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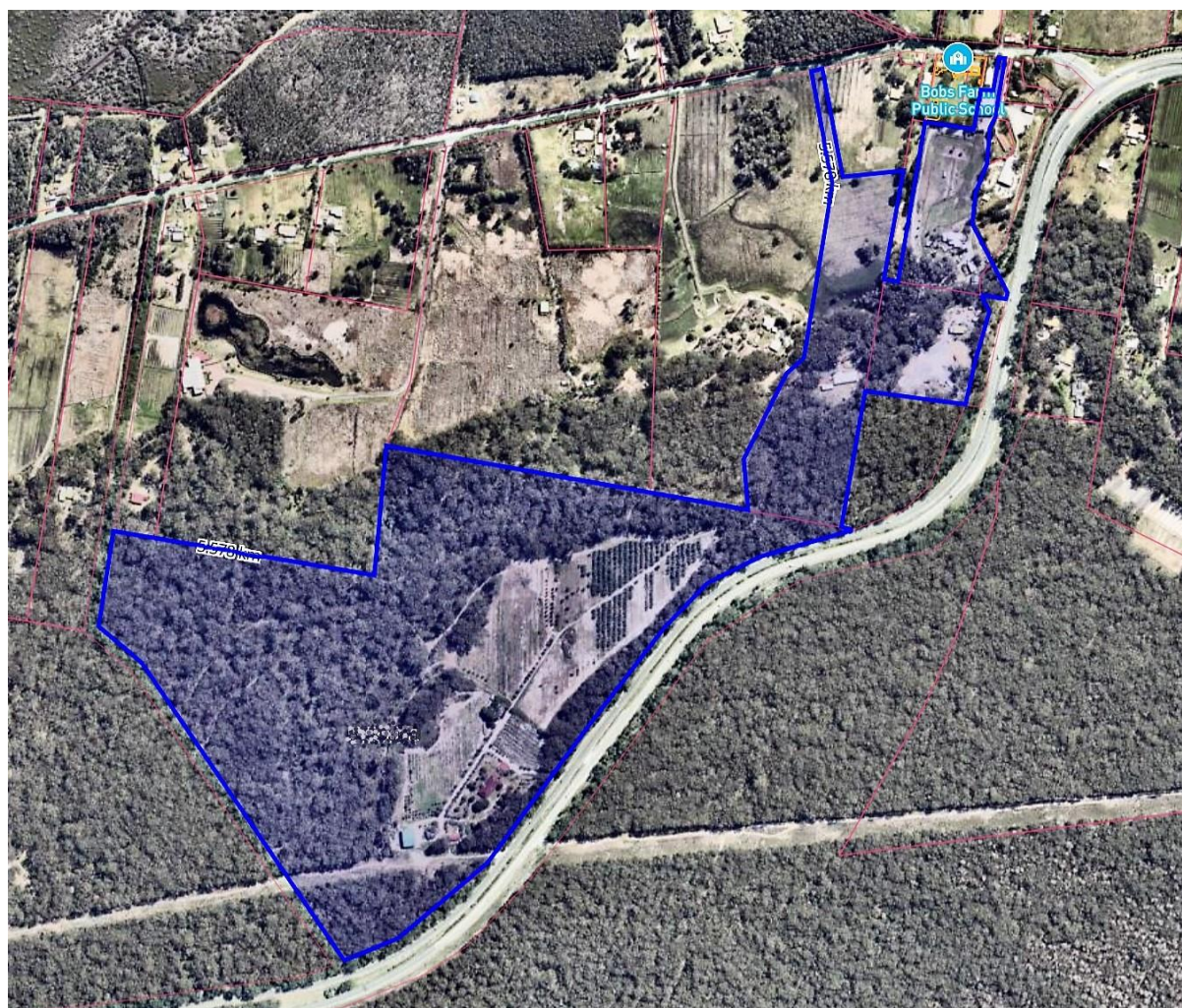
The Secretary
Department of Planning and Environment
PO Box 39
Sydney NSW 2001

Dear Madam

Bobs Farm Sand Mine (SSD 6395)

Thank you for the opportunity to provide comment in relation to the proposed sand mine operation adjoining Bobs Farm Public School.

The location of the school, adjoining the proposed sand mine development site is shown below.



The school and its wider community have serious concerns about the significant environmental and social impacts that the development will have. Many of these concerns were raised in the public meetings conducted by the proponent but have not been adequately addressed in the environmental impact statement submitted with the development application.

The school has been operating in Marsh Road for many years, enjoying the advantages of a quiet semi-rural environment with no impacts or encroachments from commercial or industrial uses like the sand mine now proposed. If the development is approved, this environment will change significantly to one that is characterised by higher day time noise levels due the operation of plant, machinery and heavy vehicles; a deterioration of air quality due to airborne sand and dust particles and possible resultant impacts on public health; a reduction in road safety for students, teachers and parents in their daily use of Marsh Road and Nelson Bay Road; and potential reduction of quantity and quality for the water supply due to extraction activities below the water table and air borne pollutants.

Noise Impacts

Existing day time background noise levels around the school are relatively low. At peak times, vehicle traffic on Nelson Bay Road is the main elevated noise source, but this does not coincide with school hours. Under the proposed development there will be numerous noise sources, including heavy plant and machinery used for the excavation, screening, washing, stockpiling and transport of material. This noise will occur during school hours.

Despite the findings in the Noise Assessment Report within the EIS, any increase in noise has the potential to disrupt the school teaching and learning activities and to impact on the enjoyment of the school play space. It is also not acceptable for heavy laden trucks to use a driveway on to Marsh Road in close proximity to the school. The bitumen road carriageway in front of the school is approximately 6 metres wide, which is not suitable for use by large volumes of heavy vehicles. Vehicle egress should be created to Nelson Bay Road and the developer be responsible for the cost of compliance with RMS requirements. This cost factor should not be used as a reason to transfer the noise impacts to the school community and the residents of Marsh Road.

The EIS noise impact assessment proposes, as a measure against likely exceedances of regulated noise levels, to erect a 4 metre high noise barrier around the site and near the school. This structure is lacking in detail and needs to be assessed for its own potential impacts, such as visual amenity, and to confirm its noise mitigation properties and the maintenance responsibilities over the life of the development.

In relation to noise assessment methodology we also request that confirmation be provided by the proponent that the correct methodology has been followed for the noise assessment given that the EPA's Noise Policy for Industry (2017) has replaced the Industrial Noise Policy used in the proponent's EIS. If the incorrect policy has been used an updated noise assessment needs to be provided.

Air Quality

As demonstrated by the questions raised at the community meetings, the potential public health risks posed by the development remain the major concern surrounding the air quality impacts of the development. It is not sufficient for the EIS to only state that the level of air borne dust particles will meet industry standards. It is significantly more important that the proponent demonstrate without doubt that there will be no short or long term health impacts due to the nature of the air borne pollutants created by the development. In particular there is little or no reference in the EIS to the concerns raised in the public consultation meetings about silicosis and the potential long term health effects. The principle of prudent avoidance should be applied and no development be approved where there is any doubt on this issue.

Any air borne dust also has the potential to impact on the school's tank water supply, which, when added to the potential groundwater impacts on the school's bore, may jeopardise the entire water supply for the school. Dust sources within the operational areas of the site will be numerous, including removed and stockpiled top soil, excavation activities, screening, sand stockpiles, exposed batters and working faces, loading of trucks and internal tracks and work areas. It is not practical for suggested water spraying to cover these areas and therefore the likelihood of dust particles being carried off the site is very high.

Traffic

In addition to vehicle noise and vibration, the significant increase in vehicle movement around the site has the potential to reduce road safety levels for drivers, passengers and pedestrians attending the school. The EIS says that heavy vehicle routes will not extend past the school frontage. This will be difficult to enforce and will depend on good driver behaviour which, over time, is unlikely to be maintained. In any case, heavy vehicles will still be exiting to Marsh Road in close proximity to the school bus and parent drop-off and pick up zone. In this section of Marsh Road safe sight distances are reduced due the bends in the road alignment in both directions. To introduce significant numbers of large and slow moving trucks in this traffic environment is not consistent with safe school zone principles.

The department requests these matters be considered in the assessment of the application. Please contact Statutory Planner, David Lewis on david.lewis83@det.nsw.edu.au for any further information.

Yours sincerely



David Lewis
Statutory Planner
17 January 2019

