

Submission on the Kariong Soil and Sand Supplies Project (KSSS)

I have several major concerns with this project. I would be very grateful if these can be considered and addressed. My view is that the project should be rejected on the basis of the following issues. In the possibility (however unfortunate) that approval might be given, I've made some suggestions which I hope will be considered. None of these suggestions detract from my view that the project should be refused.

I object in the strongest possible terms to the KSSS project on the basis of its likely impacts, which are:

1. **Cumulative impact:** Impacts need to be considered cumulatively, not site by site. The Somersby Industrial Estate has seen widespread land clearing with substantial native vegetation loss over the last 20 years, accelerated during the last few years. There are SEARs issued for a similar project immediately across Gindurra Rd from KSSS, meaning that someone has a definite intent to apply for that project. The KSSS project MUST be viewed in the context of the surrounding development (current and future likely) and its cumulative impacts (habitat loss, noise, air quality, traffic, water usage ect) assessed accordingly.
2. **Land clearing:** Loss of habitat for fauna and flora, many of which are threatened under NSW and Commonwealth legislation. The Flora and Fauna Study (FFS) says 2.5 ha of native vegetation will be cleared and that 'species that require ecosystem credits have a high likelihood of being present on the development site'. Clearing this land, especially 1.4ha of Eastern Pygmy Possum habitat is not acceptable. In the unfortunate event that the project goes ahead, it needs to be redesigned to avoid clearing native vegetation so that habitat value is retained.

The stand of *M. biconvexa* and identified Eastern Pygmy Possum and Barking Owl populations are of particular importance. The buffer zone around the *M. Biconvexa* stand is insufficient and won't provide adequate protection for this endangered species. Eastern Pygmy Possum and Barking Owl habitat must be retained at all costs and its destruction is unacceptable. The FSS recommendation that ecologists are on site while land clearing happens, and waiting until nests are vacated are noted, and should be considered essential actions in the unfortunate event that the project goes ahead. If needed, this work must be to best practice and animals located during the land clearing process must be safely relocated. This is not to mean that the project should be approved!

Offsetting should be a last resort. It's not satisfactory to offset impacts on flora and fauna because like for like cannot be guaranteed. Offsetting land in Pittwater will not benefit local populations, either human, flora or fauna. In any case the FFS notes that species offset credits (Eastern Pygmy Possum) are unavailable. This indicates refusal of the project is warranted.

The suggestion to enter into a Biodiversity Stewardship program is commended but is the least that should happen. Some kind of formal and binding management plan for the native vegetation is required, including remediation of disturbed areas. This applies to the site whether or not this project goes ahead.

We need to apply the precautionary principle to flora and fauna impact assessment and management, please, to ensure that land clearing, especially native vegetation is minimised. In this case, refusal is warranted but redesign of the project is required in the very unfortunate case that it goes ahead.

3. **Landscape warming:** Hard surfaces are warmer than vegetation. Reduction of heat sinks and increased urban cooling are imperative. Building this resilience is discussed in the Sustainability and Resilience chapter of the Somersby to Erina Corridor plan (Central Coast Council) on exhibition currently. Vegetation clearing contributes to global warming, there is plenty of science to back that up. The KSSS project plans to clear more vegetation and replace it with extensive hard surfaces is unacceptable, and inconsistent with Sustainability and Resilience.
4. **Pollution:** the project presents a risk of chemical spills, disturbance of asbestos, sediment runoff ect. The increased risk to human and animal health and the environment is unacceptable.
5. **Air quality impacts:** The project will create increased dust emissions into the surrounding environment, with potential to affect the wider community. This will put the community's health at risk and is unacceptable.
6. **Noise impacts:** increased noise will create disturbance to surrounding properties, including a potential safety risk from loud noises to Riding for Disabled participants (startled horses and children). Riding for Disabled have used their site for many years and the risk of disturbance is unacceptable.
7. **Safety risks from heavy vehicles:** increased traffic movements of 162 vehicles per day, mostly heavy vehicles, will create a safety risk for other road users. The property entrance is just around a corner on the through road to West Gosford (Debenham Rd South). Locals use this road to avoid traffic on the main roads. The traffic assessment says the sight lines are adequate because of the speed limit, I say the sightlines are entirely inadequate because of the corner. The huge increase in vehicle movements presents an unacceptable risk to the community's safety.
8. **Intensification of existing use:** the proposed activity is exponentially larger than the existing operation. It seeks a 20 fold increase in production with resultant increase in the impacts discussed. There are very few similar scale operations in the Somersby area currently and none on the interface with residences, preschool, high school, juvenile justice centre and Riding for the Disabled. This location is particularly unsuitable for such intensification and does not fit in the amenity of the wider Somersby and Kariong areas.
9. **Water:** We are in a drought. Water is precious. The project intends to rely on water for dust suppression to avoid air quality impacts. It is entirely unacceptable that our precious and very limited water supply should be used in this manner.

For these reasons, the project is not in the public interest and should be refused. Please do not allow it to proceed. Thanks for considering my submission.

Yours truly



Sally Anderson