

Director – Industry Assessments, Planning and Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

**RE: AMENDED STATE SIGNIFICANT DEVELOPMENT APPLICATION
SSD-8660: KARIONG SAND AND SPOIL SUPPLIES FACILITY AT
NO. 90 GINDURRA ROAD, SOMERSBY.**

I refer to the public notification of Amended State Significant Development Application SSD-8660 proposing the expansion and upgrade of an existing resource recovery facility at No. 90 Gindurra Road, Somersby, operated by Davis Earthmoving & Quarrying Pty Ltd.

The proposed amended development involves a significant expansion in volumes and categories of materials to be processed at the site and a significant increase in vehicle movements, delivering unprocessed materials and removing processed materials from the site. The proposal has a number of potential impacts on my various vehicle sales and services business premises located in Kangoo Road, Somersby, comprising:

- Worthington BMW – Nos. 1 – 3 Kangoo Road, Somersby;
- Worthington Motorcycles – No. 5 Kangoo Road, Somersby; and
- Central Coast Lexus – N. 13 Kangoo Road, Somersby.

My company has developed a number of high quality architecturally designed commercial business premises located in Kangoo Road, Somersby, from which I sell and service high value prestige motor vehicles and motorcycles. At any one time the value of buildings and stock approximates \$35m.

My principal concerns regarding the operational phase of SSD-8660 relate to dust generation and its potential to damage the paint surface of high value prestige vehicles and impose additional costs to my business associated with the increased frequency and care in cleaning both vehicles and business premises; and the potential for increased heavy vehicle movements between the proposed facility and Central Coast Highway via Kangoo Road, increasing road safety risks for both my staff and customers.

1. Dust Impacts.

It is noted that *air quality assessment* of the proposed amended development is provided in Chapter 9 of the accompanying Environmental Impact Statement (EIS), with dispersion modelling indicating that *'the proposed project will meet all NSW EPA air quality standards and goals, even under worst case scenario conditions'*.

Notwithstanding the above statement, the analysis of 'Receptor 8' presented in EIS Tables 9.12 and 9.13 and the Incremental 24-hour PM10 concentrations presented in EIS Figure 9.4, shows that there will be increased dust deposition at my premises. The EIS presents no analysis of the potential adverse economic impact of increased dust deposition on the operation on my prestige vehicle sales business.

Proposed air quality mitigation measures for the operational phase of the project are summarised in EIS Table 9.4 and include enclosures on crushing and grinding/shredding operations with accompanying water sprays for dust suppression; Construction and use of a three-sided shed in which all materials would be tipped and sorted, incorporating the use of misting sprays; and ceasing crushing, screening and grinding activities when wind speeds exceed 25kph.

These mitigation measures will not however avoid the proposed amended development increasing background dust levels and having an adverse financial impact on my businesses, as previously described.

It is not reasonable for development to be approved in the absence of full and proper consideration being given to its environmental and financial impact on existing businesses in the locality. This is a requirement of Section 4.15 (1) (b) of the Environmental Planning and Assessment Act 1979.

2. Traffic Impacts.

In the assessment of traffic and transport impacts provided in Chapter 10 of the EIS, the proposed development will generate an estimated 164 vehicle trips/day. The impacts of these vehicle movements on the local road system is intended to be managed by vehicles exiting Central Coast Highway onto Wisemans Ferry Road, thence onto Gindurra Road to access the site via a dedicated right turn lane.

The EIS recommends a concrete kerb on the exit to the site to ensure vehicles only exit to the left on Gindurra Road and do not proceed into rural and residential areas to the east (including Kangoo Road). A no right turn sign will also be installed at the exit to the site.

Notwithstanding the stated intention for tippers/trucks/semi-trailers and B-Doubles to access the site via Wisemans Ferry Road and Gindurra Road, for trucks travelling west along the Central Coast Highway from Gosford, the most direct route of access would be via Kangoo Road. Under certain circumstances, truck drivers may be tempted to use this route.

However, the relatively small pavement width of Kangoo Road, together with existing kerbside parking raises issues of public safety and traffic conflicts which need to be avoided. In the event of any development consent being issued for SSD-8660, it is imperative for a condition of consent to be imposed prohibiting truck movements from this development via Kangoo Road.

In conclusion, the Department is requested to give careful consideration to the particular matters raised in this submission when undertaking its final assessment and determination of SSD-8660. Should the Department have any questions in relation to the matters I have raised above, please contact me on Mobile: 0404887066 or by email at [brad.worthington@ worthingtonprestige.com.au](mailto:brad.worthington@worthingtonprestige.com.au).

Yours faithfully

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