

Submission to NSW Planning – Objection to the Monaro Rock Quarry (SSD-27223807)

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1) Summary position

I strongly object to the Monaro Rock Quarry at Enchanted Hill. The EIS itself confirms this is not a small quarry: it is a 30–35 year, multi-facility **industrial complex** (quarry + **concrete batching plant + asphalt plant + concrete recycling**) on the edge of a rural community. The scale, duration and ancillary plants are incompatible with Royalla's rural residential character and will impose unacceptable environmental, health, traffic and amenity impacts.

2) Scale and duration far beyond a "quarry"

- **Project life:** The EIS seeks **35 years** of operations plus 3–5 years of rehabilitation. That is effectively permanent for the current community.
- **Ancillary plants:** Proponent seeks approval for a concrete batching plant (up to **50,000 m³/yr** and **50 agitator loads/day**) and an asphalt plant (up to **50,000 t/yr, 1,000 t/day in campaigns**). These are not minor; they greatly intensify industrial activity and heavy-vehicle traffic.

3) Traffic and safety risks

- The EIS allows **up to 200 laden heavy-vehicle loads/day** (with a cap of **25 loads/hour**), plus up to **50 concrete agitator loads/day**. Even using the proponent's own limits, that is an extreme traffic burden on the Monaro Highway and local approaches, with significant safety and noise consequences for residents, school buses and cyclists.
- The quarry relies on a new **Quarry Access Road** crossing the disused rail line to connect to the Monaro Highway, shifting an industrial freight task into a rural setting and increasing cumulative impacts over decades.

Ask: Independent road safety audit; modelling of peak-hour, weekend and campaign traffic (asphalt/concrete) and cumulative growth; and refusal unless impacts can be objectively contained (they cannot be, given the volumes sought).

4) Dust, health and water

- **Dust & silica risk:** With blasting, crushing, stockpiles, truck movements and two ancillary plants, the risk of PM₁₀/PM_{2.5} and **respirable crystalline silica** exposure is obvious and persists for 3+ decades, especially for rainwater-tank households. (Refer to EIS Air Quality, HHRA sections and mitigation reliance.)
- **Water demand:** The EIS estimates **~12 ML/yr** for access-road dust suppression **plus 5–13 ML/yr** for operational areas, **and up to 9 ML/yr** for concrete production, excluding evaporation/infiltration losses. This is a large and ongoing take in a drying climate, with reliance on dams, sediment basins and a production bore.
- **Harvestable right dams:** The proponent relies on building out to a **Maximum Harvestable Right Dam Capacity of 38.71 ML** on the property, plus groundwater and external tankers. This signals sustained extraction to sustain industrial dust control and plant operations — an inappropriate demand in this catchment.

Ask: Refuse the application on precautionary grounds given long-term health and catchment risks, and the proponent's dependence on continuous water extraction to meet even "mitigated" dust performance.

5) Biodiversity, threatened ecological communities & cultural heritage

- The EIS maps **22.44 ha** of **critically endangered Box-Gum Woodland** within the site — part of **77+ ha** of native vegetation affected. Destruction/fragmentation of this TEC is inconsistent with the objects of the EP&A Act and the principles of ESD.
- The assessment acknowledges Aboriginal cultural values/artefacts in the landscape, alongside ring and scar trees in the locality — impacts here are irreversible once clearing and blasting begin. (Refer EIS Aboriginal Heritage section.)

Ask: Refuse due to significant residual impacts on a **critically endangered** TEC and Aboriginal heritage values that cannot be genuinely offset at this location.

6) Questionable "need" and alternatives

- The "need" case relies on a very coarse demand proxy (**4.2 t/person/year**) and long-range population projections. Even the EIS concedes this rests on **assumptions** (e.g., future construction methods) and that other scenarios still

show shortfalls even **with** this quarry — i.e., the model is not dispositive of site suitability.

- Meanwhile, multiple established quarries already supply the region; this proposal simply relocates an industrial burden to the Royalla community while adding two more plants (asphalt and concrete) at the pit. (See EIS demand/supply discussion.)

Ask: Give minimal weight to speculative regional demand modelling; give determinative weight to certain, localised, long-term harm.

7) Social impact and amenity

Over 30–35 years, continuous blasting, truck movements, campaign asphalt operations and night/early-morning works will **permanently alter** Royalla's rural amenity, depress property values and impose chronic noise/stress on families. The EIS proposes "mitigation," but not elimination, of these harms; for a rural-residential area, the residual impact is unacceptable.

Conclusion

On its own evidence, the EIS proposes a large, multi-decade industrial precinct beside a rural community, with heavy traffic, significant water demand, dust/silica risk, and the clearing of **critically endangered woodland**. The proposal is **incompatible** with surrounding land uses, **unjustified** by speculative demand, and **contrary** to the public interest.

Furthermore, the traffic and operational figures presented in the EIS are highly likely to be exceeded in practice. Counting and enforcing a limit of "200 laden truck loads plus 50 agitator loads per day" would be extremely difficult over a 35-year operating life, especially when combined with campaign operations for asphalt production.

Community information sessions indicate a consensus that **actual movements could approach 500 per day**, which aligns with the scale of production being sought. It is unreasonable to expose residents to this level of uncertainty, noise, dust, and safety risk for decades with no realistic way to monitor and cap daily truck volumes.

I respectfully request refusal of SSD-27223807.

Sincerely,

Paul Bain