

Introduction

Other residents and organisations will have addressed the many significant environmental and social impacts that should be sufficient to have the DPE to reject this proposal. But, given that the DPE fully supported the Martins Creek quarry proposal despite the overwhelming negative social and environmental impacts, I assume the DPE will recommend approval of this one too. So, this submission focuses on the conditions that DPE should attach, if it determines that this proposal be approved.

The cumulative impact of this development, along with the two other Italia Road quarry proposals in progress, plus other proposals toward Boral and Karuah, plus ongoing sand mining operations on the nearby coast, and the likely future addition of more quarrying proposals to utilise the common underlying geological formations, is the main issue. The cumulative impact of this proposal and potentially multiple other quarries in the area, over the next 30 years and beyond (100 years or more), on the natural environment, social welfare, health and safety of residents and road users, road traffic congestion etc, will have vast negative impacts on intergenerational equity, unless the DPE assesses this as an emerging mega extractive industry centre and applies appropriate conditions.

This proposal, if approved despite the significant ecological and social impacts, must be treated as the forerunner of this area becoming a major quarrying centre for not just the next 30 years, but for generations to come. Just like the Brandy Hill quarry, when the initial consent expires, significant quarriable resources will remain, and subsequent proposals will be submitted to expand the footprint and extend the life of the quarry(s) in further 30-year increments. If this area is destined to become a quarrying mega centre, then it is unacceptable for all output to be transported by road, with much of it being hauled long distances to Sydney.

Just as the Hunter Valley coal industry had to change from road to rail haulage for safety and economy, the quarry industry must also use rail for long distance haulage, in the interest of intergenerational equity.

Whatever conditions the DPE recommends regarding this quarry, must be consistently applied to any other future quarry proposals in the area. My particular concern is the planned use of ONLY road haulage, given that the vast majority of output is undoubtedly destined for far beyond the local market (eg to Sydney). Without rail transport, the consequence will be 100s becoming 1000s of additional long distance fully laden PBS grade quarry trucks on the already congested road network. The congestion will only grow in the 30-year consent period. The output of all existing and proposed hard rock and sand quarry operations in the area bound for the Sydney basin will likely approach 10 million tonnes per annum. A plan for rail must be factored into this and other nearby extractive industry proposals.

Additionally, any conditions recommended to the IPC, regarding permitted hours of quarrying and transport operations, road infrastructure upgrades, permitted haulage and arrival routes, dust suppression, preventing any gravel from falling off trucks onto 100+kph highways to smash windscreens etc, must also be consistently applied to any further quarries in the area.

A detailed explanation of these matters follows.

Road Haulage

There are many similarities between this and the southern tablelands quarries near Marulan. They are a similar distance from Sydney and have a national highway nearby. However, the vast majority of haulage from those quarries is by rail. Rail must become a factor in this proposal, given the expected

expansion of extractive industries in the Balickera area. Even though the Marulan area quarries despatch a minority of their output via road, significant road, intersection and interchange infrastructure were still required to access the Hume highway. Very clear parallels with this quarry's proposed use of the Pacific highway. The DPE must apply road infrastructure conditions similar to those in Marulan, before production can exceed say 10% of consent limits.

1. All quarry haulage trucks servicing Italia Road quarries must NOT use the western end of Italia Road for arrivals or departures, unless they are servicing "Local" destinations.
2. Loaded trucks leaving any Italia Road quarry southbound must not turn right across the northbound A1 lanes but must turn left and travel north to the next overpass/interchange before heading south. So too must any empty trucks arriving from the north. They must NOT use the southbound A1 turning lane to turn right into Italia Road across traffic but continue to the next overpass/interchange which is currently 9.5km to Richardson Road.
3. All trucks must thus enter Italia Road by turning left while northbound. This will require a deceleration lane constructed to AustRoad standards for northbound A1 traffic to turn left into Italia Road.

Rail Haulage

Given that this and any future quarry proposals will far exceed the local Hunter valley market demand, it's clear that the vast majority of the output will be destined for further afield, mainly the Sydney market.

Rail must become the major haulage mode for this and other quarries delivering to the Sydney basin or to the north coast. The hunter valley coal industry had to phase out road haulage and use rail in the interests of public safety and avoiding traffic congestion. The same applies here.

The Gunlake quarry expansion on the southern tablelands was recommended for approval by the DPE, then rejected in 2017 by the IPC as "not in the public interest" over concerns about road haulage safety but was subsequently approved, with conditions, by the LEC.

The link below is to the IPC and LEC determination documents. Of particular interest, in the "LEC Conditions of Consent_2017_108663" is **section 29**, is about a 10-yearly review of transport (ie rail) alternatives. That section is reproduced below.

<https://www.ipcn.nsw.gov.au/cases/2016/12/gunlake-quarry-extension-project>

Within 10 years of commencing development under this consent, and every 10 years thereafter, the 29. Applicant must commission, commence and pay the full cost of a Transport Options Review for the development. This review must:

- (a) be conducted by a suitably qualified, experienced and independent expert/s whose appointment has been endorsed by the Secretary;*
- (b) include detailed consultation with Transport for NSW, RMS and Council;*
- (c) review the economic, social and environmental costs and benefits of all reasonable and feasible options for the transport of quarry products from the site (including by rail and including trucks movements currently permitted by this consent);*
- (d) recommend any appropriate measures or actions to reduce the economic, social and environmental costs associated with transport of quarry products from the site, and*
- (e) be conducted and reported to the satisfaction of the Secretary.*

Within 12 weeks of commencing this review or as otherwise agreed by the Secretary, the Applicant must submit a copy of the review report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the review report.

If rail haulage is not mandated for long distance deliveries in any approval, a similar condition to the above must be imposed.

Additionally, the PSC road haulage levy will be negligible as its only for ~1km of local road. Given that rail must be the outcome within the short to medium term, please consider a consent condition where Italia Rd quarries must also pay a haulage contribution to NSW Government, for the eventual provision of a rail line to service quarries in the area. eg \$1/tonne or more.

Hours of operation

Any recommended conditions for the hours of blasting, primary crushing, secondary crushing, loading and despatch, and the arrival of trucks, etc, must become the template for any other future quarries on Italia Road. Both for the consistency of residents, and road users, but also in fairness to not give undue competitive advantage to any particular quarry operator.

The save Balickera Residents group will have the most appropriate view on what the hours of operation restrictions should be. Night operations and lighting must be strictly limited by the hours and type of lighting to avoid interference with fauna, as per the recent government guidelines.

Rogue Gravel

The very short distance between the proposed quarry and the Pacific Highway will provide very little opportunity for rogue gravel to fall off trucks before they enter traffic at 100kph. This is an extremely serious safety issue.

Rogue gravel is my term for un-contained gravel that falls off trucks after leaving the quarry. The loading operation spills gravel in many places other than within the truck and trailer's body: on the rim, drawbar, mudguards, external ribs along the sides and the tailgate lip etc. Any gravel heaped up to the brim will also move and fall out from underneath loose tarps when the truck starts to move. All rogue gravel must be removed prior to departure.

Gravel falling off trucks at high speed in multi lane traffic results in broken windscreens and other vehicle damage. Drivers will flinch from the gunshot noise of an impact at speed and be distracted from their main task. Vision at night, and in wet conditions will be hampered. The larger rocks left on the road will cause drivers will swerve to avoid them, or if struck, result in tyre blowouts. Either way, serious multi-vehicle accidents can result.

Don't allow rogue gravel to cause serious injuries or deaths and the resulting road closures while the carnage is cleared and investigated. Broken windscreens and headlights and damaged panels from rogue quarry gravel are also a serious economic impost on other road users. Each windscreen replacement costs in the order of \$1000 not including the lost productivity for workers taking time off for the repairs.

I am familiar with the issue of rogue gravel as we live and drive on the Brandy Hill quarry haulage routes and have had several cracked windscreens while traveling on those routes, most within 6km of the quarry. We witness gravel bouncing along the road behind quarry trucks, we see the spills of quarry gravel at intersections, in front of our house and particularly near bumps along the haulage routes. In the same period, I have driven vastly greater distances elsewhere for work and holidays

without one broken windscreen. Anecdotal feedback from windscreen replacement services is that Brandy Hill is a hot spot for broken windscreens. One said that his mobile service has visited most properties in Brandy Hill! This is not just a phenomenon that happens to me.

Rogue gravel mainly falls off soon after leaving the quarry: at the first intersections, bumps and turns, and as vehicles get to highway speed the slipstream blows more off.

Brandy Hill Quarry's code of conduct to not heap loads to the brim, to tarp securely and to check and remove rogue gravel before departure, have not addressed the issue. It continues to be a major problem for local road users. Despite imploring the DPE and IPC for better controls of rogue gravel, the pending Brandy Hill Quarry IPC consent includes nothing to address the issue.

Rogue gravel on local single lane local council roads with 80kph speed limits has not concerned the DPE and IPC to date but allowing it on the high-speed national Pacific Highway cannot be permitted.

The proximity that this and the other nearby proposed quarries are to the Pacific Highway, means that rogue gravel will not have fallen from trucks before they join the highway. Best practice measures must be mandated to ensure that rogue gravel does NOT leave the quarries.

What those measures are is for you to determine. When Martins Creek Quarry was operated by Daracon, damage from and concerns about rogue gravel lead that quarry to install a "truck shaker". I have no details of what that entailed.

If you do determine that this quarry proceed, please include stringent controls on rogue gravel because of the proximity to a national highway. It is a serious and immediate threat to health and safety and economic outcomes and must be addressed. It is pollution of the most dangerous kind.

Conclusions on final page.

Conclusions

I object to this quarry on the basis that the impacts on people and the environmental damage to the near pristine state forest habitat, are unacceptable. Especially considering that this state forest adjoins a national park forming a key wildlife corridor, and the worsening plight of our iconic koala and other fauna and flora.

If the DPE does decide to recommend approval despite the negative environmental and social impacts, then stringent conditions must be applied to:

- Restricting the permitted hours of operations, for the protection of residents and fauna from noise and light pollution. Vehicle movements must be avoided in dawn and dusk periods due to wildlife being most active at these times.
- Special lighting requirements to minimise upward light pollution given the site is surrounded by state forest habitat.
- Require road transport infrastructure upgrades for slip lanes for both left turns into Italia Road and left turns out of Italia Road, to avoid ALL trucks crossing A1 lanes of traffic, before operations are permitted to exceed say 10% of the consented output.
- Banning all unavoidable movements along the western end of Italia Road, and trucks crossing traffic lanes as per the prior point.
- Best-practice controls must be applied to controlling noise, dust, air and water quality as usual, but in addition, particular controls must be applied to preventing of rogue gravel from being a huge safety risk on the highway, given the proximity.
- The NSW government must mandate the provision of rail access and require the use of rail in the interest of public safety and avoiding unnecessary traffic congestion, possibly by applying a levy to help fund that infrastructure. Alternatively, set a condition as per the LEC ruling on Gunlake requiring periodic reviews of transport options, with a limit on tonnes by road to the Sydney basin, after which Rail becomes mandatory.
- Any conditions attached to this proposal must be used as a blueprint for any other quarry proposals in Balickera, to give fairness and consistency to residents, road uses and operators.

End