



Mountain Districts Association

Working for our Rural Community and the Environment

www.mountaindistrictsassociation.com.au

24 September 2020

Submission opposing SSD-17-8660

This Submission is made by Mountain Districts Association (MDA) representing members from the communities of Somersby, Mangrove Mountain, Central Mangrove, Peats Ridge, Kulnura and Calga.

Summary

Mountain Districts Association continues to recommend the refusal of SSD – 17 – 8660. This is despite the changes made to the proposal which, although tweeking the application, do not address our core concerns that:

- The proposed use is an inappropriate use of a limited and valuable resource - land zoned for light industry and is contrary to the uses proposed in current Central Coast Council planning documents and the Central Coast Regional Plan 2036
- this is potentially a major environmental, public health and safety risk for nearby residents and for workers in the business area and
- the Response to Submissions fails to address the cumulative impact of the three further applications for waste processing identified in this area zoned for light industry (Somersby Industrial Park (SIP)).

1 Grounds for opposing

Currently Central Coast Council has a Draft Somersby to Erina Corridor Strategy on public exhibition. Somersby is one of six centres identified in this document. In it, Direction 6, Action 6.1 Employment Lands Strategy states; "In terms of supply of suitably zoned land, approximately 50% of the Somersby Employment Area (= SIP) or 159ha of land, is undeveloped. Whilst this appears on face value to meet demand, the Somersby Plan of Management (2005) suggests that parts of the undeveloped land may be affected by environmental constraints." These constraints are referred to in Direction 7, Action 7.1 Implement the Somersby Plan of Management, which states, "...the new Development Control Plan should clearly identify and provide clear guidance for development in areas of high value vegetation, and areas of aboriginal and archaeological significance." In the Central Coast Regional Plan 2036 released by NSW Planning & Environment in October 2016, (Goal 1 Direction 5: Support new and expanded industrial activity, Action 5.1) states, "Maintain an adequate supply of employment land that is appropriately serviced to respond to changing land use, location and the floor space demands of industry."

In mid 2018, Central Coast Council suspended plans to rezone a number of sites within SIP and to revisit the expansion of this or alternate industrial areas as part of the proposed Southern Growth Corridor Strategy in the Central Coast Regional Plan.

Mayor Jane Smith said “Council will be consulting with the community on how and where we develop industrial areas as part of the Southern Growth Corridor Strategy, and how this can position the Central Coast to take advantage of opportunities for economic growth and job creation for our community.”

In this context, it is with great concern that the community sees **three applications for waste processing within SIP**, which is the Somersby Employment Area referred to previously, with the Department of Planning, Major Projects, for State Significant Development consideration.

MDA continues to regard the proposed activities as an inappropriate use of this land. We reiterate our concerns that this development, and the use of a limited resource are:

- Inappropriate use of industrial zoned land intended to attract new business as identified by Central Coast Regional Plan 2036 and Central Coast Council Regional Plan.
- The development will still result in an unacceptable increase in the volume of heavy trucks visiting SIP daily and using Gindurra Road. The question of who is managing the cumulative impact of increased truck traffic in this area has not been adequately addressed.
- Waste processing operations will create significant noise which will impact on local residents in and on the fringe of this area. Nearby to Gindurra Road is land zoned RU1 for residential purposes so it is important that the uses of this site be compatible with this land zoning.
- Despite the proposed mitigation measures, concerns remain about the impact of dust in the air created by handling of green waste, soil waste, timber waste and particularly concrete crushing. Air pollution caused by toxic contaminants from concrete crushing operations and other waste processing activities that generate microbiological air contaminants should be prohibited from this area.
- Despite the proposed mitigation measures, concerns remain about the impact of the proposal on the environmentally sensitive catchment for several waterways.

2. Qualification as State Significant Development.

MDA restates its belief that the proposal SSD – 17 – 8660 should be managed as a DA by Central Coast Council, questions this application’s progression as a State Significant Development and reiterates its concern that the applicant is seeking to bypass Central Coast Council and go to the Minister for Planning with an SSD application and obtain the solution it wants.

The SSD application claims to ‘Expand and upgrade existing resource recovery facility’, but an existing business operating at this address is not in evidence, nor has it been for some time. This area of the Somersby Industrial Area is effectively Rural Residential and borders schools and public parkland. Nearby residents’ concerns about dust and noise must not be dismissed as resolved.

It is hard to escape the conclusion that residents are viewed as collateral damage to industry needs.

3 Conclusion

The community calls for an immediate halt to the processing of the State Significant Development applications by the Department of Planning and for an inquiry to be held by Central Coast Council into the use of valuable land in the SIP for waste dumping purposes.

Poppe Zouroudis

Secretary

Mountain Districts Association