


## Nicholas Hall - Submission Details for Brian Davies (object)

---

**From:** Brian Davies <lloyd8849@gmail.com>  
**To:** <Nicholas.Hall@planning.nsw.gov.au>  
**Date:** 10/29/2012 9:19 PM  
**Subject:** Submission Details for Brian Davies (object)  
**CC:** <assessments@planning.nsw.gov.au>

---

 Department of Planning

---

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Brian Davies  
 Email: lloyd8849@gmail.com

Address:  
 49 Monmouth St.,

Stockton, NSW  
 2295

Content:  
 Nicholas Hall - Planner  
 Mining and Industry Projects  
 Dept. of Planning and Infrastructure  
 GPO Box 39  
 SYDNEY 2001  
 Nicholas.Hall@planning.nsw.gov.au

28/10/12

Dear Sir/Madam

As a resident of Stockton for the past 12 years, please accept this submission of objection regarding Incitec Pivot's proposed ammonium nitrate plant on Kooragang Island (SSD-4986).

In my opinion the proposal creates an unacceptable impost on the quality of life because of various issues that are not addressed in Incitec's EIS. My main concerns are the additional noise, the extra traffic the fact that we have to live with a knowledge that even though the chances are remote, a devastating explosion is still a possibility. In addition, the possibility of further air pollution, water pollution point to the impacts on air to nearby residents and Incitec's Environmental Impact Statement do the fact that if this facility is still required for the mining industry it should be located in a sparsely populated area.

The possibility that two ammonium nitrate plants could be adjacent to each other and only 800 from residents is a worrying proposition and potentially a planning disaster.

The direct impacts from Incitec's proposal for me are:

### Air Pollution

The advent of the expansion of the coal loaders has already impacted on the amount of coal dust we seem to be receiving. The cumulative impact of the development and more is likely to impact on my future health. It may be coincidence but this year despite a flu injection I had the worst chest infection in my life. Further emissions of nitrous oxides from the proposed development on top of the nitrous oxides we already receive is just another cumulative impact. I think with the impacts we already have that residents are justified in demanding that air filters be fitted to their homes by those causing the air pollution and also contribute to the annual running costs.

### Noise Pollution

Industrial noise, especially night-time noise is already a major concern which impacts me. Incitec's EIS noise monitoring of the site was conducted when Orica's ammonia plant was not even in operation and proved that Orica is not meeting acceptable noise levels.

Furthermore, Incitec in their EIS, argue that "it is appropriate to relax the recommended levels for suburban areas by 5db".

Here are some extracts taken from different sections of Incitec's EIS on Noise.

"As the existing level of industrial noise exceeds noise amenity criteria recommended by the EPA's Industrial Noise

Policy (INP) by a significant margin, alternate operational noise criteria has been nominated for the Project. "Whilst the appropriate zoning in Stockton is recognised as suburban, considering the adjoining industrial zoning it must be noted that a suburban/industrial interface exists. The Industrial Noise Policy, does not provide recommended industrial noise levels for suburban/industrial interfaces and therefore it is considered appropriate to relax the recommended levels for suburban areas by 5db.

"Given that IPL and Orica are the only two operators that could materially influence industrial noise, it's proposed the adjacent sites assume an equal responsibility in achieving the nominated levels."

As a resident personally affected by noise from Orica and PWCS, I find the assertion of Stockton being an 'interface' suburb offensive and the idea for government to 'relax' noise limits completely absurd.

How can industry be trusted when Orica are well above night-time noise limits and Incitec are requesting special considerations?

Incitec have already indicated that noise will be an issue. If development was to be allowed then Incitec should pay for the fitting of noise reduction technology such as wall insulation and special glass to houses most affected.

Potential for explosion

Incitec's EIS fails to adequately address my concern around the potential risks of storing 21,500 tons of ammonium nitrate (maximum storage capacity combining Orica and Incitec). The blast contours in Incitec's EIS do not even reach Stockton, yet it's well known an ammonia nitrate explosion involving just 300 tons of ammonium nitrate in Toulouse, France, killed 33 and injured thousands within a 5km radius in 2001.

I am aware that ammonium nitrate is an oxidising agent, not an explosive, however, it can be turned into an explosive both quickly and easily by shock waves, for eign matter, heat and pressure. Whilst the risk of explosion is small, the impact of an explosion would be catastrophic and despite slogans in Incitec's EIS of "world's best practice" accidents do occur, take for instance Orica's Hexavalent Chromium leak in 2011.

One of the fundamental responsibilities of any Government is the welfare and protection of people and this proposal undermines the safety of around 50,000 residents within a 5km radius. Government should note that if Incitec proceeds there is enough explosive power on Kooragang Island to match the Hiroshima atomic bomb (Hiroshima used 18,000 tons of TNT which is comparable to the 21,000 tons proposed by Incitec and Orica's current capacity).

The Department of Planning must also acknowledge that the South Australian Government is trying to shift Incitec's storage of AN in Port Adelaide due to explosion risk for residents, which is outlined by a SA WorkCover report. Such a massive concentration of ammonium nitrate storage with 800 m of residents is not acceptable to the communities that surround the proposal.

Impacting house prices

The recent Orica pollution breaches has already impacted on the reputation of Stockton as a desirable place to live. Incitec's EIS fails to address my concern that a second ammonium nitrate plant may impact house prices. If Incitec's development is approved, the risk profile increases for all suburbs close to Kooragang and it's highly likely that the value of properties may decrease. Downward pressure on properties would be a direct result from fewer new families moving into areas like Stockton and a reputational stigma for suburbs closest to two ammonium nitrate plants.

Incitec's EIS does not acknowledge this issue, nor does it address who would be responsible if property values were lowered by their Project.

Traffic Impacts

Traffic is already a major problem as a result of industrial activity on Kooragang Island. Incitec's EIS does nothing to mitigate future traffic problems during construction and its operational phase.

In addition to congestion, the extra diesel truck movements will add to dangerous carcinogenic fine particles and nitrous oxides levels.

Employment and economic impacts in Newcastle and Lower Hunter

If operational, Incitec's plant will employ just 60 people, many of whom will be transfers from the company's Mooranbah ammonium nitrate plant. Considering the risk and impacts the plant brings to tens of thousands of people, 60 jobs are not commensurate with the more obvious and insidious impacts the plant will bring.

Furthermore, Incitec have stated that rising construction costs and a falling coal price has forced a two year delay in making a decision on this Project. These outside economic forces impact the viability and longevity of the plant and should be included in EIS.

Given that Incitec has announced that they will not proceed with the development of a plant for the immediate future it seems unwise to grant approval for the plant at this stage but rather review it at the time when they wish to proceed.

By the time Incitec wish to proceed, other issues may in fact be relevant.

Polluting the Hunter river

Excessive industrial development with a licenses to pollute the river close to a RAMSAR area is not common sense planning, nor does it position the Hunter River in a positive light to tourists.

As a submission maker, I can confirm that I have not made a political donation totaling \$1000 or more in the past 2 years.

Yours Sincerely,

Brian Davies,

IP Address: 58.108.147.39.optusnet.com.au - 58.108.147.39  
Submission: Online Submission from Brian Davies (object)  
[https://major.projects.affinitylive.com?action=view\\_diary&id=43318](https://major.projects.affinitylive.com?action=view_diary&id=43318)

Submission for Job: #4986 SSD-4986, Incitec Ammonium Nitrate Manufacturing Facility Project  
[https://majorprojects.affinitylive.com?action=view\\_job&id=4986](https://majorprojects.affinitylive.com?action=view_job&id=4986)

Site: #2546 Incitec, Kooragang Island  
[https://majorprojects.affinitylive.com?action=view\\_site&id=2546](https://majorprojects.affinitylive.com?action=view_site&id=2546)

**Brian Davies**

E : lloyd8849@gmail.com

---

Powered by [AffinityLive](#): Work. Smarter.