

With regard to the application for Modification 3 to PA 07-0155 by Multiquip relating to changes to the current operating approvals for the Ardmore Park quarry we note objections to the application based on several concerns and inadequacies in the environmental assessment in the following key areas;

- Transport Operations;
- Noise;
- Air Quality;
- Waste Management;
- Water Resources; and
- Increased/Expanded Production.

We believe that key objections related to aspects of the above listed key areas will have a significant impact on the quiet enjoyment and lifestyle for the local community in addition to creating an unsafe means of access to the local area through increased heavy vehicle road movements on rural roads.

Of general concern initially is the overall structure of the Multiquip organisation. The proposal notes that they have extensive experience in all aspects of quarry operations however, Ardmore Park is the only quarry listed on their website. This is in contradiction to the information within their proposal suggesting they own three quarries. Multiquip have experience in the manufacture of heavy trailers as well as poultry breeding however, have no significant experience in large total quarry management operations.

### **Transport operations**

The proposal listed a completion date for March 2018 for road work activities on Jerrara Road. The roadworks are currently incomplete and unlikely to be completed by March 2018. This in turn means that Multiquip have been, up until this time, and will continue to be, up until the completion of the road works, unable to operate at full approval capacity under the current licencing arrangement. It is therefore impossible for local residents to make informed decisions about requested future increases without yet experiencing or understanding the impact that the agreed operations will have on the current quiet amenity and travel on local roads. This also means that it will be extremely difficult to verify the ongoing road surface conditions and ease of travel using the current truck fleet.

Jerrara Road is a quiet rural road with reasonable undulations and ongoing curves and winds. There are large volumes of wildlife in the area with low visibility due to the curves and undulations of the road. There is limited mobile phone coverage with many areas of the road in black spots and no areas to pass long vehicles safely. The proposed hours of travel would further exacerbate the above risks by adding the darkness and, throughout the winter months, very regular heavy fog for the entire length of the transport route. In addition, the winding curvy nature of the road combined with the proposed longer trucks will require the trucks to veer onto the other side of the road to negotiate the tighter bends increasing the safety risk to oncoming traffic that will be forced to take evasive action to avoid collision.

The traffic management study conducted was, we believe, inadequate. It was conducted on a single day during the summer months over the Christmas period when many children had already completed their school and extra-curricular activities for the year thus potentially reducing the traffic movements. A more thorough traffic management study (including daily weather conditions) over a longer duration through various months of the year would yield a more comprehensive and accurate representation of the traffic movements.

The hours of travel proposed are unsuitable and unreasonable. Other similar operations within the local area (such as the Hi-Quality, Windellama operation) are not permitted to transport during the extended hours proposed by Multiquip. By accepting further extended hours it would set a precedent for future expansions or other operations seeking to commence operations in the region.

The indicative traffic movements suggest that a majority of the movements will be in the early and late hours whilst local residents are travelling to and from work to suit Multiquip's operation. This does not suit the local community, is unreasonable and puts an extra burden on an already fragile and difficult commute at dawn and dusk when wildlife are most active.

The proposal indicates that the extended hours allow for better scheduling of truck movements. This is surely referring to Multiquip's ability to get trucks to a Sydney market as it doesn't in any way benefit the location community and only appears to benefit Multiquip's profit margin.

A statement noting that restrictions will be placed on truck movements outside the hours of 7am to 6pm seems to be there to appease the community and does not provide any substance on how it will be enforced or managed. This is in stark contradiction to the estimated movements of 10 trucks per hour outside of the 7am to 6pm window. If there were indeed 10 trucks per hour during these extended windows this would equate to a majority of the movements per day occurring during these times. This doesn't indicate a managed approach on Multiquip's behalf.

The indicative traffic levels are also only relevant if the proposed larger trucks are used for more than 80% of the time. If the larger trucks are not used, what increase would this then have on the number of truck movements? This doesn't seem to support the suggestion by Multiquip that significant efforts have been made to reduce the impacts on the transport route for residents.

In short, the suggestion by Multiquip that the increase in production, higher traffic movements and increased hours of travel could have limited effect on local amenity is not in alignment. A reasonable person knows that where production increases and hours of movements are extended there is going to be a significant direct impact on the community and other regular daily road users.

### **Noise**

The proposal indicates that noise levels will increase marginally. It does not however indicate what these levels would increase to. If the current production is below the level of the existing approvals how could a realistic indication of the increase be arrived at?

### **Air quality**

The initial picture of the operation submitted with the application does not indicate that Multiquip already have full control on dust management even whilst the site is not yet fully operational. If further expansions and greater truck movements are included, how can residents be fully aware of what the increase could likely be without firstly understanding the effects under the current agreed operating conditions?

### **Water resources**

The proposal notes the requirement to wash materials to produce certain products however fails to verify volumes of water required, location of where water is sourced from or more importantly, leachate management.

With increased production there will be an increased requirement for water. The current environment in the area is dry and arid with a history of long periods of drought. What long term effect will the required water usage for production have on the access to water sources for the community and overall for the Sydney Water catchment.

### **Waste management**

The request to further extend the backfilling material to include ENM in addition to the current approval for VENM is intriguing. In order to backfill the proposed pit, it is first important that the pit has reached depth in order to commence backfilling. These two products are generally understood to be used as capping material for waste and rubbish pits. Given the pit is in its infancy and has yet to reach full production at the current approval limits with a pit life of over 40 years, where are these products going to be stockpiled in the interim? How large will the stockpiles need to be to accept the volumes

anticipated? Do Multiquip plan on requesting a further expansion in the near future to also accept waste material?

Further to the above, there are limited details provided to better understand the ENM proposed. Aspects such as the source of the ENM, certification and specifications are not provided. These are reasonable items to better understand by the local community before they can be satisfied that out of specification products can be managed to avoid being brought into the local area.

The proposal indicates that ENM will also be used for blending to create specialised products however, there is no further detail on what these specialised products may be nor an indication on the specifications associated with these specialised products. What is the market for these specialised products? The information provided relating to the acceptance of ENM is vague and limited.

Finally, there are limited details provided to give assurance on the sampling and quality requirements associated with the materials being received and leaving the operation. A formal quality management system needs to be included to verify management of materials associated with the operation.

Additional waste management concerns include the servicing of mobile equipment offsite. This means that oversize floats will also be required to travel regularly on the transport route to access offsite servicing facilities. There is no indication on the timing of these activities or restrictions noted to prevent an impact on the local traffic. Similarly, the concerns related to the additional truck movements above regarding the nature of Jerrara Road apply to these movements.

Waste management of hydrocarbons notes in the proposal that hydrocarbons will “generally” be removed. This does not provide any comfort or assurance that hydrocarbons will be managed and physically removed from the site. Further review of the management plan for hydrocarbons needs to be conducted.

The site management facilities indicated in the proposal mention the use of an existing septic system associated with the residence being used as the office location. Has the septic system been reviewed and verified to ensure it has the capacity to meet the requirements of the proposed personnel working on site rather than the initial intended residential purpose?

### **Increase production**

Within the proposal Multiquip note the request for increased volumes however, do not provide any information as to how volumes will be managed. To our knowledge there is no weighbridge on site therefore volumes are not able to be managed accurately. This therefore limits the ability to legally manage volumes and could result in lack of evidence of individual movements. How can the community be sure that the agreed extraction volumes are not being breached if there is no accurate evidence or accountability?

The proposal fails to mention details of the downstream market proposed by Multiquip. Given there are local quarries closer to and on the highway with the ability to produce larger volumes, more specialised products and have better infrastructure and more reliable production. What competitive advantage does Multiquip have that would encourage customers to pay a premium for a lesser quality product from farther afield?

The proposed bitumen plant information suggests that there have been potential customer enquiries. Given the distance from larger communities in the area it would be interesting to better understand the proposed market for this plant in addition to how road movements would be managed and how the volume of 20,000 tonnes would be managed to ensure it is not exceeded.

For a hard rock quarry it is very interesting that Multiquip have indicated that there will be no need to conduct blasting activities. Has there been a thorough resource drilling program conducted to be certain that future blasting will not be required in order to access resources? Given the proposed volumes it appears that it would be very difficult to achieve the volumes into the future without blasting.

Lastly, with the increased production, Multiquip indicates that they would like the ability to conduct maintenance on a 24 hour per day 7 day per week basis. There is little indication of how this will be managed and the indicative frequencies of these activities. Surely these activities can be planned and managed to be conducted during less hours than a 24/7 basis as occurs with any organised and functional business.

We believe that these above item presents a significant impact on the quiet amenity of the local community and must be further reviewed and amended by Multiquip to develop a more reasonable proposal at a more suitable time where the community can make informed decisions based on real experiences and operational information.