

Submission Objecting to Proposed Quarry Development

Re: Development Application for Proposed Quarry

I respectfully object to the proposed quarry development on the grounds that the application has not adequately demonstrated that the environmental, traffic and community impacts can be appropriately managed throughout the life of the project.

My concerns relate principally to traffic and road safety, haulage route enforcement, road infrastructure, noise, dust and the absence of adequate baseline environmental monitoring.

1. Traffic Impacts

The proposal involves approximately 110 B-double truck movements in each direction per day. This represents a substantial increase in heavy vehicle traffic on roads currently shared by local residents, school buses, agricultural machinery, tourists and emergency vehicles.

The Traffic Impact Assessment appears to assume that these movements can occur safely. However, it has not demonstrated that the existing road network was designed to safely accommodate this level of heavy vehicle traffic over the long term.

I request that the consent authority require an independent Road Safety Audit addressing:

- road geometry;
- intersection safety;
- overtaking opportunities;
- stopping sight distances;
- bridge capacity;
- cumulative traffic growth;
- crash history; and
- impacts on vulnerable road users.

2. Haulage Route Enforcement

A significant concern is that the nominated haulage route appears to rely largely on the operator's intention rather than on a practical and enforceable mechanism.

Given the expected increase in demand for quarry products associated with ongoing infrastructure projects, bridge upgrades and future development throughout the Lower Hunter region, it is entirely foreseeable that haulage patterns may change over time.

Commercial pressures, changes in road conditions or future contracts may encourage greater use of alternative routes, including roads passing directly by residential properties.

The application has not adequately demonstrated:

- how haulage routes will be monitored;
- how compliance will be enforced;
- what penalties will apply for breaches;
- how the community will be informed of non-compliance; or
- who will be responsible for enforcement over the life of the quarry.

Without a robust and enforceable compliance mechanism, predicted traffic impacts cannot be relied upon.

3. One-Lane Bridge and Network Resilience

The proposed haulage network appears to rely upon an ageing one-lane bridge.

The application does not explain:

- what occurs when the bridge requires maintenance;
- what occurs if emergency repairs become necessary;
- what approved detour route would be used;
- whether those alternative roads have been assessed for B-double traffic; or
- whether those alternative routes would increase impacts on other communities.

This represents a significant omission.

Traffic modelling should assess not only normal operating conditions but also foreseeable maintenance closures, incidents and emergency detours.

4. Road Maintenance

Heavy vehicle traffic inevitably accelerates pavement deterioration.

The application should clearly identify:

- responsibility for future maintenance costs;
- road condition monitoring before operations commence;
- ongoing independent road condition inspections; and
- financial arrangements ensuring that road users and ratepayers do not bear the cost of damage caused by quarry traffic.

5. Noise

The application appears to rely primarily upon predicted noise modelling.

However, there is no independently verified baseline noise monitoring against which future compliance can be measured.

Without baseline data collected before quarry operations commence, it will be difficult to objectively determine whether operational noise exceeds approved limits.

Independent baseline monitoring should be undertaken before any approval is granted, followed by continuous monitoring throughout the life of the quarry, with results made publicly available.

6. Dust and Air Quality

The same concern applies to dust monitoring.

The application should establish baseline measurements for PM10, PM2.5 and deposited dust before operations commence.

Without baseline information, future compliance cannot be objectively assessed.

Monitoring should be continuous, independently audited and publicly reported.

7. Cumulative Impacts

The assessment should consider cumulative impacts rather than examining this proposal in isolation.

Future growth in quarry production throughout the Lower Hunter region, increasing freight demand and ongoing infrastructure projects are likely to increase heavy vehicle traffic over time.

The assessment should therefore evaluate long-term cumulative impacts on:

- traffic;
- road safety;
- road maintenance;
- noise;
- dust; and
- residential amenity.

Conclusion

The current assessment leaves significant uncertainty regarding the long-term impacts of the proposal.

In particular, there is insufficient evidence that:

- haulage routes can be effectively enforced;
- road infrastructure is suitable over the life of the quarry;
- contingency arrangements exist for bridge maintenance or closures;
- baseline environmental conditions have been properly established; and
- long-term monitoring and compliance can be independently verified.

For these reasons, I respectfully request that the consent authority refuse the application unless these matters are comprehensively addressed through further independent assessment and enforceable conditions of consent.

If the quarry is expected to operate for decades, the assessment should not assume today's traffic volumes will remain static. It should model background traffic growth, future quarry demand in the Lower Hunter, and the cumulative effect of other approved developments. Otherwise, the projected impacts may significantly understate the real conditions that residents will experience.

While my property is located approximately three kilometres from the proposed quarry, the principal impacts arise from the proposed haulage route rather than the extraction area itself. The Environmental Impact Statement appears to focus primarily on impacts at the quarry site and gives comparatively limited consideration to the long-term effects on residents located along the transport corridor. Increased heavy vehicle movements will directly affect residents through traffic noise, vibration, road safety risks, diesel emissions and dust. These impacts warrant the same level of assessment as impacts at the quarry itself.