

We are proud to be long-standing members of a community that has worked so hard to protect its important heritage and enhance its cultural, social and environmental wellbeing. Bearing in mind the State Environmental Planning Policy's stated purpose of "promoting the social and economic welfare of the State" I submit that since inception the quarry operations have already negatively impacted local residents, and that the Ardmore Park Modification 3 proposal would further harm the amenity and economic welfare of the local community.

A WATER ACCESS

The original consent allowed only 70ML allocation, despite the proponents (under their previous trading name) requesting 200. 200ML was declared unsustainable and specifically denied. Since then the allocation has been increased to 100ml, and local farmers report that their water access is severely impacted, to the extent that their ability to feed livestock - their livelihood - is impaired. Thus the future of Bungonia as a rural community with working farmers is at risk. Multi-Quip has now acquired a further 100ML allocation from the same aquifer. The potential consequences for other users of the aquifer are dire.

Further, the proposal demands "scientifically and independently demonstrated significant impact on any neighbouring users that can with available scientific data be attributed to the quarry operations" before the proponents will take any steps to address the situation. According to mining experts consulted, this clause is in opposition to proper mining and quarrying practice, which holds that it is the responsibility of the mine or quarry operators to demonstrate no adverse impact on other water users.

MultiQuip is no doubt aware that were local residents to believe the responsibility was theirs to prove impact, and seek independent scientific data, this would cost about \$100,000. This clause has punitive and intimidatory implications which do nothing to increase trust between the proponents and local residents.

B WATER RE-USE AND MONITORING

The proponents state that 50-75% of water used in sandwashing is "available for re-use". How much is currently being re-used? There are questions around how the accuracy of self-monitoring can be proven in regards to both water extraction and water recycling and re-use. Elsewhere MultiQuip suggests that stored water in dams is a resource for the future. Firstly, dam water in this very windy area is subject to much evaporation, and secondly, since the proponent is seeking an operational extension of 30 years, if the land is sold on in 30 years, how is this a benefit to residents currently?

C BITUMEN PRE-COATING PLANT

The Amendment 3 proposes a "small" bitumen pre-coating plant. The MultiQuip representatives would not put a quantity on "small". Clearly such an ambiguous term is unacceptable. The community cannot make a proper response without specific numbers. The representatives suggested it was for "local customers". What would then the haul route be and what pollution controls on the hauliers themselves if local customers?

The proponents have not indicated what the water usage would be for this new process. Further, if the pre-coated product is not used within a certain time, it has to be rewashed. There are toxins involved in this processing, storage, re-coating and disposal, and the community is entitled to know what pollution risks there are to their environment.

Again, if the processes are entirely dependant on self-monitoring, there are questions about how this self-monitoring will be assessed. Specifically, does the Department of Planning have adequate resources to assure the local community of compliance by MultiQuip in every aspect of its operation?

D INCREASED TRUCK MOVEMENTS AND JERRARA ROAD

80% of the southbound lane of Jerrara Road is still unimproved. When we travelled homewards south on Jerrara Road on a Monday at about 4 pm, in the space of 20 minutes we saw 6 laden trucks travelling north. On the unimproved section, we were forced off the pavement onto the shoulder by a truck travelling north, in order to avoid a collision. We understand other local road users have experienced this. It is impossible to know which trucks are carrying material for road construction (which have no control on numbers), and which are carrying quarry product. Again we must ask how Planning is monitoring how much quarry product is currently being trucked out. With bridges one-way, clearly the potential for accidents is greatly increased.

No count of road usage on Jerrara Road has been made by the Proponents in recent years. Visual evidence from locals states that since the completion of the concrete bridge over the Shoalhaven, vehicle density - particularly of heavy vehicles - has markedly increased. It would seem irresponsible to approve increased density of quarry trucks during certain hours without either the roadwork being completed, bridges made 2-way, or any knowledge of the traffic now carried on Jerrara Road.

MultiQuip is planning a fleet of technically up-to-date trucks with satellite speed monitoring. (We are unaware how many they have now, how many older trucks they are still using, and what percentage of the haul is carried by subcontractors.) The dogs on these new b-doubles are 1-1/2 metres longer than their current trucks. While that may not sound a great deal on one truck, with many trucks moving on a hilly country road at with many bends and narrow bridges, at 80 kph and needing considerable distance to come to a stop, this is yet another hazard. Further, a lot of tourists using this road are unfamiliar with the conditions and the fact it is a haul route.

E INCREASED HOURS OF OPERATION

How is it possible that residents near the haul route will NOT be negatively impacted by truck movements starting very early and continuing until very late? There is bound to be increased light and noise pollution. Also, operating in longer hours of darkness on a country road not only increases the danger of accident, but poses a much greater risk to wildlife. It is not credible that wildlife deaths on the haul route would not significantly increase.

F REPLACEMENT OF SECTION 94 CONTRIBUTIONS WITH A VPA

It seems that the Proponents will seek a Voluntary Planning Agreement with Council, to replace their Section 94 financial obligations to road upkeep. Since the public and ratepayers apparently have no right of access to the terms of such a VPA, despite its potential impact on the community and environment, it is open to supposition that the proposed bitumen precoating plant might feature in such an agreement, with the proponent selling precoated bitumen at commercial rates to Council. This is a cause of anxiety given the questions raised about the proposed plant. Since local government is answerable to State, we seek assurance that any VPA relating to this proponent be open to public scrutiny.