

Submission against the development of the Monaro Rock Quarry Project in Royalla.

I am writing to object to the approval of the above project, currently under consideration by NSW planning and development as a Major Project.

I (along with many of my neighbours) am gravely concerned about the potential detrimental impacts upon the health of the residents of the Lanyon Valley; exacerbation of the existing difficulties with transport in and out of this valley; and the negative effect on the general community wellbeing that this project will inflict. I/we also consider that the location of this project, only 3km from the suburbs of southern Tuggeranong in the ACT, is completely inappropriate for an industrial project of this size, and duration.

I also understand that there are very serious environmental impacts upon an area of critically endangered vegetation, the health of local waterways and the biodiversity of the region to be considered, however as I am not well acquainted with the details of those issues, I will leave comment on that topic to those who are.

As a resident of the Lanyon Valley for over 20 years, I understand this region and its topography from the point of view of someone who walks through the suburbs every day, spends a large amount of time in my garden and on the local playing fields, bushwalks in the surrounding hills regularly and is a member of a number of local community groups. One of the reasons that people choose to live in this valley (which is pretty much as far away from the city centre as a resident of Canberra can be) is that they seek the peace which it provides, access to the unspoiled areas of Namadgi National Park and Canberra's other bush-backyard reserves (such as the nearby Roby Roy reserve), and they are willing to exchange transport time and amenities for that privilege. It is that peace and quiet, and relationship with the surrounding natural environment that gives the southern edge of the ACT its unique personality and its core character.

This Major Project will negatively impact the character of this region, and the lives of the 30k people who live within 10km of said project, for 3 decades or more. Or in terms of human habitation, at least 2 generations of residents. This impact will be in exchange for a slightly more expedient length of travel time for a product which could very easily be sourced from a far more reasonable, and far less impactful location (perhaps indeed from one of the other underutilised quarries in the region?)... and undoubtedly a substantial profit for the developers. This is not a reasonable, or even a conceivable, trade-off of priorities.

Having been alerted to the intended construction of this Major Project in our immediate vicinity in only the last week, I (and my neighbours) have trawled through the proposal documents as quickly and effectively as any group of total lay people can. And what is abundantly clear to all of us, is that each of the reports tabled as part of the proposal are riddled with assumptions, disclaimers, approximations, mitigations and are written with the financial advantage of the developer in mind.

The Social Impact Assessment Report (SIA) seeks to assess the community's attitude towards this project, based on a number of 'focus groups'. At this point I feel it is important to note that as someone living within 5km of the quarry and processing plant included in this Major Project proposal, I was only made aware of its existence when I decided to find out what the corflutes near my local shops were all about... To my horror I discovered that the opportunity to object to

something which my family and I would be strongly opposed to had almost slipped past completely without our knowing about it. A few quick messages to, and front yard chats with, our neighbours revealed that the same was true for every one of them. Most of them immediately headed inside to their laptops in order to make their submissions in the little time that they had left.

Naturally, I have retained screen caps of all communications with all my fellow residents in the Lanyon Valley who responded to my query about their knowledge of the proposal with 'what quarry?', for future reference.

My point here is that this SIA is really not worth the paper it is printed on. I consider myself to be a reasonably well-connected member of the community and a consumer of local news from a number of different sources, and I had absolutely no idea that this proposal had been tabled or that submissions were being sought.

While focus groups may have been conducted in order to satisfy the requirements of the report and tick that requisite box, the VAST majority of residents quietly enjoying their lives in Banks, Gordon, Conder, Theodore and Calwell would have been none the wiser that this Major Project was about to drop into their back yards (and onto the washing on their lines, the playing fields they train on and the roads they travel on everyday), unless someone they know dropped it into their DM's or discussed it with them in the school car park. I wager that if you actually ran a referendum in these suburbs as to whether this Major Project should proceed in the suggested location, the result would be a total and resounding rejection of same.

If in fact this proposal should receive approval at the Enchanted Hill location (a situation which is incomprehensible to everyone I know), I suspect that that would very likely be the next course of action for the residents of these suburbs, in the form of a petition to the Federal Government.

The reasons for this rejection of this Major Project proposal by the people living in southern Tuggeranong are many, but I will highlight a selection of them here, assured that others across the region are also addressing the issues which will personally impact their own families and the lives of the people that they care about.

Firstly, I would like to take issue with statement in the proposal documents that the residents in the suburbs of southern Tuggeranong 'will be peripherally aware of the project due to increased traffic movements and sporadic audible blasting'...

Addressing the first of these highly minimized statements, first.

'Increased traffic movements' is a laughable description of what the proposal's own documents indicate will be 25 fully laden B-double trucks per hour, up to a maximum of 200 fully laden B-double trucks a day, along the Monaro Highway. This would represent between 2-3 fully laden B-double trucks every minute, in each direction (as the documents note double that amount in terms of 'trips') along a road which is used every single day by a large number of the people who live in the Tuggeranong Valley. This is not an 'increased traffic movement'. This is a total takeover of a major arterial road, which, it is worth noting, is often already at a crawl or a standstill during peak hour and school pickup times.

The SIA also references an amendment which would need to be made to facilitate a dedicated road to link to the Major Project to the Monaro Highway to avoid the use of 'local roads'...

This is a provision which was undoubtedly suggested not only to try to appease the poor people of Royalla, but also to reduce transport complications for the company seeking to achieve maximum profit from the project. And once again, this is completely tone deaf in terms of the nature of the use of the road system by the residents of the Tuggeranong community.

What the study and its authors fail to appreciate is that for the people of southern Tuggeranong, the Monaro Highway IS a 'local road'.

Our families utilise it to get to work, and school, and as an arterial link to the City and North Canberra. As previously stated, this road is already extremely congested at peak travel hours during the morning and evening rush hours, and during school pick-up and drop-off times. The prospect of adding an additional 200 B-Double trucks to this road (and, as is embedded in other places in the EIS documents, another 50 concrete trucks a day, each way), is completely ludicrous. It will quite simply render the road unusable for the residents who pay taxes for its maintenance and will force them onto the already overburdened Tuggeranong parkway for their regular daily commutes. This huge problem will then fall back into the lap of the ACT Government to rectify, adding further to the burden paid for this project by the ACT taxpayer.

On top of this logistical impossibility, the Monaro is also a highlighted black-spot highway in its present form, without the addition of 200 (and 50) fully laden B-double trucks a day. The highway was named as Canberra's worst crash site in the AAMI Crash Index of 2023. It 'slipped' to second place in the Territory in 2024, but there's no avoiding the reality around the very high number of fatal car accidents which have occurred along the stretch of the highway between the roundabout at Tharwa drive and bend at Lanyon Drive. This stretch of road is well known in the community as a death trap, and it is exactly the stretch that this project will propose to place 200 fully laden B-double trucks upon, six days of every week, for 30 years... It's simply preposterous.

One very notable recent death on this stretch of highway which I'd like to highlight here occurred in 2018 when four year old Blake Corney was crushed while seated in the back seat of his family's car, when the driver of a truck rammed into them while they were stopped at a red light at the intersection to Mugga Lane... The coroners court found that the commercial driver of the truck was guilty of culpable driving causing the death of this innocent child. Any politician, anywhere, who believes that the addition of this level of industrial traffic onto an already heavily used road (which has this kind of accident history) could be acceptable to local people, is really not reading the mood of the constituency.

Moving on to the topic of 'sporadic audible blasting', it is noted in documents tabled with the proposal that the word 'sporadic' is being used to describe a process which will occur at least weekly. So each week there will be a booming sound which will no doubt trigger a variety of responses in people right across the southern reaches of the valley. Anyone who experiences PTSD will be impacted in one way. Those who have pet friends will be impacted in another. Those who have children whom they know are out on the school playground only 3km from the blast will likely feel their blood run cold. And many, like myself and my neighbours will be thinking 'ok, maybe it's time to get the washing in and head inside for a few hours at least', or, 'which way is the wind blowing today', or, 'I should probably go for my walk today with a mask in my pocket because they haven't done any blasting yet this week'. This kind of interference in our daily lives is certainly not what people signed up for when they chose to live in the relative peace and quiet of the southern suburbs of Tuggeranong.

While on the topic of all things audible, I note that on page 42 of the SIA, under the heading of Transport (Perceptual), it is stated that 'truck movements may be perceptible in some parts of Tuggeranong (less than 5km) but actual traffic impact modelling focuses within 1.5km'. To which I have to respond that this also speaks very adversely to their claim that community engagement is a part of the focus of this planning process. If the writers of the supporting documents 'note' that truck movements may be perceptible in some parts of Tuggeranong, and that those truck movements will be occurring all day long from 7 in the morning until 6 in the evening, but then choose not to focus upon that (perhaps because of the number of residents they would then be forced to acknowledge are being impacted)... then from the perspective of those neglected individuals, the assurances given on many fronts continue to lack any kind of credibility or authenticity.

This leads me to my/our concerns over the assurances in the EIS about the airborne pollutants that may be added to the air the residents of the southern suburbs of Tuggeranong will be breathing for the next 3 decades, should the proposal go ahead. I am forced to admit at this point that digesting the hundreds of pages of the EIS within a 48 hour window was a task which necessitated a lot less research time than we would have liked. However, from what we did glean I make the following observations...

Hard rock quarries like this one create silica dust. That is not in dispute and is addressed in many different ways in the EIS. Silica dust creates Silicosis. Also not in dispute. There are many references from health sites across the internet and across the world which note that Silicosis is regularly seen around mining and construction sites (just like this one). It is also regularly referenced that silicosis can happen quickly with high level of exposure, or over a longer period of time due to low level, long term exposure.

The EIS supporting the proposal for this Major Project does not dispute the fact that levels of Respiratory Crystalline Silica (RCS) in the air that we breathe in southern Tuggeranong will be increased. It simply says that it will be within acceptable levels (stating a variety of measures and comparables in other locations, because apparently NSW EPA do not provide air quality criteria for RCS...). But it does so by using wind measurements from the Isabella Plains weather station (which is completely unrepresentative of wind patterns experienced in the Lanyon Valley) and by citing a series of 'preventative measures' which will reduce the potential air pollution by 'up to 90%'. These measures include:

- Watering the road surface;
- Applying chemical suppressants;
- Ensuring stockpile moisture content is measured and controlled;
- Progressive rehabilitation of the area;
- The use of fabric filters on drill rigs;
- Minimising the drop height from trucks when unloading;
- The use of a reverse pulse filter on the raw material silos at the concrete batching and asphalt plant;
- The use of dust shrouds when concrete blending;
- Enclosing the area around the concrete agitator truck; and,
- Covering the loads of fully-laden B-double trucks carrying silica-containing material along the length of the Monaro highway 200 times a day.

That all sounds very professional... however, given that even under these ideal circumstances our air quality will still be degraded, and, should even one of these preventative measures be

quietly considered too expensive or too time consuming by the operators, it would seem pretty clear that the 'acceptable levels' of the impact upon the breathability of the air in the southern suburbs of Tuggeranong will be at serious risk.

Research conducted in the United States on the use of the type of chemical suppressants noted in the EIS for the proposal above have still more to say on the dangers of RCA to neighbouring communities. One of the manufacturers of such chemical suppressants notes the following on their website: <https://www.nosilicadust.com/how-far-can-respirable-dust-actually-travel/>

- 'Unfortunately, the nature of respirable dust particles can put bystanders at risk of inhalation exposure far beyond the confines of the construction site.'
- 'Failing to properly control silica dust affects not only the construction crew, but people in the surrounding areas- in some cases as far as 50 miles from the site.'

Very Concerning.

And on page 65 of the SIA, the author of the report makes reference to a worst-case scenario where 'dust, noise and vibration exceed modelled limits due to ineffective controls or poor compliance'. I certainly think we have all heard a great many stories of commercial operators who have been guilty of exactly that kind of 'poor compliance', with devastating effects on the residents who have had the misfortune of being impacted by their negligence. Considering the stated 'up-sides' of this proposal being a slightly more efficient transportation time for an in-demand construction product, a cash splash into the pockets of the NSW economy (principally, the operators) and a grand total of approx. 30 jobs (14-20 full-time positions and another 10 in the transportation sector), I genuinely don't believe that anyone in the southern suburbs of Tuggeranong would consider stepping up to the role of canary in a coal mine for the cause.

It also has to be noted, that when discussing the adverse impacts on air quality the duration of this project must come into very sharp focus. When every piece of literature on RCS and silicosis talks about cumulative effects of exposure, the increased pollution caused by this Major Project, in the southern suburbs of Tuggeranong, over a period of 30 years can not be waived away as 'acceptable'. It simply doesn't pass the pub test to suggest that no individuals living within 10kms of this Quarry (some 30K people) will not have their respiratory health adversely affected by it. And for what? Once again, the benefits do not outweigh the risks.

It is also interesting to note at this point that in Table 14 of the SIA the Long Term Health profile of the population of Royalla, and the population of Queanbeyan are tabulated, but no mention is made at all of the health profile of the population of the southern suburbs of Tuggeranong... Apparently the size of the population just over the hill from the project was daunting and/or did not meet with the requirements of the reports consultation process on many levels.

I feel absolutely certain that if a poll was taken in the carpark of the Theodore public school as to whether the parents were happy that over the 7 years that their children were out on the playground they might be subjected to the airborne RCS created by 280 blasts (1 a week for 40 weeks a year) at the Quarry less than 5km away, that they might just be up in arms in very prompt fashion. As noted above, it simply does not pass the pub test.

Although apparently that doesn't significantly concern the developer, nor the author of their EIS, given that at pages 54 and 55 they state that 'not proceeding would avoid some residual environmental and social impacts, however these have been assessed as low and manageable within the proposed safeguards'... and 'while technical assessments and risk analyses suggest

that the residual impact of the project are acceptable these assessment outcomes are not expected to satisfy all community members'... and 'it is recognised that social acceptability will remain contested and that the burden lies with the applicant to earn and maintain community trust'...

Probably an excellent place to pause and note that as a representative of one of the 'residual social impacts' – that being my entire neighbourhood – who has been assessed as 'manageable', that perhaps discovering about the very existence of this Major Project, 3.5km from our garden gate, was probably not a great step in 'earning and maintaining community trust'... and perhaps quite indicative of what we can expect from this project going forward.

To that end it is conceivable/likely that there will be far more submissions made against this Major Project than there will be jobs created by it. It is far more likely that the impact on the community 10km (and even 30km) surrounding this Major Project will be significantly detrimental, rather than in any way beneficial. It is far more likely that amongst the 30K people living within a 10km radius of this project there will be many who suffer significant health, lifestyle and safety impacts, than not. It is far more likely that living in the southern suburbs of Tuggeranong will be made less appealing by the noise, pollution and traffic problems caused by this Major Project, than not.

Thirty thousand people, will be inconvenienced, disadvantaged, harmed, or worse, by this project... for 30 years... for a grand total of 30 jobs.

It simply does not stack up.

I hope you will seriously consider the voices of the people of the southern suburbs of the Tuggeranong Valley in your assessment of this proposal. And reject it completely.

Regards,

[REDACTED]

(And Street, And Neighbourhood).