

23rd June 2011

Department of Planning & Infrastructure NSW
Major Projects Assessment
Room 304, 23-33 Bridge Street
SYDNEY NSW 2000

Dear Sir/Madam

Attention: Haley Rich
Environmental Planning Officer

Subject: Orica Kooragang Island Modification Application

Thank you for the opportunity to comment on the proposed modification to the above facility. The documents relating to the proposed modification have been reviewed by the Health Protection team, within Hunter New England (HNE) Health's Population Health, Planning and Performance Division.

In relation to health protection concerns consideration should be given to protecting the health of the community from potential environmental health hazards, which may be created through future development. As illustrated in the *'Healthy Urban Development Checklist'*, health is influenced by the quality of our environments (natural, built, social and cultural) and how they are managed and maintained is paramount in protecting human health and the health of the environment. To alleviate the key environmental and public health concerns the following recommendations need to be considered. These include:

- Ensuring there is minimal impact from the proposed development on the water quality of surrounding natural waterways, particularly from stormwater runoff.
- The incorporation of best practice design principles in water saving strategies such as rainwater tanks and grey water re-use.
- A mosquito risk assessment of the site to ensure any potential mosquito breeding sites. Furthermore, a mosquito management plan should also be developed which will reduce both nuisance biting and disease transmission mosquitoes and their subsequent effects on the occupants of the site and the local community.

- The long history of industrial use of the site and surrounds may have lead to contamination of soil. Soil contamination should be addressed before development occurs. A remediation plan for the site should require that all land will have all contaminated soil removed and the final remediation be validated as safe by a Site Auditor. We believe this should occur across the site to provide adequate assurance of health protection.
- Any water cooling system and/or warm water systems must meet the NSW Code of Practice for Plumbing and Drainage, relevant Australian Standards and the NSW Code of Practice for the Control of Legionnaires Disease 2004. They must be installed and maintained to prevent the growth of *Legionella*.
- The storage and movement of Hazardous Materials on the site should be included in the sites Emergency Management Plan. The plan should reflect the increase in quantity of Hazardous Materials attributed to the modification any the effect of that increase to employees, adjoining properties and the community.
- The Emergency Management Plan for the site should incorporate procedures that outline a strategic Early Warning System (EWS) for any incident/emergency emanating from the development that may affect adjoining properties and the local population.

If I can be of any further assistance please contact Chris Williams on 0249246481 or 0409153175.

Yours Faithfully

Professor David Durrheim
Service Director
Health Protection
Hunter New England Population Health
NSW Health – Health Reform transitional Organisation Northern