



Coastal **Design Link**

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Kariong Sand & Soil Supplies 90 Gindurra Road, Somersby

Objection Submission (SSD 17_8660)

Prepared For:	NSW Department of Planning
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1.0 Introduction

Coastal Design Link has historically been involved in the corporate relocation of organisations over the past two decades. We have also argued vigorously for the Somersby Industrial Precinct to become a proper 'Business Park' and attract real businesses who will bring significant employment whilst conforming to the style of development that the Central Coast seeks. This focus is not dissimilar from that which has occurred in places such as NorWest Business Park in Sydney.

The potential to attract significant employers and corporate entities to a business park environment is in no way enhanced by the inclusion of developments such as that included in the application currently before the NSW Government for 90 Gindurra Road.

As a consequence, with this firm's history and the frustration of attempting to establish a significant employment precinct operating, we find the proposed usage of the site at 90 Gindurra Road to be highly incompatible with a proper strategic corporate development focus of the region. The proposed development, whilst potentially valuable and representing a significant employment opportunity, does not take into consideration the appropriateness of such a development on the particular subject site. An alternative location would be more suitable.

This document outlines details of the proposed development and highlights the issues and concerns that accompany the proposed development and provides points of discussion and consideration as part of the application approval process.

2.0 Site Details

The subject site is situated at No. 90 Gindurra Road, Somersby. It consists of an elongated rectangular shaped allotment measuring approximately 10.8ha in total area. Parts of the northern portion of property are currently cleared and in use by an existing sand and metal recycling facility, however the majority of the subject site remains afforested and devoid of and development.

Included below is an aerial photograph outlining the subject site and its immediate surrounds.



Figure 1: Aerial view of subject site

The site is zoned IN1 – General Industrial as per the provisions of the Gosford Local Environment Plan (2014) however the property has seen limited use in this capacity for a significant period of time. To the west are additional industrial zonings, whilst to the immediate north and east of the site are rural and environmental zonings, whilst to the south is a large area of ‘Special Infrastructure’ zoning encompassing a disabled riding school and the Kariong Juvenile Justice & Correctional Facility.

As can be seen above, the site sits on the eastern side of the M1 – Pacific Motorway and is positioned on the eastern extremity of the Somersby Business Park to the west. This position has it somewhat removed from the bulk of industrial & commercial activity taking place further to the west and instead the site is situated in direct proximity to nearby rural residential development as well as large tracts of undeveloped environmental land, some of which is identified as ‘Open Space’ assets for Central Coast Council.

3.0 Proposed Development

The application outlines the intent to establish a ‘Sand, Soil & Building Materials Recycling Facility’ on the subject site. This facility is proposed to receive waste materials from the building and construction industry as well as additional sources for sand, soil and landscaping materials. It is noted that the proposed development intends to process up to 200,000 tonnes of waste materials per year and is thus identified as a “State Significant” development under the provisions of the NSW Environmental Planning & Assessment Act.

As per the NSW Department of Planning website, the current application for 90 Gindurra Road includes specific provision for the following:

“The project involves expansion and upgrade of an existing resource recovery facility to enable the receipt, processing and storage of up to 200,000 tonnes per year of non-putrescible construction and demolition waste, including:

- *vegetation removal in the northern part of the site*
- *installation of site security fence*
- *installation of stormwater management infrastructure*
- *construction of storage bunkers for receiving incoming materials and storing processed products*
- *construction of hardstand across operational areas*
- *construction of on-site roads suitable for large vehicles*
- *construction of car parking provisions*
- *installation of a weighbridge*
- *construction of acoustic barriers.”*

The environmental impact statement for the application has been prepared by Jackson Environment & Planning on behalf of Kariong Sand & Soil.

A visual summary of the information on the NSW Department of Planning website can be found on the following page in Figure 2.

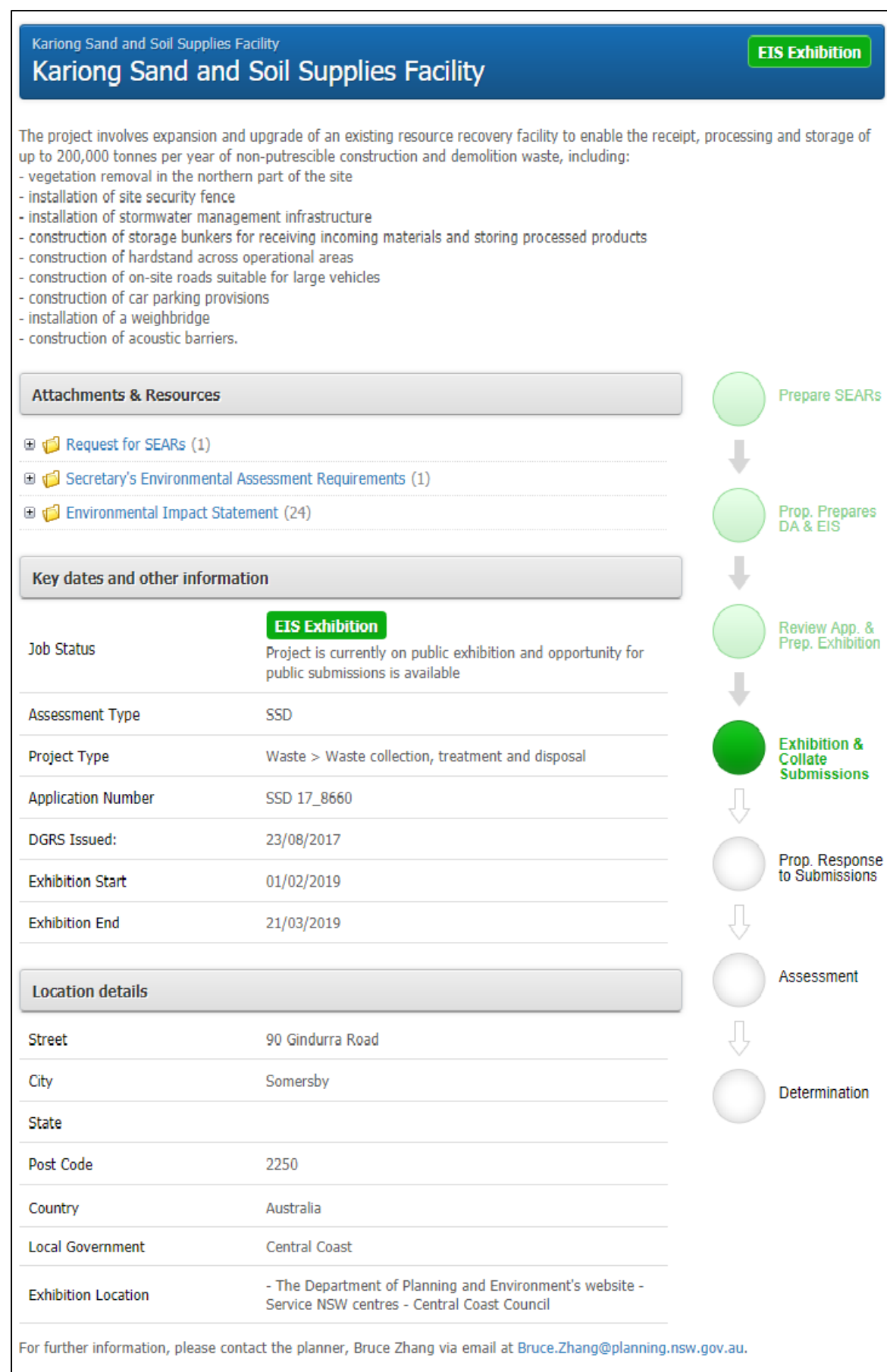


Figure 2: Application Information Summary

4.0 Issues & Concerns

A number of issues and concerns exist with regard to the proposed development at 90 Gindurra Road. These issues range from statutory inconsistencies and manipulation of the application process, to incompatible land use considerations and adverse effects on roadways and residents. Following is a brief discussion of these issues as they relate to the proposal.

4.1 Inconsistency with Central Coast Regional Plan (2036)

The proposed development, being contained within the Central Coast, is required to conform to the strategic goals and objectives set out by the NSW State Government in the Central Coast Regional Plan (2036). The regional plan outlines four over-arching goals for the strategic development of the Central Coast. These goals are:

- Create a prosperous Central Coast with more jobs closer to home.
- Protect the natural environment and manage the use of agricultural and resource lands.
- Create well-connected communities and attractive lifestyles.
- Develop a variety of housing choice to suit needs and lifestyles.

The proposed development has a number of conflicts with the above goals as outlined by the regional plan. These conflicts include, but are not limited to, issues such as:

- Appropriateness of employment generating activities in the broader locality.
- Impacts of the proposal on environmental assets and surrounding agricultural land-holdings.
- The detrimental impacts of a heavy industrial activity on the broader community and the available lifestyle for this surrounding community.
- The potentially limiting impact of an inappropriate industrial use on directly adjoining residential locations. Such activities will have a reductive effect on what residential and housing lifestyles can be effectively established in the area.

The above issues all exhibit inconsistency with the stated goals of the regional plan and raise questions about the suitability of the proposal for approval.

4.2 Development Application Procedural Concerns

There is a significant concern to be considered with regard to the process by which the application has opted to follow. The current application is considered State Significant by virtue of the volume of waste material intended to be processed.

Coastal Design Link was engaged by the previous late owner, Mr Ray Davis, to review the matter of a waste management facility on the property. As part of said review, it was apparent that previous discussions with Central Coast Council undertaken by Mr Ray Davis, indicated a clear intent to engage with Council as the relevant consent authority on the matter.

Yet the current application has instead apparently chosen to circumvent the local authorities by the simple expedient method of raising the required volume of processing so as to seemingly deliberately exclude Council from the process. This represents a potentially concerning direction for the application and should be carefully considered in the context of whether or not approval is appropriate at a state level.

4.3 Land Use Incompatibilities

In recent times Darkinjung Aboriginal Land Council has been given access to the NSW State Government for the development of rural subdivision on their holdings situated on Debenham Road. There are already rural residential receptors within the same precinct and with the potential for enhancement of residential properties, the proposed development represents a potentially incompatible usage in direct proximity to significant future residential development.

The heavy industrial land use involved in the proposed development, in an area identified as a 'business park' wherein the intent would be to attract corporate entities with corporately focused activities is an aberration and detractor from any engagement with similar types of development that have been exhibited in relevant circumstances elsewhere (such as NorWest Business Park in Sydney).

4.4 Impact on Relevant Receptors

The proposed development is located in very close proximity to a number of sensitive residential receptors. These receptors are, in some cases, situated *directly* adjacent to the subject site and such a position represents the potential for some very detrimental impacts given the nature of proposed activities.

Receptors need to be assured that there will be no potential risks with regard to human health or safety. The activities to be undertaken as part of the proposed development include the crushing of concrete and stone materials. This activity results in the emission of airborne particulate matter which is not only has potentially harmful effects, but is also difficult to control, especially with the volumes specified by the proposed development.

In addition to the above, there are significant safety concerns to be raised for the employees who are working on the site. If the proposed development, as stated, intends to attempt containment of all emissions to within the boundaries of the subject site, then this will have the effect of significantly intensifying the volume of particulate matter and emissions within the working environment of the development. The safety of employees is another consideration that should be ensured as part of the application approval process.

Furthermore, the heavy industrial nature of the proposed development will inarguably produce significant noise impacts. Irrespective of the acoustic barriers that are proposed to be put in place, this noise will have a direct, constant and unending impact on the amenity of surrounding residential receptors. The impact will only increase over

time as the surrounding lands are likely to see an enhanced volume of residential development in the future.

4.5 Traffic Considerations

The proposed development outlines a significant volume of heavy vehicle traffic that will be necessary as part of daily operations (approx. 124 vehicle movements per day). These vehicular movements will be taking place on a relatively short stretch of Gindurra Road. There are several concerns with this volume of heavy vehicle traffic in the vicinity of the subject site.

1. Poor sightlines due to the length of the road and the corner with Debenham Rd (south).

The proposed development intends to utilise a substantial number of heavy vehicles which will ingress and egress the subject site from a point very close to the intersection between Gindurra Road and Debenham Road.

This represents a potential traffic hazard for other traffic within the area (primarily local traffic in light vehicles) as the presence of large vehicles (up to B-Double in size) will be less than adequately visible for traffic turning onto Gindurra Road at the intersection with Debenham Road. The short distance and proximity to the ingress/egress point to this intersection does not allow for adequate sight lines for other traffic to safely traverse this stretch of road.

2. The impediment of Debenham Road as an alternative access to parts of the Central Coast.

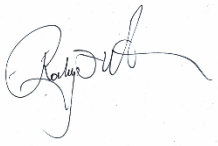
The second issue pertains to the function that Debenham Road South serves as an alternative access into Gosford in the event of blockage on the Central Coast Highway.

There are limited points of access down the hill into parts of the central coast in and around Gosford. Debenham road serves as an alternative access to these parts and the proposed volume of traffic identified as part of the proposed development raises concerns as to whether or not Debenham Road can continue to function adequately in this capacity with so many large vehicles constantly being in a position to obstruct the flow of other traffic. This is a significant issue and requires careful consideration.

5.0 Conclusion

This document has sought to outline a number of issues that pertain to the proposed development at 90 Gindurra Road. It is considered that the proposal represents a development which is not only inappropriate in scope and nature, but also has significant potential negative impacts on a collection of receptors, on the potential development capacity for the area in future and on the existing traffic and roadway infrastructure.

These concerns are worthy of consideration and we hope that the information included in this document instil an appropriate level of concern with regard to the suitability of the proposed development for the particular area in which it is to be located. We once again stress that an alternative location that does not infringe on nearby residential and potential future development would be far more appropriate for such a development.

A handwritten signature in black ink, appearing to read 'Rod Wall', is positioned above the printed name.

Rod Wall

Coastal Design Link
