

29 September 2023

Mr Brent Devine
Department of Planning, Industry and Environment

By email: brent.devine@planning.nsw.gov.au
And via the NSW Planning Portal

Re: Submission, SSD-14082938 St Philip's Christian College Arizona Rd Charmhaven

Dear Mr Devine

Thank you for the opportunity to review this proposal, we offer the following comments.

Air Quality Impacts:

We are unable to locate any assessment of potential air quality impacts created by the proposed land clearing, excavation and construction works. The works have potential to generate particulate matter. Adverse health effects can occur with any increase in particulate pollution and there is no threshold at which health effects are guaranteed to not occur. The site is surrounded on three sides by residential properties and workplaces.

Management of particulate matter emissions must be proactively planned and effectively implemented, to ensure that the health and wellbeing of the community is not at risk.

Should the development proceed, appropriate consent conditions should be applied to ensure that potential air quality impacts are assessed and effectively managed, so that the community is not adversely affected.

Noise and Vibration Impacts:

The Acoustic Assessment (RAPT Consulting) indicates that excavation and/or building works will exceed noise management levels in some locations (p44). Effective mitigation measures should be applied so that the surrounding community is not adversely affected. We seek confirmation that the acoustic assessment, including proposed mitigation measures, is to the satisfaction of the appropriate regulator.

We request consideration be given to consent conditions addressing the following:

- The proposed Construction Noise Management Plan including appropriate noise and vibration impact mitigation measures, should be prepared prior to works commencing and implemented, to the satisfaction of the appropriate regulatory authority.
- affected receivers should be consulted over works programs, rather than being notified (EIS p142, Acoustic Assessment p44). The objective should be to establish works programs that create the least possible disruption to the community, noting the project hours of work will overlap with hours of occupation for both residential and non-residential premises.

Non potable water

The use of rainwater tanks (EIS p176,) including for toilet flushing (EIS p188) is proposed. Any recycled water use, including rainwater, must be the subject of an appropriate risk assessment and all necessary approvals must be obtained. All non potable water outlets must be provided with warning signage and fittings to prevent accidental ingestion. Consent conditions are requested to this effect.

Site Contamination and Hazardous Materials:

The Detailed Preliminary Site Contamination Assessment (RCA) (DPSCA) identified contamination comprising illegally dumped waste including asbestos, and PFAS concentrations within soil and water in the vicinity of the RFS premises boundary. The DPSCA notes the site can be suitable for use as a school subject removal of all waste and redesign of the school layout in the area of PFAS impact, or remediation. A remedial action plan is required (p ES2). PFAS levels in soil samples exceeded at least one human health criteria (p26)

We seek confirmation that the DPSCA including recommendations, and future Remedial Action Plan are to the satisfaction of the appropriate regulator. We request that consent conditions are applied to support the DPSCA recommendations (if appropriate), and to ensure that known contamination and any unintended finds are managed to avoid risk to human health.

Contact with Nature

Research indicates human health and wellbeing benefits are associated with contact with the natural environment. We note the site contains native vegetation and that retention of trees is planned, including for use as play spaces (EIS p36). We support maximum retention of native vegetation and replanting with native species to enhance the opportunity for students to interact with the natural environment, and request that consent conditions be applied.

Aviation

The EIS (p180) notes potential impacts on aviation operations at the adjacent RFS premises. It notes the need for confirmation from RFS and other helicopter operators to determine effects on their operations from the development (EIS p182). We request that Department of Planning and Environment ensure that the relevant agencies are consulted, and that any concerns are addressed to the satisfaction of those agencies.

Monitoring and Enforcement:

Management of air quality and noise and vibration impacts on the community depends on effective implementation and monitoring of control measures, and enforcement of consent conditions.

We agree that noise and vibration monitoring should be undertaken if complaints are received (Acoustic Assessment p45) and suggest this be extended to include monitoring of air quality impacts. If complaints and/or monitoring indicate additional control measures are needed, these must be implemented.

We request that consent conditions be applied to address these comments.

Community Feedback and Engagement

As recommended by the Acoustic Assessment, community liaison contact points should be available to facilitate communication, and for the community to lodge concerns or complaints. A prompt and genuine response must be made to any complaints.

We encourage the applicant to consult with the surrounding community, to ensure that the project does not impact on the community, for example to identify a works schedule that will create least possible disruption.

Noting possible exceedances of noise management levels arising from playground use (Acoustic Assessment p52), the school operator is encouraged to establish processes whereby any operational noise impacts can be addressed with the community.

We request that consent conditions be applied to address these comments.

If further information is required, please contact Kerry Spratt, Senior Environmental Health Officer, on telephone 4320 9730 or email kerry.spratt@health.nsw.gov.au.

Yours faithfully,



Dr Kathryn Taylor
Director, Public Health Unit
Central Coast Local Health District