


Objection and Challenge to Martins Creek Quarry Expansion

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NAG 12 IMPACT AREA



This submission focuses on the quarry and surrounding rural residential area and challenges the basis on which the expansion has been approved by DPE and the data used in the modelling and analysis.

The SSDA and Development Consent fail to adequately address and acknowledge the impacts of the Martin Creek quarry expansion and extension of operations from 5 days per week to 24/7.

Economic Drivers

Challenging the justification on which this proposed expansion has been granted development consent, given:

- Economic downturn since June this year
- Housing market and residential construction is now in significant downturn and likely to continue to decline for at least next 2 – 4 years.
- NSW Government infrastructure plans for regional and state expansions -
All of these are made prior to global economic downturn and a change of Federal Government and NSW PM Leadership
- ONLY \$108 billion has been committed to Infrastructure projects over a four-year period to 2025. (Ref. strategic context)
- This quarry represents <3% of total aggregate quarried in Greater Hunter region.

ROAD Assessment

SSDA 6612 /Para 66 & 67 - Haulage numbers stated exceed per annum extraction rates:

| VEHICLE TYPE / LOADS | 140 trucks per day /50 days | 100 trucks per day /200 days | TOTAL PA |
|---|-----------------------------|------------------------------|-----------|
| Truck and Trailer Carrying 48 Tonnes - PBS Permit | 336,000 | 979,200 | 1,315,200 |
| Truck and Trailer Carrying 32.5 Tonnes - General Access | 227,500 | 663,000 | 890,500 |

New site access proposed on Dungog Rd has blind corners on either side and is at the transition of 80 – 100km speed change

Table 6-2 **incorrectly** states that Dungog Rd is 80km speed limit only

NO vibrational modelling has been provided to show impact to foundations of properties along nominated route – Household Insurances are unlikely to pay-out for foundation damaged caused by road tonnage increases.

Insignificant attention given to hazards of using nominated route – i.e. School Buses, Livestock movement, garbage collection, emergency vehicles and the increased road use due to residential expansion in the last 2 years.

Truck movements figures DO NOT include Coal Ash delivery (20,000 Tpa), construction vehicles or any other deliveries that would be made on a regular basis to the site.

- No indication has been given as to which roads would be used for these additional movements

TRAINS Assessment

SSDA 6612 / Para 99 -105 : States '*there is sufficient network capacity to support increased use of trains; however, if supplying aggregate for general construction, then 24/7 loading would be essential. This would also require 360m extension to existing sidings.*'

Not provided in Development Assessment:

- Justification for 24/7 loading of trains
 - why can't this be achieved during weekdays/ Daytime ONLY?
- Actual daily number and length of trains that are going to be loaded in 24/7 period
- Actual number of train movements in 24-hour period (*noting Development Consent/ A.15 sets max at 6 movements PER DAY*)
- Actual location and development plans for the siding extension (not just a yellow line on figure 2.1)

24/7 LOADING AND MOVEMENTS WILL SUBSTANTIALLY INCREASE NOISE, LIGHT AND DUST POLLUTION LEVELS – ALL OF WHICH WILL BE HIGHLY IMPACTFUL TO ALL RESIDENTS IN ALL NAG AREAS

NOISE Assessment

Deficiencies in SSDA 6612

- Table 6-5 fails to provide daytime operations figures for NAG 12
- What are the baseline noise figures for all NAG areas from existing quarry activity?
- What are the extrapolated and predicted residual impacts for all NAG areas
 - NOT just exceedances
- Data from Daracons' own records and NOT independently attained
- Modelling analysis was by Daracons' consultants and DPE internal consultant
- Independent Analysis initiated Dungog Council and another by MCQAG were NOT considered

Noise isn't containable – this is a quiet rural RESIDENTIAL area with little ambient noise, therefore ALL NAG areas will be impact by constant noise daytime, evening and throughout the night from the expansion

AIR Assessment

SSDA 6612 / Para 162 – *'Daracon's AQIA relied upon a CAL PUFF air dispersion to predict ground-level concentrations'* and
Para 165 - *'dispersion modelling relied on meteorological conditions collected on site'*:

- Again, Daracon figures and NOT from independent sources
- Over what period was the data been captured?
- What upper Atmosphere levels were considered in the modelling?
- What is the modelled dispersion radius of West Pit operations, East Pit Crushing and Loading?

RCS (Respiratory Crystalline Silica) will be dispersed to all properties within and beyond the project and 'NAG areas' meaning:

- Respiratory health of ALL residences in local vicinity will be ADVERSELY affected.
- ALL properties within the vicinity of Martins Creek, Hilldale, Vacy and towards Paterson are on Tank water. This means that all captured HOUSEHOLD water WILL be contaminated.

LIGHT Impacts

SSDA 'Other Issues' Table 6-17: Visual Amenities

- *'Directing lighting away from surrounding residences'*
- Light is omni –directional and therefore CANNOT be contained
- NO modelling has been provided to show the impacts of evening and nightwork (24/7) to properties in ALL NAG areas
- Light is pollution - this has NOT been recognized or acknowledged AT ALL in this SSDA

WATER Assessment

What historic rainfall figures were used to model Surface and Groundwater Impacts?

Data provided ONLY by Applicant NOT by an independent consultant.

With La Niña's predicted to be become more frequent the water containment and management systems outlined in the proposal are inadequate and need to be re-assessed.

Discharge rates would almost certainly need to increase to cope with these rainfall events which would have adverse environmental impacts to landowners downstream.

Clearing operations

SSDA 6612/ Para 235 – *Threatened Fauna/Flora*

Are Daracon truly saying they will have someone on the ground, inspecting every tree before the bulldozer knocks it down?

Then, when spotting a Koala, or any other specie, they will call in a Wildlife specialist to remove it?

OR

are they merely saying they will keep a count of all the endangered wildlife they destroy for Impact Credit reporting?

DPE, by giving their consent to this expansion project, has shown a flagrant Disregard for the **endangered** species that inhabit this project zone.

Development Consent - Inadequacies

The Development Consent doesn't go far enough to protect residents affected by this project:

The current consent for LAWFUL extraction at Martins Creek Quarry is 300,000Tpa – ALL calculations have used an unlawful current baseline 500,000Tpa.

ALL Management or Mitigation plans MUST be completed and approved PRIOR to commencement of development, NOT within 6 months of re-commencement of Operations.

These plans MUST include full Risk Mitigation, Standard Operating Procedures and comprehensive training of all site personnel MUST take place PRIOR to any operations recommencing

ALL owners of privately owned land within ALL 'NAG areas', should be able to request acquisition by Applicant at market rate that would be achieved if the quarry were NOT operating.

For ALL privately owned residences within 5KM radius of the quarry, Applicant should provide, install and maintain high quality water filtration for house-hold tank water.

ALL privately owned properties within 2 Km radius of extraction area and along haulage route should, prior to commencement of development, have baseline inspection of their buildings paid for by the Applicant.

PRIOR to development commencing, ALL residents within 5km of quarry should be able to have a Lung Functionality test paid for by Applicant, for baseline reference against any future cases of RCS related disease. Results of these tests would be held by resident and their practitioner.

Noise isn't contained – this is a quiet rural RESIDENTIAL area with little ambient noise, therefore ALL NAG areas will be impact by constant noise daytime, evening and throughout the night from the expansion