

The Honorable Rob Stokes MP
Minister for Planning and Open Spaces
Parliament House
SYDNEY N.S.W. 2000

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

Dear Minister,

We are 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 our strong opposition to this project and to provide you with a copy of the detailed analysis of the RtS that we have sent to executives at the Department for Planning, Industry and Environment.

That analysis shows that the RtS is just an exercise in advocacy and self-justification. Hanson denies the self-evident adverse environmental impacts of its project and offers no meaningful mitigation for those impacts. The key points in our analysis are summarised below.

- *Lack of independent analysis:* Hanson has used experts to prepare both their EIS and RtS documents. All such experts are paid by Hanson, and far from independent. Has the DPI&E undertaken its own independent verification of the data and analysis presented by those experts?
- *Uncertainty:* 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’.
- *Ignoring the facts of the last decade:* Throughout the RtS, Hanson contends that operating a new plant making one million cubic metres of concrete per year and requiring 240 ship movements is “business as usual” for Glebe Island berths 1 and 2 and a “continuation” of a working port. This is a fallacy and should be dismissed as such.
- *Conflict of interest:* The NSW Port Authority cannot be relied upon to prevent Hanson causing adverse environmental impacts because it would be hopelessly conflicted, both as the recipient of lease payments under the Hanson lease and as the promoter of the Multi-User Facility which creates the same environmental problems.
- *Hanson’s bad track record:* Hanson has a history of breaching Environmental Protection Licences and even has a criminal record in New South Wales for pollution.
- *Unacceptable noise levels:* The noise levels contemplated are exceptionally high and would impact severely on the surrounding area especially at night. Nor is there any recognition of the noise made by tugs arriving at and departing from Glebe Island.
- *Unacceptable 24/7 operation:* This would be both unnecessary and unreasonable. As a minimum a curfew should be imposed between the hours of 9 p.m. and 7 a.m. particularly for ship movements.

- *Unacceptable air pollution:* Not enough recognition has been given to the air pollution which will be caused by large cargo ships berthed at GI 1&2, by the unloading of sand and cement, and by thousands of large truck movements each day.
- *Horrendous visual impact:* The Hanson plant, now including a wall of shipping containers along the waterfront, would be an undeniable eyesore on Sydney Harbour and there is nothing in the RtS to justify it or to mitigate it.
- *Open-ended lease duration:* Hanson wants no time limit on its approval because it wants a permanent facility. But it makes no case for such an arrangement and defends its request on the flawed grounds that the Port Authority would protect the environment.
- *Ignoring the Bays Precinct Transformation Plan:* There have been a number of NSW Government documents under this or similar headings. None have indicated a major escalation of ugly, noisy, polluting industrial activity on Glebe Island.

Our analysis exposes the absurdity of Hanson’s claim that its project “would not cause any significant environmental impacts”. The project should clearly not be approved.

If, contrary to the merits of this case, Hanson Concrete is allowed to proceed, you can be certain that from day one we will monitor, using independent experts, the air and noise pollution that it generates. We will protest vociferously and explore all possible remedies, including class action for financial loss, damage to health, and loss of amenity.

This government is rapidly acquiring a reputation for the wanton disregard of the rights and interests of its citizens. We refer in particular to the enormous damage to people’s lives and livelihoods caused by the construction of WestConnex and the new light rail, and the ongoing refusal to filter ventilation stacks. The latter will become a major cause of protest for the Western Harbour Tunnel and Beaches Link. The reindustrialisation of Glebe Island would represent another step in an unfortunate and growing trend.

Attached is a full Report responding to the Hanson RtS and providing details of our concerns.

We request a meeting with you as soon as possible to discuss these issues and to find an acceptable outcome.

Yours sincerely,

Christopher D Levy.

Chairman,

Jacksons Landing Coalition Inc

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Attachment: Our 10-page report “Our response to the Hanson “Response to Submissions””.

CC. Alex Greenwich MP, Lord Mayor Clover Moore.