

I am a resident of the Central Coast Local Government Area and raise a strong objection to the proposed Kariong Sand and Soil Supplies Facility on environmental amenity and public interest grounds.

In this regard, please find the following contents of my submission which are required to be adequately addressed and resolved prior to the determination of application number SSD 8660 for any type of approval.

As part of the Secretary's Environmental Assessment Requirements (SEARs) the applicant is required to address Air Quality and Odour as a 'Key Issue' as part of the creation of an Environmental Impact Statement (EIS). The SEARs state the following with regards to air quality and odour:

“Air Quality and Odour – including:

- a quantitative assessment of the potential air quality, dust and odour impacts of the development in accordance with relevant Environment Protection Authority guidelines;
- the details of buildings and air handling systems **and strong justification for any material handling, processing or stockpiling external to a building;** and
- details of proposed mitigation, management and monitoring measures; and”

As per the above, the applicant is required to provide a strong justification for any material handling, processing or stockpiling external to a building. The EIS prepared by Jackson Environmental and Planning, and the Air Quality Impact Assessment prepared by Northstar Air Quality have provided no strong justifications for the material handling, processing or stockpiling external to the building and therefore the development cannot be supported.

Study Area:

The site is located on a natural high point west of the Gosford Valley. Due to the topography of the greater locality there is considered to be high potential for airborne pollutants generated by the proposed use to be carried and dispersed on residential uses across Gosford LGA, especially to the east. The Air Quality Impact Assessment and EIS have taken into consideration seven surrounding sensitive receivers in Kariong and Somersby to the south and north of the subject site, but has only used data from one sensitive receiver in Point Clare to the east. Accordingly, there is considered to be insufficient impact assessment undertaken to the east of the site where a large portion of residential living occurs in the context of the proposal. This would render the Air Quality Impact Assessment inadequate for use as part of the EIS.

Topography:

Section 4.3 – Topography, of the Air Quality Impact Assessment states the following:

“The wider area does contain more significant features as shown in Figure 5, although these would not impact significantly upon the transport and dispersion of pollutants between the project site and receptors.”

The applicant has provided no evidence to support the above statement that the local topography would not impact significantly upon the transport and dispersion of pollutants from the proposal to receptors. Including large scale assumptions like this as part of the study would again render the Air Quality Impact Assessment inadequate for use as part of the EIS.

Material Processing:

Throughout the impact assessment and EIS the applicant states that best practice methodologies will be applied to the proposal during its operation, however it goes on to note that, *“Full enclosure of materials processing activities in the ‘processing area’ is not proposed. As the area covered by the materials processing area makes the use of full enclosure impractical. The area of land which would be required to be covered to enclose all materials processing activities and ensure that FEL could access machinery to deposit loads would be greater than 3,000 m². The capital expenditure for such an enclosure would increase the overall cost of the project substantially.”* (page. 43, Air Quality Assessment, Northstar Air Quality, 2018). It is evident from this statement that the best practice air quality control measures are not being proposed at the site on the basis of financial reasons and at the expense of optimising environmental amenity for the locality.

The impact assessment further notes in Table 9 that full enclosure of the processing areas could control air quality with 100% efficiency (see copy of Table 9 below). This demonstrates that the applicant is not proposing the best practice approach and is willing to compromise the environmental quality and amenity of the locality in order to reduce costs associated with the development.

Table 9 Emission reduction methods and particulate control efficiencies – material processing

Emission control method	Adoption	Control efficiency (%)	Reference / Notes
Application of water	✓	91.6 (screen) 77.7 (crush) 50 (shred)	Control efficiency adopted from (USEPA, 2006) Control efficiency adopted from (USEPA, 2006) Table 4 of (NPI, 2012)
Modification of activities in windy conditions	✓	-	As required. Not quantified
Enclosure	✓	70	Table 4 of (NPI, 2012) (Katestone Environmental Pty Ltd, 2011) Only for activities within ‘secondary sorting warehouse’
Enclosure with control device	✗	90-100	Table 4 of (NPI, 2012) (Katestone Environmental Pty Ltd, 2011) Would increase the cost of the project substantially

Considering the relevant constraints, the project would employ best practice emission controls for materials processing

It is therefore evident from the above that the development is not in the public interest as the proposal is not adopting the most effective environmental management practices for material processing onsite.

Conclusion:

It has been demonstrated from the above that the EIS and Air Quality Impact Assessment are deficient and inadequate with regards to the amount and location of receptors used in the study and assumptions made about the topographical conditions of the locality and their effect on the dispersion and transport of pollutants to sensitive receivers. In addition to this, it is evident that the applicant is not adopting best practice measures by fully enclosing material processing areas on the basis of reducing development costs only.

Accordingly, the EIS has not provided a strong justification for any material handling, processing or stockpiling external to a building and fails to ensure that acceptable environmental amenity will be upheld as a result of the proposal.

Resultantly the proposed development is not in the public interest and cannot be supported without material processing and stockpiling areas being fully enclosed as part of the operation of the site.