrograde step setting the area back for the next twenty years. Hanson’s investment would be solely directed at private profit at the expense of public amenity.

**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 – *“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.”*

It is difficult to comprehend how Hanson could suggest that its plans have broad acceptance from the public in the face of two hundred opposing submissions. It is also completely disingenuous of Hanson to describe its open ended twenty plus year industrial plant as utilisation on “an interim basis”.

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

Hanson – *“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.”* This project is in complete contravention of the laudable goal of unlocking public access to the Harbour’s edge, one of the greatest features of development in Sydney in recent decades. This development would lock the public out for decades.

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

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

The proposed development is of course inconsistent with this principle. It would prioritise planning for private spaces and would lock away for decades space that might otherwise have been used for public spaces. Its presence on Glebe Island would be a major blow to any redevelopment of the White Bay Power Station and no one should pretend otherwise. Organisations like Google would not want to locate anywhere near a long-term concrete plant.

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

Hanson – *“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. Glebe Island should be transformed along the lines of Barangaroo with mixed use housing supply, commercial activity and public spaces. Building a concrete plant there would prevent all that for decades.

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

Hanson – *“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.”*

Hanson’s proposal runs entirely counter to this principle. It is the antithesis of ‘great places and great spaces’. Once again Hanson relies 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.