

VOWW

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16 July 2023.

## **Objection**

Re: Stone Ridge Quarry Project – SSD-10432

Submission Objecting to the Proposal.

This submission is written on behalf of the members of VOWW and BHSAG (Brandy Hill/Seaham Action Group). Members from both groups have been involved with several quarry expansion applications including Hanson Brandy Hill and Daracon Martins Creek. It is disappointing and surprising that, even though the DPIE is fully aware of our past involvement, this was not made known to ARDG as no contact has been made with our organisations to obtain comment as required by SEARS.

*In particular you must:*

- *consult with:*
  - *affected landowners.*
  - *community groups.*

Our focus in this submission is **transport** and **social amenity**.

We would also like to bring to your attention the difficulties residents have had in accessing the DPIE website to lodge submissions. VOWW has received several requests for help with this and even with detailed instructions the problems still exist. We therefore believe that some submissions have not been made due to these difficulties.

### **Transport.**

**The transport of quarry material from the Stone Ridge quarry as well as the cumulative effect of the other quarries is an issue that affects local residents as well as road users in a much wider area than just the intersection of Italia Road and the Pacific Highway.**

**Both issues need to be properly assessed.**

*, TfNSW has accepted in-principle a proposal by the three parties to improve road safety at the existing Italia Road and Pacific Highway intersection via construction of a dedicated left-turn northbound acceleration lane onto the Pacific Highway, which will remove the current left-turn merge movement with a safer downstream merge movement. (1.2 related development – introduction p.1)*

**This ‘in-principal’ acceptance is issued for the physical intersection of the Pacific Highway and Italia Road only with no mention of the consequences of the dangers of extra truck traffic on the other road users who will pass that location. This issue will be expanded upon further in our submission.**

*The latest 7-day count data at Twelve Mile Creek from 2018, shows southbound only traffic volumes of around 10,700 vehicles and at Taree, some 30,000 vehicles two-way per day in 2023. Over the last 7 years, the Pacific Highway traffic volumes have seen approximately 2-3% growth per annum based on historic traffic volume data published by TfNSW. (3.2 Road network p.6)*

**While it might be true that there is no traffic data for the area directly at the Italia Road site, we question the use of data from Taree. Closer monitors can be found at Tomago, south of Italia Road. The 2018 data would be well out of date.**

**ARDG has stated:**

*The Project is seeking to access a high quality, hard rock resource suitable for producing a wide range of quarry products for the Lower Hunter, Central Coast and northern Sydney construction materials markets. (1.1 Background and project overview p.1)*

**One would therefore expect that the majority of trucks will head south and would need to pass through the traffic cameras on the Pacific Highway. A search of the TfNSW traffic volume viewer has data from these cameras for 2021. It shows 50,133 vehicles going both north and south. To use the increase percentage that GHD applied, the vehicular numbers for 2023 would be approximately 55,000 with 24,690 travelling south. This is a considerable difference to the 10,700 at Twelve Mile Creek (2018) quoted in the GHD report.**

**All traffic reports concentrate on the Italia Road intersection the Tarean Road interchange and the Pacific highway up to Italia Road but not beyond.**

**What is the wider picture for the area and the impact on all road users and towns/localities within this wider area?**

**All quarry traffic is doubling its footprint with left turn north out of Italia Rd and then southbound turnaround. This equates to double the air pollution and noise in the environment and the physical presence of trucks in both directions.**

**Trucks are noisy but heavily laden trucks can be doubly so with engine braking a major problem for any residence within the highway precinct. This kind of noise carries for**

kilometres and is a regular experience for the residents of Brandy Hill and Nelsons Plains who experience the Hanson quarry subcontractors or customer's poorly maintained vehicles on their roads. This lived experience should not be ignored. Thus, the other residents who live along the highway, even though not in view from the highway, would also feel the impact of the extra truck noise.

Trucks, B-double or truck and dog configuration are intimidating to some motorists, especially in such large volumes. Merging trucks at 1/minute (from one quarry only with cumulative impact not yet addressed), can be dangerous with lane changes needing to be made.

**Modelling for the flow-on effect of truck numbers for the area beyond the Italia Road intersection.**

Nowhere in the EIS is the effect of truck numbers on the wider network addressed.

In February 2023 TfNSW announced that planning approval has been granted for the extension of the M1 from Weakley's Drive to Raymond Terrace. No start on construction has been made and the end date for completion not yet known. Therefore, the road congestion is expected to get worse as the Lower Hunter population continues to grow.

A summary of the road network and the localities that will be most affected by the increase in quarry haulage vehicles will give a fuller picture. The target market for the product is to the south of the quarry. Once the trucks have passed Italia Road on the way south, they will encounter:

- Trucks from the Hanson quarry at Brandy Hill which uses the Richardson Rd interchange to access the Pacific Highway.
- The roundabout at Heatherbrae. This services Adelaide Street which is the main access to Raymond Terrace, a major service centre and residential area of Port Stephens. At peak hour and at holiday times this roundabout can cause traffic to bank up over Windeyer Creek into Raymond Terrace. Peak hour now seems to be from about 3pm-5pm. It also services Masonite Road which is a major link to Williamtown and Salt Ash. It is also a hub of highway eateries and service stations with regular traffic from these venues entering and exiting the highway at the roundabout. At school holiday periods, long weekends and the shoulder periods this is a major pinch point and cannot be ignored in this assessment.
- The Tomago Rd intersection controlled by traffic lights. This intersection services the main road to Nelsons Bay as well as the industrial area including Tomago Aluminium smelter. Sand quarry trucks from Salt Ash and Anna Bay access the highway at this intersection.
- The Hexham Bridge over the Hunter River. The intersection with the New England Highway is another major traffic pinch point. Already some drivers who wish to avoid the inevitable delays on the section of the Pacific Highway between Heatherbrae and Hexham are using the minor roads such as Seaham Road and

**Raymond Terrace Road to access the M1 at Beresfield. This is causing great delays for residents along these roads. The New England Highway from Hexham to Beresfield is always congested and the accidents in the Beresfield/Tarro section occur frequently causing great delays to commuters. It is obvious that the Highway is already at saturation point, contrary to the GHD report. Extra truck traffic will only cause more 'chaos' and danger to road users.**

*SIDRA Intersection is a computer software program that was developed to design and analyse the performance of both signalised and unsignalised intersections. SIDRA Intersection is endorsed by the RTA Guide to Traffic Generating Developments and Austroads and is common use across all Australian jurisdictions for the purpose of intersection modelling. (5.4.4 SIDRA parameters p.19)*

**Modelling for each of these pinch points on the highway should be done to see if the extra truck traffic from the quarry, indeed the cumulative truck numbers, to which this quarry will contribute, is as insignificant as the proponent suggests. The traffic report needs to acknowledge that the Italia Road intersection is part of the wider road network that will be impacted. Far reaching effects cannot be ignored.**

**Traffic volumes.....** *for purposes of a more conservative assessment, the Tuesday volumes will be adopted as the existing conditions. (Italia Rd intersection) (3.4.2 Italia Rd/Pacific highway p.10)*

**We question the use of conservative numbers. The issue of truck volumes needs to be addressed at peak traffic times as well. Choosing Tuesday, probably the quietest day of the week to use in assessments does not give a true picture.**

*Based on the transportation of materials using truck and dog combinations, which have a typical capacity of around 30 tonnes, there would be an average of 167 laden truck movements per day generated by the quarry. Noting the above, it is conservatively assumed that on any given workday 167 truck movements would be generated to and from the site, equivalent to a total of 334 heavy vehicle movements. These heavy vehicle movements would generally be spread across the day. (5.1 traffic generation – heavy vehicles p.14)*

**Note: to fulfill contracts quarries often need to dispatch product as early as possible to reach the intended market. As ARDG has stated, trucks will be loaded during the evening operating hours and would therefore leave at 6am. Most trucks travelling to the Sydney/Central Coast market would leave during the morning peak hour for most commuters with possibly lesser movements throughout the day.**

### **Cumulative Effect/Impact.**

*The Environmental Impact Statement (EIS) for the development must comply with the requirements in Clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000. In particular, the EIS must include:*

*...the likely interactions between the development and any existing, approved or proposed development in the vicinity of the site.*

**There has been very little attention placed on this very valid requirement. No mention has been made of the possibility of “Kings Hill” a new development between Raymond Terrace and Italia Road which is currently before the Land and Environment Court and where potential residents may feel the impact of noise and vibration as well as dust.**

*.... current traffic counts for the Pacific Highway and Italia Road*

*.... - a detailed assessment of potential traffic impacts on the capacity, condition, safety and efficiency of the local and State road network (as identified above)*

*.... an assessment of cumulative traffic impacts, having regard to any other approved, operating or proposed developments in the locality; and - a description of the measures that would be implemented to mitigate any impacts.*

**We would like to see revised, current traffic counts for peak traffic, for example on a Friday as well as during the peak holiday times if the quarry intends to work on those days. We understand that there will be no work during the Christmas and Easter holidays. However, even the lead up days to these holidays will have an impact on traffic numbers.**

**The cumulative effects of the existing and anticipated quarries must be quantified and included. This EIS refers to the Seaham Boral quarry as a quarry with a limited life.**

*.... however, based on the existing material reserves and extraction rates it is not expected to continue operation for long past 2026 without further approval.*

**More investigation would reveal that Boral is applying to Port Stephens Council, the current consent authority, for an increase to the depth of the quarry pit to be able to extract more product. Ultimately, they will seek an expansion to 2 million tonnes/annum over a 30-year life. This information is readily available.**

*The proposed Seaham Quarry Project (the Project) involves continuing operations at Boral's existing Seaham Quarry (the Quarry) for an additional 30 years, until 2057. The Quarry located at 139 Italia Road in Balickera NSW, has a development consent to operate until 2035. The Project is being investigated because the approved hard rock reserves will be exhausted by approximately mid-2037. (2027?) Boral quarry factsheet – May 2023.*

The total number of quarries either already operating, or in the process of seeking approval, is staggering.

The figures are as follows and send a clear message as to the saturation of the Pacific Highway with quarry haulage vehicles now and into the future.

Karuah South Quarry.....600,000tpa .....134 trucks/day

Karuah East/ Hunter Quarries....1.5mtpa..... 334 trucks/day

Seaham Boral. Proposal for..... 2mtpa .....450 trucks/day

Eagleton Quarry. Proposed.....600,000tpa.....134 trucks/day

Brandy Hill. Approved to expand..1.5mtpa.....334 trucks/day

Hillview Booral. Proposed.....1.5mtpa.....334 trucks/day.

Deep Creek, Limeburner's Crk.....500,000tpa.....111 trucks/day

(Decision pending)

Stone Ridge. Proposed.....1.5mtpa.....334 trucks/day.

Martins Creek...refused by IPC but further proposal possible.

Total=over 9 million tonnes/annum.

Total average trucks/day = 2,615. This is a rough estimate for average production. At peak production this number would be considerably larger depending on the variables at each quarry. In fact, close to 5,000 trucks/day.

With the figures of truck numbers above in mind we believe the statement... *the modelling suggested that under all three scenarios the interchange would operate at a satisfactory level. Noting the proposal is only expected to generate 30 outbound heavy vehicle movements per hour, the future conditions are expected to perform better than the modelled future scenarios ....* **needs to be reviewed with cumulative effect factored in.**

*Given that the Project, as well as the Boral Seaham Quarry and the Eagleton Quarry, would generate only low impact traffic movements by heavy vehicles at the intersection of Pacific Highway and Italia Road (left-in and left- out), and that the Tarean Road traffic modelling (Appendix B) demonstrates adequate performance with up to 100 additional articulated trucks using this interchange, the road network can **comfortably accommodate** the Project operating in conjunction with other quarries in the area.*

**Can this interchange still be considered safe and able to handle the extra truck numbers stated above?**

**Has anyone looked at the diesel emissions of this number of trucks to the environment around the Tarean Road interchange?**

**The cumulative effect of this issue has not been addressed and is of huge importance to the health of all residents in that area, indeed to the road users along the highway.**

*The cumulative impacts of the Project and surrounding quarry developments have been assessed and can be accommodated by the road network.*

**We have found no modelling to substantiate this. No extra truck numbers have been mentioned or the impact on other road users other than to make a sweeping statement that the road network will be able to cope with the extra traffic generated by Stone Ridge.**

*.... under a third scenario where 20% growth was applied to the existing volumes and an additional 100 articulated trucks undertook a U-turn. The modelling suggested that under all three scenarios the interchange would operate at a satisfactory level. Noting the proposal is only expected to generate 30 outbound heavy vehicle movements per hour, the future conditions are expected to perform better than the modelled future scenarios (5.4.1 Modelled Scenarios – p.17)*

**The 30 outbound heavy vehicle movements equate to one quarry only and we can only assume that the reference to 100 truck movements refers to other quarry traffic.**

**In the section *Background Traffic Growth*, no mention of the other quarries. It is only in 5.6 that the other 2 nearby quarries are mentioned by name.**

*It is the heavy vehicle movements which are expected to have a more notable impact on the external road network. For this reason, the following sections focus on the heavy vehicle movements generated by each of the three quarries.*

*The Boral Seaham Quarry is currently in operation and therefore, any traffic movements generated by the use would have been included in the existing conditions traffic surveys conducted for this report.*

**Perhaps the numbers are included but buried somewhere in tables with no mention of the actual quarry.**

*In 2011, Boral was granted a permit to increase the life of its quarry, however based on the existing material reserves and extraction rates it is not expected to continue operation for long past 2026 without further approval.*

**We have already shown that it is public knowledge, via the Boral Project update quoted earlier in this submission, that the Boral quarry will be seeking to expand its operations in the near future to 2 million tonnes/annum. All aspects of this potential expansion must be considered under the ‘cumulative effect’ requirement as set down in SEARs.**

*Eagleton Quarry The Traffic Impact Assessment (TIA) for the Eagleton Quarry, prepared by GHD in 2016, projected a total of 192 daily trips, including 170 heavy vehicle trips.*



Summary of cumulative impacts. Given that the Project, as well as the Boral Seaham Quarry and the Eagleton Quarry, would generate only **low impact traffic movements by heavy vehicles at the intersection of Pacific Highway and Italia Road** (left-in and left out), and that the Tarean Road traffic modelling (Appendix B) demonstrates adequate performance with up to 100 additional articulated trucks using this interchange, **the road network can comfortably accommodate the Project operating in conjunction with other quarries in the area.**

This summary is not accurate in the description of the impact on the intersection mentioned. If you were to take Brandy Hill quarry as an example that perhaps all other quarries would have to abide by then haulage would only be allowed between the hours of 6am to 6pm. If you add the number of trucks per hour from each quarry (30+15+45=90) you would have 1 truck every 40 seconds entering the highway. At peak production that would increase to 1 truck every 20 seconds. Hardly a low impact on the Italia Road intersection. All truck drivers do not accelerate and decelerate at the same rate and therefore it is inevitable that trucks would soon be tailgating and be intimidatory to other road users.

Members of our organisation who regularly use Italia Road for access to the Pacific Highway are appalled at the suggestion that these numbers of trucks would be of low impact. We would be caught up in this melee of trucks accessing Italia Road from both sides and then stuck between them at the intersection.

Once these trucks meet with the trucks from the Bucketts Way intersection and then the Karuah quarries the general public will definitely notice the difference in the cumulative impact of the quarry traffic.

- Has any consideration been given to the numbers of heavy vehicles that will be accessing the quarries to deliver the required materials for the concrete batching plants that are proposed? This must be factored into the truck numbers as well.
- Has any consideration been given to the trucks/quarry traffic (empty) that comes from the north and needs to cross over the oncoming traffic to enter Italia Road?



## Social impact

**The social impact on the local residents as well as the wider community needs to be given equal weight to all other considerations when decisions on the potential quarry are made.**

The SEARS Assessment Requirements states:

*.....paying particular consideration to: - how the development might affect people's way of life, community, access to and use of infrastructure, services and facilities, culture, health and wellbeing, surroundings, personal and property rights, decision-making systems, and fears and aspirations; (SEARS p. 4)*

**We believe the S.I.A. was flawed from the beginning and as such the authors should have had another strategy they could have used:**

*It is important to note that while only **four** complete responses were received to the community survey provided during the SIA engagement phase, there were twenty attendees at the community information session held.*

We find it unbelievable that such a small community response did not raise concerns with Umwelt and that the data collected from such a small cohort was still used to provide the SIA.

*In particular you **must**:*

- *consult with: – affected landowners; – community groups.*

**And:**

*.... demonstrate that **effective consultation** has occurred.*

• *describe the issues raised by public authorities, service providers, **community groups** and landowners. (SEARS p.5)*

**These are issues in the SEARS that have not been addressed effectively. The community group VOWW (Voice of Wallalong and Woodville) which represents residents in a wide area of the West Ward of Port Stephens was not approached for a response. It is the wider community that will be impacted by issues such as:**

- **Excessive truck movements at the Italia Rd intersection and along the length of the Pacific highway.**
- **Loss of a public State Forest for recreation.**
- **Loss of important wildlife habitat, something that is regarded highly by the rural community.**
- **Increasingly, concern about the issue of intergenerational equity where the proponent sets the bar higher for the economic benefits rather than the environmental changes that will deny future generations the benefit of a landscape that would still have value long after the quarry has gone.**

**The DPIE Social Impact Assessment Guidelines Feb 2023 indicate specific requirements that must be met and how they can best be obtained.**

*Respectful, inclusive and meaningful engagement is a fundamental part of SIA, alongside other research activities. It provides first-hand insights into what people value and how they expect a project to affect them.*

*Provide **multiple** opportunities for people to participate.*

**With such a small response from the community canvassed it is obvious that the multiple opportunities did not exist.**

*Engagement and public participation are not a substitute for **good evidence-based SIA**; (p. 28)*

**In our opinion these 3 points have not been adequately addressed. For example, had the proponent/Umwelt contacted VOWW or any members of BHSAG (Brandy Hill /Seaham Action Group) and asked for opinions based on the evidence of their experiences with the Brandy Hill Quarry expansion, they would have had a much better, evidence-based report to deliver. Community quarry issues are issues for any quarry and this case could have been used as a good example of issues that would be experienced by the Italia Rd/Seaham community.**

**In theory the aim of the community engagement's objectives seems reasonable. However, the reality is people still feel their concerns are being diminished and not taken on face value. It is treated as if it is an abstract concept, but people's realities are concrete for example the 92-year-old resident living on Italia Rd reports her house shakes every time a blast is set off at Boral Quarry. This would be compounded by the blasts from ARDG no matter how deep the pit is because vibrations have no boundaries.**

*Engage with a broad cross-section of people in a manner consistent with the SIA principles ....., include people from all parts of the community, from grassroots to leadership levels, and from informal, community-based organisations.*

**It is obvious from these guidelines that the type of consultation that Umwelt used did not include community-based organisations.**

**VOWW was not approached.**

**BHSAG was not approached.**

**EcoNetwork PS was not approached.**

**KKEPS was not approached.**

**These are the major community-based organisations that have wide reaching affiliates with a wealth of information on the environment and quarrying yet no one thought to reach out for consultation or opinions.**

*From DPIE Guidelines Appendix C Review Questions*

*Does the SIA report identify and describe all the built or natural features that have value or importance for people, and explain why people value those features?*

**This was done in such a cursory way and seemingly not important to the writer of this report. Especially when such a small demographic was consulted. This is a state Forest and thus a recreation area for a wide section of the community.**

**Certainly, little mention of the importance to the wider community of the ecological value of the area. The PS council koala and biodiversity reports, for example, are no longer valid as research was conducted in 2003. Vegetation has grown and wildlife is abundant and valued by residents.**

*Were the extent and nature of engagement activities appropriate and sufficient to canvass all relevant views, including those of vulnerable or marginalised groups*

**Our submission has already shown that this has not been achieved.**

*Do the evaluations of significance of social impacts impartially represent how people in each identified social group can expect to experience the project, including any **cumulative effects**.*

**Cumulative effects have not been adequately addressed as shown in our traffic assessment submission. Nor have the cumulative effects of noise and poor air quality been seriously considered.**

**It has been shown through the community networks that the proposed location of the quarry within Wallaroo State Forest has significance on an environmental basis and based on public access for recreation, mountain bike riders, cyclists, walking groups bird watchers etc.**

**This forest is a valuable asset to this, and the wider, community of Port Stephens. The peace and tranquillity it affords is what the character and ambience of the area is all about.**

*Does the SIA report adequately describe likely social impacts from the perspectives of how people may experience them, and explain the research used to identify them? When undertaken as a part of SIA scoping and initial assessment, has the plan for the SIA report been detailed?*

**The SIA does not adequately describe the likely social impacts because the target area for the SIA was so small. The authors were disappointed with the number of responses they were given, we believe due to poor engagement and inadequate information sharing but continued with the assessment rather than use new tools to engage with community. In our opinion, a flawed process.**

**People had already become quite disillusioned with the process and become disengaged. The authors believed because there were so few responses to surveys that the community at large is quite happy with the information they were given and the project to proceed.**

*The community-identified strategy or opportunity. (p.66 SIA)*

- **Was the community made aware of the structure of a V.P.A. and the kinds of things that a company may provide as a service?**

- **What was the feedback to the community members who may have suggested “lollipop people” for example to show that these were not strategies that will be able to be adopted on a major road such as Italia Rd. By suggesting to people that the quarry may act as a cash cow and that their suggestions may be acted upon is disingenuous and misleading.**

**This process has belittled the major effects that need to be addressed.**

**Through the example of other VPAs such as Brandy Hill quarry where residents have been able to negotiate a realistic issue; a path along Brandy Hill Drive to address safety issues for residents with 300 – 600 trucks a day on the road, residents of Italia Rd would have had a better understanding of what was expected of them when confronted with this question.**

**The most realistic suggestion for a VPA. was the erection of bus stops with shelters at school pick up points.**

### **Community Engagement.**

**The SIA is flawed because of the small number of people who were included or canvassed.**

**SIA has not thoroughly assessed character and amenity, in fact very little has been written on this issue other than to say that people have some concerns. These concerns have not been alleviated in any way.**

*It is important to note that while only four complete responses were received to the community survey provided during the SIA engagement phase, there were twenty attendees at the community information session held during that time. (p.36)*

**Several members of VOWW attended the information session at Seaham Hall. They were not able to recall any mention of the surveys that were being conducted. They may have been available on a table somewhere in the hall but not emphasised to the residents present.**

**The responses of those residents who were canvassed, has shown the desire to maintain the local ENVIRONMENT. (p.26 SIA) – Community Values and Aspirations.**

- *Close to everything. It's still close to services, it's ten minutes to the shops, ten minutes to the school, thirty minutes to the beach.*
- *We will never have neighbours.*
- *We liked that we would never have the possibility of being built out.*
- *I like it here for the forestry.*
- *Been here 26 years and enjoy horse riding, motorbike riding, 4WDing, camping, exploring the State Forest. We have peace and quiet all the time.*
- *Lack of noise. No neighbours.*
- *Quiet, rural atmosphere.*
- *I have a strong interest in nature, local vegetation, flora and fauna. It is a hobby, and I can indulge it quite easily here. We love living here.*
- *Bird watching, nature.*

*Assessment Limitations It is important to note a potential limitation of this SIA is that a limited number of stakeholders chose to be involved in consultation activities during the second round of consultation (SIA / EIS phase) and complete an interview or survey. It is possible that this is due to a lack of notable concern with regards to the Project proposal. (p.19 SIA)*

**This again shows there was no flexibility of the implementation of or the information gathering for this S.I.A. The authors should have had been aware that there was a problem and had a plan B. Residents are genuinely concerned, the wider community is genuinely concerned, the community groups are concerned, environmental groups are concerned yet none of these were consulted. It is certainly NOT showing an acceptance of the quarry.**

**Some people think; ‘why fill out a survey when no one will listen anyway’.**

**Others will dig in their heels and fight. Hours are spent researching and trying to make a coherent argument. Yet, the report relies on there being no concern because no one filled in a survey!**

**As mentioned before, perhaps the methodology was flawed.**

**The truth is there is anger that State Forest is implicated.**

**Anger and disbelief that contrary to State and Federal Government policies on protection of wildlife and habitat, on greenhouse gas emissions and climate change, this proposal has any traction at all.**

### **Lived Experience.**

**Here are some issues that arose in the SIA for the expansion of the Brandy Hill Quarry that may shed some light into the way the residents closest to the proposed Stone Ridge quarry site may feel or be affected.**

**Reports showed the community had varying levels of:**

- **Anxiety and depression.**
- **Sleep deprivation**
- **Anger at the loss of control over their own health and wellbeing.**
- **Fear for the health of children who already suffer from asthma – extra dust exacerbates this condition to the point of being chronic with days absent from school.**
- **Fear of tank water contamination – often collected from the roofs of buildings coated in quarry dust.**
- **One mental health breakdown due to the effect of blasting on her house and her health.**
- **Anger at noise of crushers and loading trucks well into the night.**
- **Anger at the frequency and the noise of trucks on substandard roads.**
- **Anger at the broken windscreens from loose gravel deposited on the road.**

**If you take these examples into consideration the outcome could be that the rural community at Balickera can no longer be considered a healthy, cohesive community. Lives will be shattered, and relationships become fraught.**

**How do you mitigate this? And the cumulative effect of the other quarries has not yet been addressed.**

**These are serious social impacts that are not being addressed at all.**

### **Natural Capital.**

*The State Forest is used by visitors for a number of recreational activities such as bushwalking, camping, picnicking, and recreational activities such as dirt bike riding and fourwheel driving. William Hind Picnic Area located within the State Forest has picnic tables, toilets, BBQ facilities and parking. (p.28 SIA Table 3.3)*

*The Wallaroo National Park is located adjacent to the Project Area*

**It is part of the long-term vision that Port Stephens LGA has for its nature-based vision and recreation for West Ward. We acknowledge that Port Stephens has several sand and hard rock quarries within the LGA. However, every single one has a negative effect on Port Stephens LGA as a whole. Residents surrounding each of these quarries object to their very existence and the sustainability long term is questionable. The cumulative effect of multiple quarry trucks, sand and rock, is having a negative effect on the area. To open a new quarry in this mix is unsustainable to the environment and to the human population.**

**To link this back to amenity and character of this area - the landscape will be destroyed, the biodiversity will be non-existent and the cost to the human environment is unimaginable.**

### **Road Safety and Cumulative Impacts (p.38 4.1.1)**

**The wider Seaham community should have been consulted regarding road safety and cumulative road impacts. It is certainly important for near neighbours but also for those regular uses in the surrounding localities. The traffic report has addressed the impacts from Italia Rd intersection to Karuah but no mention of social impact for residents or businesses from Italia Rd to the New England Highway.**

**Had residents been able to contribute, Umwelt may have become aware that Italia Road, at times of flooding, is the only way to reach the Pacific highway for many residents of surrounding localities. For example, in 1990 all roads out of the Brandy Hill/Seaham area and beyond were blocked by flood water and every resident needed to use Italia Road and the highway to be able to get to Maitland, Newcastle and beyond. There were other floods when this road was the only way in and out of the area and thus the dangers of the mix of trucks of this magnitude, and cumulative, with already anxious drivers makes for a very unsafe environment.**

### **Loss of amenity due to Noise (4.1.2.1.)**

#### **Noise from project Construction and operation. (p.42)**

*During consultation some near neighbours also raised concern regarding operational noise with one consulted landholder recalling that they have already heard drilling activities during the exploration stage of the development. One landholder also noted that at times the machinery from a neighbouring quarry could be heard. It was also noted that neighbouring quarry operations could be heard until 10.00 pm and there were therefore concerns that the Project may operate in a similar manner.*



The residents who have already noted noise impacts from other quarries should be listened to. While ARDG may not be intending to work the quarry past 6pm the trucks will still be loaded until 10pm. Loading of trucks is by no means quiet and in a still night environment in a rural locality this noise will travel. The other noise impact revolves around truck/road noise. The use of subcontractors whose trucks might not necessarily meet the standards the local community might expect, often have squealing brakes and loud engine noise. The modifications that some truck owners make will have an impact on the day-to-day activities of residents.

*The NIA has concluded that given the **existing** traffic volumes on the Pacific Highway, Project-related traffic noise impacts at receivers along this road are **anticipated** to be negligible. As the operational road traffic noise levels are **predicted** to comply with the Road Noise Policy (RNP) criteria*

The above statement relies heavily on current, anticipated and predictions. The cumulative impact of truck numbers already mentioned previously in this submission regarding traffic concerns, shows that the truck numbers in the vicinity of Italia Road and merging into the Pacific Highway will be unprecedented. The fully laden trucks turning left will have heightened engine noise as they accelerate and merge. Those empty trucks turning left into Italia Road from the south will have brake noise – either squealing or engine braking – depending on the contractor and standard of truck maintenance.

(Again, lived experience from residents along Brandy Hill Drive and Seaham Road).

*NIA results show there will be no exceedances of the cumulative noise criteria.*

We question the accuracy of this report. How many quarry trucks/truck and dog/B-doubles was this based on. Please refer to peak movements from 3 quarries when you make these predictions and include the fact that the trucks will be travelling along the stretch of highway between Karuah and Italia Road twice.

Cumulative noise criteria for the area leading to and around the Heatherbrae round-about has not been modelled or predicted. There are residents near the Richardson Road interchange who will certainly notice the increase in truck traffic noise at the cumulative stage.

In addition, you are talking about a rural area around Italia Road with rural noise and not a highly industrialised site with expected background noise.

*The use of engine compression brakes should be limited.*

Again, with reference to lived experience, this is not an easy fix. Residents along Brandy hill Drive report infringements to the ‘Hanson code of conduct for haulage truck contractors’ on a regular basis. Management is well aware of the problems and has made every effort to address the problem over a number of years. There are 6 large signs reminding drivers to abide to the rule and respect the local community however, with different standards of maintenance and the ignorance of some drivers, the problem still exists.



From the report it is our understanding that the quarry will rely on 2 on-site diesel generators until 2025.

- Has the noise generated by these generators been considered especially on still evenings? There is the potential for there to be a continuous hum which might become quite irritating.
- Has the diesel particulates from these generators been factored into the pollution from the site?

#### **Dust (4.1.2.2)**

##### *4.1.2.2 Loss of Amenity due to changes to Air Quality*

*Cumulative dust exposure was raised as a concern by near neighbours in regard to existing and proposed quarry development in the area. A proximal neighbour recounted their previous experience of living near coal mines in the Hunter Valley region and held concerns that further quarry developments would create cumulative impacts for landholders, including air and water quality concerns - health and wellbeing concerns associated with dust.*

- *We cop a lot of dust as it is, and we are on tank water.*
- *We already have one quarry, and another is proposed also...*
- *Have you been here on a still day? The air doesn't move, it [the dust] will come in and just sit.*

**We urge you to listen carefully to the concerns the residents have.**

**The problems encountered from other quarries in the area include, but not limited to:**

- **Regular complaints regarding dust settling on roofs with run-off into rainwater tanks used for household consumption.**
- **Dust induced illness such as nose bleeds, asthma and dust hanging in the air above the tree line of the surrounding area on calm days.**
- **Diesel particulates settling on furniture in houses (when windows left open for ventilation) along haulage routes.**

**Residents in the Italia Road area have reported issues with animals experiencing dust induced health issues.**

**While dust monitors are set to record particulates according to the minimum standards that are set by State Government agencies, residents close to the Brandy Hill quarry still dispute their accuracy and whether minimum standards are enough.**

**On particularly windy days the dust issues are much further spread with accumulations never considered.**

#### **Property Access**

**The cumulative impacts of trucks from three quarries with entry to quarries directly opposite each other has not been taken into consideration. Residents have voiced their concern, but the answer given is quite inadequate from a realistic point of view as the public that use this road will be caught up with trucks from 3 quarries, cumulative. In fact, the proponent has only mentioned the upgrade to the highway intersection.**

*ARDG, Boral and Eagleton have resolved with TfNSW to submit a separate Development Application to address the exiting safety and access issues associated with the Italia*

*Road/Pacific Highway intersection. The intersection upgrade is proposed to address safety concerns and support the increased volume of traffic through reducing waiting times queuing at the intersection.*

**Residents are expressing concern about the intersection of the quarry access roads and Italia Road.**

*.... near neighbours voiced concerns that the level of traffic currently experienced impedes **their property access** and that any further increase to traffic would exacerbate this issue. Trucks bank up in my driveway Where will it [the proposed road for an intersection change] start to make an extra lane? I'm concerned about safety, my kid's safety, trying to get out of my driveway.*

**This issue needs to be addressed. Full and empty trucks will be accessing Italia Road from both directions. Even with a dedicated turning lane for empty trucks accessing the Stone Ridge quarry there will be delays as fully laden trucks will be exiting the entrance opposite at several trucks/minute.**

#### **4.3 Health and Wellbeing**

*Health and wellbeing impacts include impacts to both physical and mental health and may include psychological stress resulting from uncertainty, financial and/or other pressures, as well as anticipated changes to individual and public health.*

##### **1. Physical.**

**We would refer you to the health and wellbeing concerns that were recorded for the Brandy Hill Quarry as they are not perceived but actual. Rainwater tanks do contain dust as the rain flushes the dust from the roof into the tanks. The dust is dispersed and affects people, in particular children and those who experience asthma and other respiratory illnesses.**

**This includes one family with 3 children who have only been diagnosed with respiratory problems since moving to the area within 2 kilometres from the quarry.**

*During engagement activities concern was noted regarding the potential contamination of drinking water (7). The majority of concerns centred around dust being deposited in rainwater tanks and affecting water quality, as all consulted landholders rely on rainwater tanks for their water supply. One landholder also raised a concern the health of their livestock may also be affected by water quality.*

This concern has not been addressed other than to say that:

*Consideration of meteorological conditions in planning the loading and unloading of overburden and product materials, **and that water carts will be deployed within the quarry site.***

**Does the answer above, regarding meteorological conditions mean that the quarry will cease operations during times of high wind?**

**The concern about problems with dust:**

*Dust produced from the Project resulting in impacts on tank water quality, thereby affecting drinking water quality and resulting in health and wellbeing impacts for proximal landholders (social impact evaluation p.62)*

**Was answered:**

*Provide community with information of the complaint procedure during operations (through OEMP).*

**Please explain how consultation throughout the process by providing information to the community of complaint procedures is effectively answering the high concern that residents have of the quality of their drinking water. There is no point in making a complaint once the dust occurrence has been noted.**

**2. Mental health/stress.**

**Mental health is difficult to quantify as every person will feel stress in different ways.**

**There is the stress of:**

- **The loss of the value of your house.**
- **Financial stress if your farm animals need constant veterinary attention and the potential loss of income.**
- **Stress brought on by loss of sleep.**
- **Stress at the loss of habitat for native animals and environmental changes. The spectre of climate change now looms large, and people are more concerned about the implications of loss of tree canopy etc.**
- **Anxiety when children need to access the road to access school buses or to drive to town.**
- **Anxiety with regard to the future for the children when habitat destruction seems to become the norm.**
- **The change in the character or ambience of the place you have come to value and love.**

**Nowhere in the EIS is there mention of the term ‘solastalgia’.**

**This is a great contributor to the feeling of distress at having no control of our physical environment, just as is being experienced by the residents most closely affected at Balickera/Italia Road.**

“It is best described as the lived experience of negatively perceived environmental change. A distinction can be made between solastalgia linked to distress about what is in the process of negatively perceived change and [eco-anxiety](#) linked to what may happen in the future...

The word was coined by philosopher [Glenn Albrecht](#) in his 2005 article *Solastalgia: a new concept in human health and identity*.<sup>[1]</sup> He describes it as "the homesickness you have when you are still at home" and your home environment is changing in ways you find distressing. In many cases this is in reference to global [climate change](#), but more localized events such as....destructive [mining](#) techniques can cause solastalgia as well.<sup>[2]</sup> ...., solastalgia refers to the distress specifically caused by environmental change while still in a home environment.<sup>[3]</sup> In 2015, an article in

the medical journal [\*The Lancet\*](#) included solastalgia as a contributing concept to the [impact of climate change on human health](#) and well-being.”<sup>14</sup>

(Wikipedia)

“A community's loss of certainty in a once-predictable environment is common among groups that express solastalgia.”<sup>1</sup>

Albrecht, G. (2005). *Solastalgia: a new concept in human health and identity*.

**This was discussed at length with Glen Albrecht when the Brandy Hill community was struggling with their feelings with the expansion of the quarry at Brandy Hill. This is an issue that is increasingly being felt by residents around quarry sites and should be included in all EIS reports.**

#### **4.4.2 Economic benefits**

*The estimate of NSW net production benefits of the project includes **the costs of water access licences, biodiversity offsets, road intersection upgrades, road pavement maintenance costs and costs of mitigation, monitoring and management of other potential impacts.***

*Consequently, the Economic Assessment estimates that the Project will have a net economic benefit to NSW, and hence is desirable and justified from an economic efficiency perspective.*

**The highlighted benefits in the above statement all relate to the ability of ARDG to be able to establish the quarry from which they will make a huge profit over the life of the quarry. Should the State Government really be earning an income from the establishment of a private quarry with a future huge profit at the expense of the local residents who are taxpayers?? And at the expense of the local environment that it (the Government) is trying to protect with all the legislation it can muster?**

**People in localities that live near quarries are constantly reminded by statements such as this they must sacrifice their health and well-being, character of their area, the environment has to suffer all for the “common good”.**

**Why would residents not be upset that profitability of a company comes before their needs, their lifestyle, their health? There is a feeling of helplessness when gravel for a road or concrete for a house slab is more important than people and the environment they live in.**

*These jobs are estimated to provide local benefits through increased disposable income (\$0.7M per annum)*

**Has Umwelt made any attempt at quantifying:**

- **the potential loss of income to any neighbouring farms that may lose income from another quarry nearby.**
- **the cost of repairing a house due to damage from blasting**
- **the need for a resident to install new double glazing to their windows to eliminate some of the noise impact.**
- **the extra visits to the doctors to treat respiratory problems.**

**The term ‘local benefits’ would indicate to most people ‘in their immediate area’ and we doubt that is the case here.**

*The Project is estimated to provide the following annual direct and indirect annual effects to the local economy:*

- \$102M in output
- \$58M in value-added
- \$14M in gross wages
- 176 jobs (47 direct, 129 indirect).

**How were these figures arrived at? This needs further explanation. (At a Hanson quarry CCC meeting when queried about the figure given for the benefits to the community the answer was that petrol was bought along the haulage route. It was an unacceptable answer to a reasonable question about the benefits to the local community.)**

**Social Impact Evaluation (Table 5.1)**

**We believe that this evaluation is flawed as explained in several sections of this submissions.**

**However, even with such low numbers, the results are obvious.**

**The evaluation shows in the positive / negative SIA rating there are 22 negative results with 5 positive results.**

**Of the negatives:**

**2 rated extremely high in perceived significance.**

- road safety
- habitat loss

**7 high**

- road safety
- road deterioration
- Social amenity – heavy vehicles  
dust  
noise  
trust in offset system  
quality of tank water

**5 medium**

**8 low.**

**With the 3 positive ratings, 1 medium and 2 low.**

**This summary alone shows that the community surveyed were not happy with this quarry going ahead.**

**As an example, perceived community concern for potential habitat loss is very high. Mitigation measure or enhancement is not accepted by the community as proper acknowledgement of the problem of removing large areas of vegetation and certainly not an ‘enhancement’ of the environment.**

### **Intergenerational Equity.**

#### **The EP&A regulation defines the principal as:**

*...that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.'*

*Intergenerational equity refers to equality between generations. It requires that the needs and requirements of today's generations do not compromise the needs and requirements of future generations in terms of health, biodiversity and productivity.*

**ARDG believes that:** *The Project has relatively few environmental and social impacts to the present generation due to the proposed mitigation, offset and compensation provided.*

**Considering that the residents consider the environmental concerns high on their priorities with little faith in the offset system it will be hard to convince them that this is in the best interests to the futures of their children or grandchildren.**

*The benefits provided by the Project relate to both the use of the products from the quarry (many of which will be used for the construction of infrastructure or other developments that will service both the current and future generations) .... In particular, the Project will:*

- *Provide construction material that will support the construction and maintenance of roads and commercial development that will provide benefits to many future generations.*

**These arguments have been used time and time again in justification for quarrying to enhance the lifestyles for future generations. Researchers need to look more closely at the worldwide demands made by the younger generation. They care for the environment much more than past generations, understand the implications of climate change more acutely than the present generation and are demanding changes be made in the use of renewables to enhance our lives. Already there are global companies who are listening with changes to the way roads are constructed and the materials they use.**

A report from RENEW, "Sustainable Infrastructure and the Importance of Future Proofing", written by Rob McCann, Sustainability Manager – Infrastructure Projects, highlights some important issues that apply to 'intergenerational equity'.

- Our infrastructure needs clever planning and engineering which meets the needs of the present, without compromising the needs of the future.
- We need to make sure infrastructure serves our needs, maintains biodiversity, is climate resilient and future proof. The answer is, of course, sustainable infrastructure.
- Raw materials aren't endless.
- There are now global shortages of materials you would never expect.

### **Conclusion.**

We believe there is a conflict of interest with this project being situated in a State Forest. The government stands to profit through royalties and fees to be paid yet is also the arbiter of the process and decision. The profits to the Government have been mentioned in the EIS as a



positive for the project yet no mention of the financial liability to the community or the long term costs of the environmental damage.

The EIS written by Umwelt on behalf of the proponent has not addressed many issues fully and relied on a small cohort of the community to make final judgements on the suitability of this project.

No community groups were consulted as required by SEARS, communities that have a wealth of experience with environmental and quarrying issues that are vital to this proposal. The survey referred to by Umwelt was not widely available and certainly not brought to the attention of the public.

There are concerns within the community that situating such a large quarry within State Forestry land will set a precedent for other Forestry land. This is public land that has been set aside for recreation and selective logging with replanting. It was never envisaged by the public to also allow digging out rock without the possibility of ever revegetating. This area of Port Stephens will be left with one void at Brandy Hill and three at Balickera. Cumulatively should be included the final voids at each of the Karuah, Deep Creek and Booral (should they be approved) sites. How can this be in the public interest now and into the future?

The pressure on remaining natural forests and wildlife habitat is increasing with housing estates, industrial areas and quarries destroying habitat with no end in sight. This is a cumulative problem that DPIE needs to factor into its final decision.

The public is notably concerned of the potential of this proposal setting a precedent for other operators to apply for quarry licences adjacent to the Stone Ridge site or for ARDG to request an expansion since they have mapped the appropriate geology leading north to Karuah.

The residents of Brandy Hill were led to believe that the quarry at Brandy Hill had a 30-year operating licence and that after that life without trucks and noise and dust would become the norm. However, an expansion was sought for another 30 years and was granted with conditions.

The same is being experienced by the residents of Balickera with respect to the Boral quarry. Not only does that community have the potential of a new ARDG quarry but and expansion plan by Boral for 2 million tonnes and an application being assessed by the Eagleton quarry as well.

**That cumulative effect is not treated fully in any sections of the EIS. It is as if the other quarries don't exist and as it is of no concern. However, it is a major concern for the residents in every single category of the EIS.**

**On balance, this proposal is not in the public interest and should not be allowed to proceed.**



Margarete Ritchie  
On behalf of VOWW.