



Bruce Zhang
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Industry Assessments
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By email Bruce.Zhang@planning.nsw.gov.au and online

Dear Mr Zhang

Re: Kariong Sand and Soil Supplies Facility (SSD 17_8660)

Thank you for the opportunity to review the environmental impact assessment for the Kariong Sand and Soil Supplies Facility project. Central Coast Public Health Unit (CCPHU) would like to provide the following comments.

1 Air Quality

Epidemiological studies have been unable to identify a threshold below which exposure to particulate matter air pollution (PM) is not associated with health effects. Therefore, any increase in exposure must be assumed to have an adverse impact, even at levels below the assessment criteria. If the project is approved, the proponent should be required to employ best practice measures to minimise PM emissions (both PM_{2.5} and the coarse particle fraction of PM₁₀) from all sources to ensure that any risk from PM is as low as reasonably practicable.

We defer to the EPA's assessment of the appropriateness of the model, validity of the assumptions underlying the air quality modeling and estimated impacts on particulate pollution. It is noted that Figures 8 and 9 and Table 6 clearly demonstrate increased particulate levels exceeding the PM10 24 hour criteria, beyond the property boundaries. This may have implications for the future use of these lands by the owners of adjacent properties.

Table 21 shows the incremental impact of operations on PM10, for Receptor R3. The second part of the table (the right hand side) shows increased particulate levels, with fewer days below 10mcg/m³ and 20mcg/m³. While no additional exceedances are identified, there will be more days with higher levels of particulates.

2 Noise impacts

We defer to the advice of the Environment Protection Authority (EPA) as the regulatory authority for noise, and request confirmation that the noise assessment, project noise trigger levels, mitigation measures and management plans are appropriate.

Since the predicted construction noise levels have potential to impact a number of residences, the proponent should negotiate with the affected community members and commit to a construction schedule that creates the least possible disruption.

The *Noise and Vibration Impact Assessment* (p24) states that ‘there would generally be no construction on Sundays and Public Holidays’ and that construction works would not occur at night (p25). We suggest that should the project be approved, construction activities should be formally restricted to daytime, Monday to Saturday.

The premises operated by Riding for the Disabled is located some 100 metres to the south of the project site. This site has been classified as a commercial activity in Table 10 of the *Noise and Vibration Impact Assessment* and a Project Noise Trigger Level (PNTL) assigned accordingly. We suggest that this activity is more appropriately considered as active recreation and that the PNTL should be set on that basis. Likewise, the Frank Baxter Juvenile Justice Centre is considered temporary accommodation in Table 10. We suggest this facility should be considered as (suburban) residential and the PNTLs reviewed. The noise assessment should be reviewed with these changes, to ensure there are no noise impacts as a result of both the construction and operation phases of the project.

In assessing traffic noise impacts, the *Noise and Vibration Impact Assessment* relies on a vehicle count of 4000 to 4700 vehicles per day on Gindurra Road. In assessing the impact of the project’s additional traffic movements, it is important that the local roads are accurately characterised. We ask for confirmation that the vehicle count used is accurate and if not, the potential for traffic noise impacts should be reviewed.

The conclusion that the predicted noise emissions from the site to the surrounding environment are low is predicated on various control measures. We seek clarification that the 35dB Rw façade noise reduction claimed for the processing shed is realistic, and that the complete closure of all doors and openings during ‘noisy activities’ is practical and achievable. If either control measure cannot be implemented effectively, the noise impact assessment should be reviewed to ensure noise emissions meet the relevant criteria. The concept of ‘noisy activities’ should be clearly defined to ensure noise impacts are avoided.

All proposed noise mitigation measures (assuming they receive EPA endorsement) should be incorporated into any consent, and implemented effectively.

3 Water and Sewerage Services

To avoid potential impacts on health and the environment, the site should be connected to Council’s sewerage system in preference to an onsite sewage management system (septic system). We also suggest that the use of potable water for non potable uses such as dust suppression should be avoided as much as possible, in order to conserve this resource.

4 Monitoring and Enforcement

Should the project proceed, comprehensive monitoring of noise emissions and air quality is required to ensure that the project goals are met and that the health and amenity of the community are not negatively affected. We support the need for continuous real time monitoring of air quality and noise impacts, and the implementation of management strategies that are consistent with best practice, clearly quantifiable, measurable, auditable and enforceable. Methods for determining compliance must be to the satisfaction of the appropriate regulator.

Noting the undertaking to provide PM 10 monitoring stations at the property boundary, the applicant should identify and utilise sampling sites which can be left in situ for extended periods to enable comprehensive assessment of both noise and air quality impacts.

5 Resident Feedback

The community must have a contact point for complaints if noise or air quality issues occur, and the proponent must guarantee a prompt and genuine response to all complaints. A 'complaints management protocol' should be developed and implemented in consultation with the community so that the community can be confident that any concerns will be effectively addressed.

In conclusion, we note that the current assessment indicates exceedances of air quality and construction noise goals beyond the property boundary. As noted, research indicates that air quality and noise impacts may produce negative health effects even at exposures below guidelines. Additionally, significant health outcomes can arise if guidelines are not met. Accordingly, should the project proceed, we encourage appropriate controls, including enforcement, to ensure that adverse impacts are avoided.

Thank you for the opportunity to comment on this proposal. If you need clarification on any of the points raised, please contact the Public Health Unit, Dr Peter Lewis, or Kerry Spratt on 43209730

Yours Sincerely



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