

Submission on SSD Application No. 17_ 8544 - Glebe Island Concrete Batching Plant

We object to the proposed Hanson Concrete Batching Plant ('HCBP') on Glebe Island and contest much of the analysis in the Environmental Impact Statement ('EIS') for the following reasons.

- On its own the HCBP would have major adverse health and amenity consequences for residents in neighbouring areas, particularly Pyrmont which is one of the most densely populated suburbs in Australia. Those consequences would be attributable to the noise, air, and light pollution generated by the plant. Despite what the self-serving and selective analysis in the EIS claims, the noise caused by the HCBP during the day would be detrimental to the lifestyles of local residents and at night would cause sleep disturbance with corresponding negative health implications. The most notable weakness of the EIS is its complete failure to address the issue of noise generated by berthed ships, the single biggest issue for most residents. We have a son with cystic fibrosis, a condition that causes severe respiratory problems. The dust caused by the HCBP and the fumes from berthed ships at such close proximity may have a deleterious impact on his health, and on people with asthma and other respiratory conditions in the area. It is deeply offensive to residents to suggest that the answer is simply to close all our doors and windows.
- The health and amenity consequences of the HCBP would be especially dire when combined with the effects of the proposed NSW Port Authority's ('PA') Multi-User Facility ('MUF') and, potentially, the West Harbour Tunnel construction site ('WHTCS'). The combined noise pollution in particular would make sleeping in the hundreds of Pyrmont apartments overlooking Glebe Island very difficult. The EIS does not properly address this cumulative issue. In particular, it fails to address properly a precinct noise management plan with the MUF and the need for cooperative mitigation.
- The HCBP represents a major reindustrialisation of Glebe island. This is entirely inconsistent with the actions of the NSW state government over the last decade and the long term plans for Glebe island and the Bays Precinct as evidenced by numerous publications and statements from the state government. The continuation of port activities on Glebe Island has always been contemplated but not the introduction of completely new 24/7 activities like a concrete batching plant. The proposed escalation in the nature and scale of activities on Glebe Island is not properly dealt with in the EIS. A 24/7 industrial plant is clearly inappropriate in this location and is at odds with the prior direction of development in this area.
- The scale of the HCBP would be inconsistent with its proposed location right beside the Anzac Bridge. It would ruin the view of the bridge from the public foreshore walks around Pyrmont. This would clearly not comply with either the Glebe Island and White Bay Master Plan 2000 or the Bays Transformation Plan 2015. The comments on this issue in the EIS are inaccurate and misleading.
- The escalation of activity on Glebe Island resulting from the HCBP would contribute to major road traffic congestion in the inner west and particularly in the link between the inner west and the CBD. This is not adequately dealt with in the EIS. The cumulative effect of the HCBP and the

MUF (let alone the WHTCS) would lead to gridlock around the Anzac Bridge. (We would have thought that major delays in the delivery of concrete to sites would be problematic from a concrete-setting perspective.)

- The berthing of ships at Glebe Island berths 1 and 2 on a 24/7 basis would cause serious congestion and disruption for boats going through the narrow channel under the Anzac Bridge i.e. the route between Johnstons Bay and Rozelle and Blackwattle Bays. This would significantly increase the risk of both personal injury and water pollution via accidents. This is not properly considered in the EIS.

Hundreds of residents in Pyrmont are concerned about the implications of the proposed HCBP and MUF. Perhaps most frustrating and depressing is the disingenuous nature of both the HCBP EIS and the MUF REF. It is self-evident even to a lay person reading them that they are advocacy documents rather than true assessment documents. To be fair to their authors, these documents are based on the information provided by the proponents – note for example the comment by Pacific Environment in Appendix I that its report “does not attempt to verify the accuracy, validity or comprehensiveness of any information supplied”. That comment speaks volumes and highlights the need for a comprehensive independent review.

The inadequacy of the EIS is best demonstrated by its flawed analysis of the crucial noise issue and in particular its failure to address the main problem – the noise of berthed ships. In recent years, Pyrmont residents have lived with the reality of cruise ships berthed at the White Bay cruise terminal and visits to Glebe Island by the CSL Reliance. Furthermore, many people are well aware of the reports carried out recently by SLR Consulting for the PA on the *actual* noise generated by the CSL Reliance. Local residents know *as an objective fact* that a large scale escalation of berthing ships at Glebe Island berths 1 and 2 would cause a major deterioration in their lives, including constant sleep disturbance. Nobody is fooled by an EIS (and REF) that focuses on onshore activities rather than ship noise, that utilises ‘predicted’ noise levels for its technical analysis rather than actual recorded noise levels, that argues that the exceedances are ‘negligible’, and that states glibly that noise is not a real problem because of the soundproofing of buildings in Jacksons Landing etc etc.

Pyrmont (and Balmain) residents are entitled to expect more honesty in this process. If the view of Hanson, the PA, and the state government is that, for the overall good of all Sydneysiders, Glebe Island should be reindustrialised so that concrete can be made in the center of the city using materials shipped directly by sea into the center, then they should say that upfront, properly acknowledge the extremely adverse consequences for local residents, and make a serious attempt to mitigate those consequences. Instead, we get self-serving reports that use selective analysis to contend that there are no major problems and that offer no substantive mitigation. Frankly, it is an insult to the intelligence of local residents and has been a major contributing factor to local opposition to both the HCBP and the MUF.

In conclusion, we believe that the proposed HCBP should not be allowed to proceed. If it is allowed to proceed, that should only occur if there is real and binding mitigation of the obvious problems. Mitigation as a minimum would include the following.

- A prohibition on the berthing of ships at Glebe Island berths 1 and 2 that generate engine noise and/or air pollution in excess of reasonable levels (such levels to be set by the NSW Environmental Protection Authority in consultation with interested parties including local residents).

- A ceiling on the number of nights on which ships could be berthed at Glebe Island berths 1 and 2 so as to provide respite for local residents (eg. 150 nights per year) and a ban on the weekend berthing of ships.
- A curfew on the onshore operation of the HCBP, including truck movements, from 11.00pm to 6.00 am. (If the city's most important infrastructure asset, Sydney Airport, is required to operate under a curfew for noise reasons, it is not unreasonable to expect something similar for less vital activities.)
- A proper precinct noise management plan with the MUF (and the WHTCS if it proceeds) so that the mitigation described here applies cumulatively to all developments on Glebe Island.
- The use of dark materials/paint for construction of the HCBP and strict limits on the level of lighting so as to lessen the impact on local residents at night.
- A formalised process for monitoring compliance with all mitigation conditions.

Obviously, mitigation along these lines would mean inconvenience and expense for Hanson (and the PA). However, the alternative, namely that the lives of hundreds of local residents would be blighted by severe noise and air pollution, and by major financial loss from the decline in value of their properties, is surely immoral and untenable.