10 May 2018

REVIEW of Environmental Impact Statement (EIS) for the proposed Hanson Construction Materials Pty Ltd Concrete Batching and Aggregate Handling Plant at Berth 1, Glebe Island

Note: In reading this review, text in black represents text extracted from the EIS (and in some cases the Glebe Island and White Bay Master Plan 2000) whereas text in blue represents the views of the writer.

Purpose of review:

1) compare development with visions and objectives in the:
- Glebe island and White Bay Master Plan 2000
- The Bays Transformation Plan 2015

2) review and comment on statements, assessments, claims, and conclusions in the EIS regarding environmental impacts and project justification.

GLEBE ISLAND

Mike Baird is quoted as saying (in his Bradfield Oration) less than 2 years ago "*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".*

"*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"* (extract from the DOP&E website).

HANSON EIS REVIEW

EXECUTIVE SUMMARY

Purpose of this Report

Development with a Capital Investment Value (CIV) above $10 million on land identified under Schedule 2 as 'Bays Precinct Site' is State Significant Development (SSD) for the purposes of the EP&A Act by way clause (8) of SEPP (State and Regional Development) 2011 (SEPP SRD). The CIV for the proposed development exceeds this threshold and so it is SSD.

Comment

The SSD classification is correct but should also apply to the MUF as there is sufficient tangible relationship between them.

Planning Context

Section 4.0 of the EIS considers all applicable legislation in detail. The proposed development is consistent with the requirements of all relevant SEPPs. The Site is zoned 'Port and Employment' under the *Sydney Regional Environmental Plan No. 26– City West (City West Plan)*. The proposed development is permissible with consent and meets the objectives of the subject zone.

Comment

The objectives and the visions for the Glebe Island Destination in the Bays Precinct Transformation Plan are overlooked in this statement. ***The proposed facility is clearly not compatible*** *with these plans for Glebe Island, especially when the scale of the concrete plant is considered. It is also not compatible with many of the principles and provisions in the Glebe Island and White Bay Master Plan 2000.*

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

Refer to comment above in relation to the Transformation Plan, to which it does not conform. The site 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

The 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

The stated 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. However, 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; and

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 w225.855 0 Td ( )278TJ /R8 11.0 11.04 Tf 61.1687(o)1.31968( )-124.4

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 facilitates 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

A total of 241 aggregate deliveries per day equates to 482 truck movements per day in/out of Glebe Island, or over 19 trucks per hour over a 24 hour period (or one every three minutes).

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 is easily available. 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 or does not seem to set out any completion criteria, nor any details about what will occur once the projects cease. 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 change it to a centre of commerce and innovation, while retaining a degree of maritime-related activity and some important landmarks. The fact 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 21/2 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 21/2 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.

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**. 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.*
- *There seems to be no consideration of added detriment to air quality from the additional road use over Anzac Bridge – both from vehicle emissions, but also contribution from the freight on board the trucks.*

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 NPfI 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 NPfI 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 near 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.

*NPfI 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.

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

Assuming that the existing Glebe Island Silos are approximately 43m high, in comparison, 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, objectively, 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 Pyrmont 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 which reinforced 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, will produce intolerable and unacceptable environmental impacts on residents of Pyrmont, public users of waterfront parks and promenades in Pyrmont, 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 inaccurate.

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 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*

In my view, the proposed Hanson Concrete Batching Plant and Aggregate Handling Facility has no real merit in terms of the public interest and must be refused.

The continued use of existing and expanded port facilities 24 hours per day, 7 days per week should not be at the expense of the health and well-being of local businesses and residential communities surrounding Glebe Island. Nor should it be at the expense of the strategic direction and vision for the future.