This submission primarily addresses my objection to the movement of product from the quarry by road. I also support fully the objections on social, environmental and ecological grounds that were outlined at the community meeting held on 7 November 2022.

Our residence is located along Tocal Road and opposite a section of the North Coast Rail Line (NCRL). I therefore have a very practical appreciation of the impacts due to both road transport of quarry product from Martins Creek Quarry Project (MCQP) and the use of the NCRL for freight and coal movement as well as limited passenger transport for the last 26 years.

In addition to this practical appreciation, as an environmental scientist having worked in the fields of local government, the mining industry and private consulting I have theoretical and applied experience in the approval process and community consultation.

I contest that the assessment and recommended approval of the haulage of quarry product by the existing substandard rural roads is flawed by the continued use of information contained in the following reports;

* Road Pavement Survey undertaken in May 2018
1. 2018 was the midst of a prolonged drought. 2020 -2022 in contrast has been some of the wettest years on record. The omission of an assessment of the adequacy of the current road pavement, following the above average rainfall, certainly needs to be undertaken.

Current modelling to determine maintenance costs for the life of project, 25 years, would then use the existing pavement condition as the base. Further this data then informs other assessments including the economic assessment and any proposed Voluntary Planning Agreements.

* Traffic Flow data gathered in May 2018
1. Surely the opportunity to undertake a current traffic survey should not be avoided. This would either validate the model projections and/or provide updated data to inform traffic congestion and safety aspects of the Environmental assessment and Submissions report.

The May 2018 report determined that several intersections were if not at saturation, were close during morning and afternoon peaks. The report then goes onto indicate that the increase in traffic numbers pushing the intersections to saturation would be due to increases in general traffic numbers arising from population increases. This would seem to imply that upgrading costs would then fall to government authorities, indirectly the community. Surely this is the opportunity not to increase traffic numbers at least as attributed to MCQP.

* Economic Assessment that has only evaluated the preferred option.
1. The submissions report has indicated that it is only necessary to undertake an Economic assessment of the proposed option.

However, there is almost unanimous support from the community for transport of any product by the existing rail loading facility and the North coast rail line. I would think that to justify the position of road haulage as the only viable project option an option solely of rail haulage needs to be assessed accordingly.

Thereafter comparison of the rail option including the establishment of an unloading, stockpiling and reloading facility can be peer reviewed economically against the road haulage option.

The issue of the location and establishment of an unloading, stockpiling and reloading to road transport has received inadequate assessment. As the world moves away from the use of fossil fuels, it must follow that in whole or part, the materials handling facilities within the industrial lands at the Port of Newcastle

would become redundant and available.

It is acknowledged that work would be required to amend existing facilities. This is the time to explore this option. The location of an unloading, stockpiling and reloading facility within such an industrially zoned lands brings with it access to designated heavy vehicle routes for the movement of product to major arterial and regional roads.

Further, I believe that the proposed product haulage by road when an existing and in the near future underutilised North Coast Rail would not meet Sustainability and Intergenerational Equity Criteria.

* Sustainability
1. The MCQP is connected by an existing and proposed upgraded rail spur to the NCRL. The NCRL is currently a major freight line and to a lesser extent a passenger line. This transport of freight will change at the completion of the Inland Rail. Current predicted completion date 2027.

To not maximise the use of this existing designated transport corridor, that has had substantial upgrades in the last 10 years, does certainly not meet sustainability criteria. The use of the NCRL would also negate the need for proposed road upgrading works and the energy and resources used in the works as proposed to facilitate road haulage.

Also, the potential reuse of existing unloading, stockpiling and reloading facilities goes to the sustainability objectives of reuse and maximising existing infrastructure.

Containment of potential negative impacts relating to noise, dust, safety, and social to the project site, existing freight haulage infrastructure and existing designated heavy industrial areas allows for more effective impact ameliorative measures.

* Intergenerational Equity
1. If the MCQP is approved as currently proposed there would be road transport for the 25 year life of the Quarry. The imbedded CO2 emissions arising from the truck movements along with the ongoing increased road maintenance, safety and other social issues would not meet the concept of fairness amongst generations when considered against the obvious alternative of moving quarry product via an existing rail corridor.

It has not been argued nor proven that the product to be quarried at Martins Creek is in anyway unique and the need for such a material cannot be met at other existing and approved quarries located within the region and more broadly across the NSW.

Due therefore to the issues outlined in this submission and more broadly outlined at the community meeting held on 7 November 2022, I do not believe on balance that the negative impacts that would be experienced by the local community because of the approval of the MCQP as currently proposed would be outweighed by the positive impacts equated to the local and regional community.