

## **Application Number - SSD 17\_8544, Hanson Concrete Batching Plant**

I write to lodge my objection to this proposed development.

I have been a Hanson shareholder so I can claim some affinity with the company.

I am fully aware of the commercial reality under which Hanson is operating i.e. the company is required to vacate its existing batching plants in Blackwattle Bay and Bank Street, at relatively short notice. With a dearth of convenient and locally available alternate sites and given the constraints of having to develop a \$22.2M facility it is little wonder that Glebe Island must look like the promised land.

However, as difficult as is the Hanson dilemma is, this does not justify the building of a massively scaled 1 million cubic metre (p.a.) concrete batching plant, operating 24/7, in close proximity to residential dwellings.

My major concerns are:-

- **Noise pollution**

Given that Hanson and Hymix currently operate concrete plants in Blackwattle Bay and Bank Street, I'm somewhat surprised that the noise consultants have not conducted any sound testing of these plants at radial distances comparable to those applicable to Glebe Island. Instead they have relied on "predicted noise levels" using the modelling software SoundPLAN version 7 noise prediction software. Refer page 22 of the SLR report. I'm sure the argument would be that the proposed plant is newer generation equipment and that measuring the existing plants would not provide a valid comparison. Even so in not testing the existing operations they have missed the opportunity to clearly demonstrate just how much quieter the proposed operation would be. So I wonder why they didn't think to conduct noise monitoring at these sites.

The report from SLR Consulting shows that noise monitoring was conducted at 1.5m above road level. I'm aware that this is the Australian standard, however overseas research shows that to evaluate the "*lived experience*" of externally generated noise within high rise apartment blocks it is necessary to make such evaluations in close proximity to where people are actually experiencing such noise. I would point out that it is no accident that there is a sub section of the building industry devoted to noise minimisation for high rise apartment buildings

- **Dust pollution/ship emissions**

On each occasion, during the unloading from vessels such as the CSL Reliance, a fine layer of dust has been deposited on my balcony. By way of reference, my apartment is approximately 32m above Bowman Street, Pyrmont and approximately 240m from the southern edge of Glebe Island as measured by my Pinloc3000IP Sureshotlaser.

The potential for such deposits increases with both Hanson and the MUF conducting simultaneous operations 24/7. Bland assurances that dust pollution will be minimised do not engender much confidence that this will truly be the case.

In addition ship emissions appear to have been disregarded in the Hanson EIS. To my mind ships have the potential to contribute significantly to air-pollution. The fact they will operate 24/7 whilst discharging cargo underlines this point, however with no recognition of the issue and no proposed mitigation, residents are expected to passively accept this situation. I think not.

- **24/7 operation**

The existing Hanson facilities operating at Bank Street (Hymix) and at Blackwattle Bay (Hanson) do so with a 6:00am to 6:00pm restriction. The notion that transferring these operations to Glebe Island automatically confers a 24/7 licence suggests a commercially driven decision which pays no regard to the needs of nearby residents of Glebe, Rozelle, Balmain and Pyrmont, to have uninterrupted night time sleep. i.e. peace and quiet!

- **Cumulative effects of the Hanson plant and the PANSW MUF**

The cumulative impacts of noise and dust pollution have been downplayed in both the Hanson EIS and PANSW's REF. The difficulty I have with the various consultant reports is that the consultants won't be around to assess the cumulative impacts should these proposals go ahead. Unless of course, in the future a court examines their reports and conclusions.

I can't find where the cumulative impacts of shipping operations have been properly assessed. The busy waterway that is Johnston Bay is a relatively narrow channel and to think that pleasure craft, passive boating, dragon boats and ferries will run the gauntlet of 15K-40K ton vessels in this waterway strikes me as an accident waiting to happen.

- **Approval Process**

The idea that the Hanson plant and the MUF being approved under differing approval processes begs the question as to why this would be so? Both facilities will be amongst the largest of their kind in NSW and the combined impact of their operations have not been properly assessed to my satisfaction.

In my opinion the Hanson proposal cannot be judged in isolation of the MUF. It is difficult to understand how the Hanson proposal can be adjudged State Significant whilst the MUF is subject to self-determination by PANSW.

Additionally it is difficult to understand how PANSW can lease land to Hanson on Glebe Island for a concrete/batching plant and for Hanson to be subject to a full EIS whilst at the same time a sublet MUF escapes such public scrutiny. The deferral of EPL's to a later date, to be sought by customers of the MUF looks like a sleight of hand.

Yours sincerely  
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