

Email: vowwandsurrounds@gmail.com

3rd November, 2023.

Re: Wedgerock Pty Ltd - Karuah South Quarry
SSD – 8795

This submission is written on behalf of members of VOWW (Voice of Wallalong and Woodville) in support of those residents who are going to be impacted by yet another quarry, namely Karuah South, in their area.

VOWW is well versed in the impacts that quarrying has on residents living in the vicinity of such projects. Residents in our area have experienced impacts of noise, dust, night-time operations, blasting and vibrations, haulage truck movements, gravel spilled onto roads breaking windscreens and the resultant loss of amenity and character. This was documented and reported to DPE and the IPC regarding the Hanson Brandy Hill Quarry and Daracon's Martins Creek Quarry. We also understand how difficult it is to have these concerns taken seriously with consultants using "government guidelines" to abrogate any responsibility for the proponent.

Social Impact.

It is disturbing to see that the Social Impact Assessment for the Karuah South Quarry has all but ignored the cumulative impact that the numerous existing quarries already has on the residents.

The consultation process with residents identified 11 major impacts that were of concern to the residents.

- *Social amenity impacts from noise, dust, water management and the visibility of operations.*
- *Impacts to decision making systems, particularly the ability of the community to influence matters that impact them.*
- *Changes to way of life through how people experience their homes.*
- *Fears and aspirations for how the operations would impact their lives in the future.*
- *Access to public and private infrastructure.*
- *Changes to the local sense and experience of community.*
- *The potential for a decrease in property value.*
- *Changes to individual or collective sense of place.*
- *Impacts to the natural environment.*
- *Health and wellbeing.*
- *Local culture and heritage.*

These are by no means trivial issues, yet the conclusion as to how these problems can be overcome seems surprisingly simple, according to the report written.

*...a range of mechanisms have been proposed to mitigate residual social impacts. **This involves presenting information to the community on an ongoing basis and gathering feedback annually for presentation in reporting.***

For example, I doubt that letting residents know that there will be dust issues is going to stop the dust or that letting the quarry operator know in an annual report that home owners are concerned about the cracks appearing in their houses due to blasting/vibrations, is going to stop the quarry from blasting.

It is trivialising the problems that people currently face from the existing quarry operations in the area and will face in the future from the Karuah South quarry.

The Social Impact Assessment states:

Individuals are likely to experience impacts from the existing operations and the proposed Project differently. For example, what may be considered an impact by one individual may be not register with another.

Stakeholders, it seems, have different problems. These problems have been voiced at public meetings and should not be dismissed.

Individuals will experience issues in different ways and at different times. For example, some residents can no longer open their windows because of dust issues, others find it mentally disturbing to be confronted with the noise of crushers and others will report their safety concerns when travelling on the roads with haulage trucks. One household might have a shift worker who finds it hard to sleep during the day due to the noise of blasting or crushing. Another person might suffer from asthma and finds the dust a health issue.

It seems from this quote that these problems are therefore able to be dismissed. It is quite logical that some people experience different aspects of this project in different ways. That does not make the issues any less important. Taken in isolation a single problem might seem minor, however, cumulatively a picture emerges of a larger social problem for a whole community that can't be ignored.

Some residents are experiencing extreme mental stress and depression, and this is reflected in public meetings but has not been addressed in this Social Impact Assessment. Other physical health issues, short and longer term, are considered "acceptable" in this report.

The residents objecting to the Karuah South Quarry already have experiences from the other surrounding quarries and should therefore be taken seriously in their concerns.

*The assessment has identified that the community, particularly within the Principal Amenity Impact Area, is currently **experiencing negative social impacts** from the existing quarries in the area. The impacts are principally related to amenity in the local community. In addition, **the community's lack of confidence in the operators** and in regulators to effectively manage the operations has **created concern for potential future impacts**.*

However, the report states that:

*Reporting on the operations of the nearby Karuah East Quarry indicates that the operation is satisfying all relevant assessment criteria...**cumulative residual amenity impacts would be acceptable**.*

No wonder people have come to the conclusion that no one is listening to them and believe their lives don't matter.

Road haulage.

The EIS report states that The Branch Lane will be used to transport quarry material to intersect with Booral Rd leading onto The Bucketts Way.

The Branch Lane to the west of the Site connects to Booral and Stroud in the Gloucester Valley. This road may be used by drivers coming from this area towards Karuah or the coastal areas to the east of the Site.

While this road is shorter by a few minutes (see image below), it is in no way suitable for heavy haulage vehicles. It does not comply with any standards set by TfNSW or Austroads. It winds through farmland and large lot residential, through natural forest and environment and these vehicles would bring truck noise into an environment that would never normally experience it. This road should not be used for any truck traffic as The Bucketts Way is more easily accessed via the Pacific Highway. We question the inclusion of The Branch Lane when the infrastructure to access the Pacific Highway is already in place.

- Have the residents who live along this route been made aware of this proposal?
- Will Wedgerock Pty Ltd pay for the upgrade of this road and will they be paying a haulage levy to council?

I would like to bring to your attention the **ACTUAL STATE** of The Branch Lane. I can only assume that the consultant has done the evaluation via 'desktop'. I have travelled this road recently to assess its condition. I took photos which I have attached to this submission. Within 200metres from Andersite Road The Branch Lane turns into gravel road. It is poorly maintained, potholed, corrugated, extremely dusty and one can assume dangerous in the wet. It is winding with 45kph signposted corners, narrow and barely room in some cases for trucks and cars to pass and in many cases not wide enough for 2 trucks to pass each other. There are blind corners with crests. These conditions are dangerous to residents who need this road to access their properties. While travelling along the Lane we encountered 2 gravel trucks travelling in the opposite direction at a speed that I considered less than safe. The dust of the first made the sight of the second problematic. In fact, in the EIS presented by Wedgerock, concerns were already raised by the community in 2014.

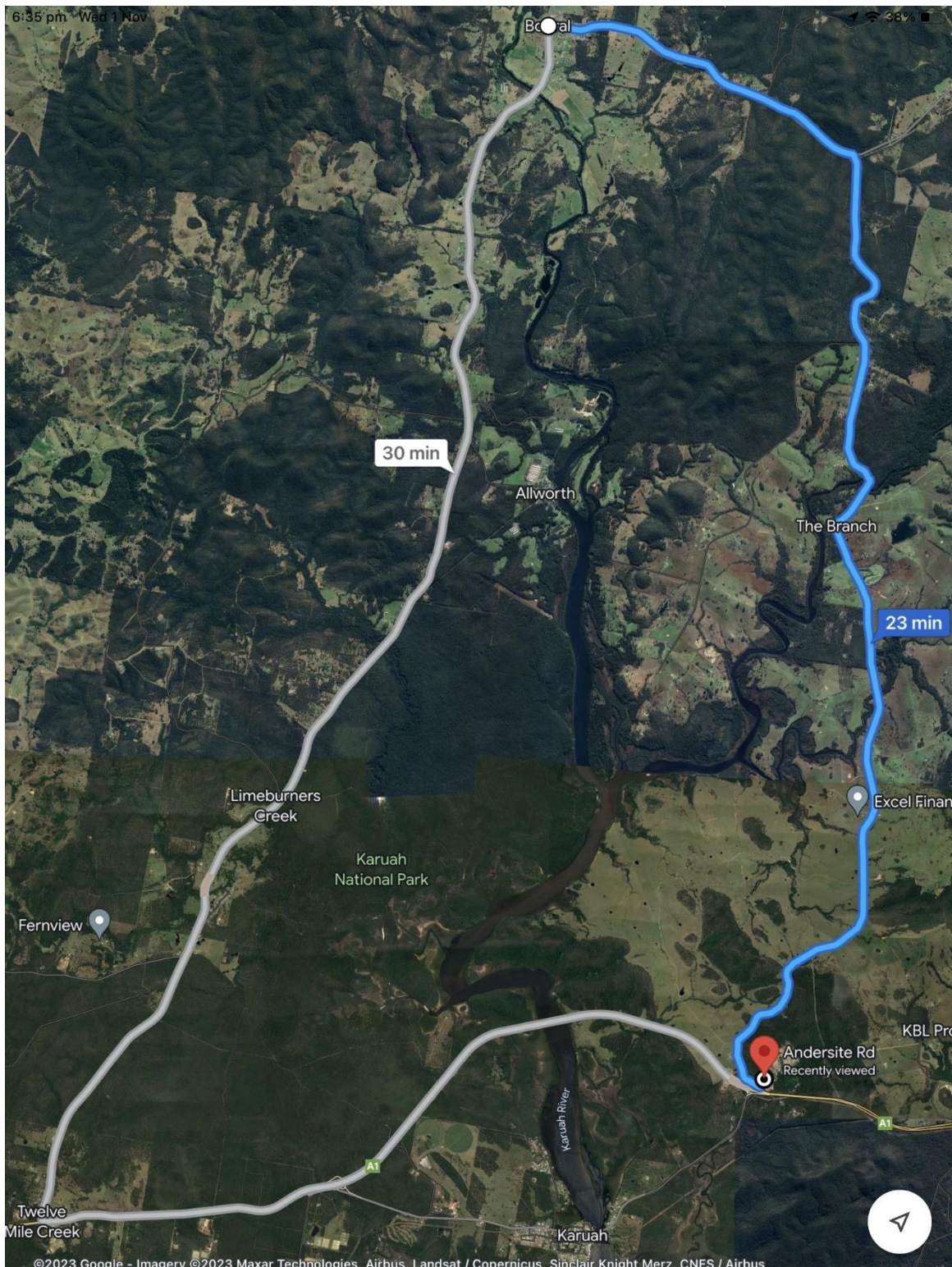
One of the: *key issues ... identified from consultation and community submissions received during the development approval process for the existing Karuah East Quarry which was approved in June 2014, was **Truck use and behaviour on the Branch Lane.***

This was not addressed then and is being ignored now.

The fact that the proponent believes this to be a valid alternative is beyond belief. This road does NOT comply with any standards for haulage whatsoever. The Branch Lane should only be used for local deliveries needed to customers along that road.

V.O.W.W.

Voice of Wallalong and Woodville
Including Localities of Rural West Ward



The above shows the routes linking the quarry to Booral. The Branch Lane (blue), while of a poor quality, dirt road, is only marginally shorter in time.

V.O.W.W.

Voice of Wallalong and Woodville
Including Localities of Rural West Ward



The exit to the quarry shows the gravel that is spilled by trucks as they leave the site.



Within 200 metres of Andersite Road the Branch Lane deteriorates into a potholed road.

V.O.W.W.

Voice of Wallalong and Woodville
Including Localities of Rural West Ward



This picture shows the surface of the road is quite corrugated and has sharp bends.



Here the road is narrow with a tight curve. It would be difficult to pass an oncoming truck safely on this section of the road.

V.O.W.W.

Voice of Wallalong and Woodville
Including Localities of Rural West Ward



A blind corner on a narrow section of The Branch Lane.



2 trucks passing although the second truck is obscured by the dust. We pulled over to allow the truck to pass safely when we noticed the second truck.

The Proponent must take all practicable measures to minimise the tracking of mud or other materials by vehicles leaving the premises. (EPA 21/10/2019)

This is another issue that is never addressed by any report and flies under the radar time and time again. That is **the gravel that is spilled onto the road** whenever a haulage truck leaves the quarry site and for several kilometres thereafter. In the case of the Karuah quarries there is gravel strewn across the road at the Andersite Road intersection and then onto the Tarean intersection where it enters the slip lane onto the Pacific Highway. Then along the highway itself for quite a few kilometres where gravel can be seen in the middle of the lane and heaped along the verge. The photos show this. The danger is to the vehicles travelling along the highway at 110kph unaware of the stones that could be thrown up and break windscreens. At such speeds there could be tragic consequences. Current practice is totally ineffective in preventing gravel from falling off trucks onto the roads. And of course, other road users pick up the cost of broken windscreens, headlights, duco/paint damage to front of vehicles.

Clearly the EPA requirement, as stated above, is not being met by the trucks exiting the Karuah quarries and assume this will be an ongoing problem for the Karuah South proponent.



The intersection of Tarean Rd with the Pacific Highway. This shows the loss of gravel from haulage trucks.


V.O.W.W.

Voice of Wallalong and Woodville
Including Localities of Rural West Ward



More gravel loss spilling onto the edge of the road.



It is obvious from this photo that the gravel spillage is extensive along the acceleration lane where trucks enter the highway. If you look closely, you will notice individual pieces of gravel distributed along the right side of the white shoulder line, indicating that these are quite recent. (Some indicated by ). Each piece of spilled gravel poses a risk, multiple times to other traffic. Firstly, as it falls

V.O.W.W.

Voice of Wallalong and Woodville
Including Localities of Rural West Ward

from the truck and bounces up from the pavement, and then potentially repeatedly thrown up from tyres until it ends up off the road lane. We personally have had windscreens broken by quarry trucks by both scenarios, as have many people on the Hanson quarry haul routes.



2 photos showing the spilled gravel heaped on the shoulder less than a kilometre along the highway. The accumulation in the shoulder drain is obvious all the way to the Karuah River. This is a concrete pavement, so the gravel is definitely not from the road surface itself.



The additional **cumulative impacts of all quarry truck traffic** must also be taken into consideration. Karuah South will have over 250 trucks per day which will add to the haulage truck numbers that are already accessing the Tarean Rd intersection from the multiple Karuah quarries. In addition to those trucks all quarry trucks that access the Pacific highway from the Italia Road intersection south of Karuah must turn left out of Italia Road and do a U-turn at the Tarean Rd intersection to return south towards their markets in the Sydney metropolitan area. Cumulatively, with the existing Boral quarry seeking to expand to 2mtpa, and 2 new quarries to be assessed (Stone Ridge and Eagleton) combined with the Karuah quarries, there will be an estimated 2,600 trucks per day using the Tarean Road intersection and then travelling along the Pacific Highway through Heatherbrae, Tomago and on to the M1. There are dangers for other road users associated with such large numbers of heavily laden vehicles.

The type of cover for noise and dust generating machinery suggested by Wedgerock (Submissions Report 2019) will not solve the problems of excessive noise generated by the quarry unless it is also soundproofed. Is this going to occur?

Hours of operation.

In its “Response to Submissions” 21/10/2019) the EPA has made the following recommendations.

Extractive and crushing, grinding and separating activities at the premises may only take place between the following hours:

- a) 7:00am-6:00pm Monday to Friday;
- b) 7:00am-1:00pm Saturday; and
- c) at no time on Sunday's or public holidays.

No mention is made of hours applicable to haulage or maintenance.

The DPE, however, has questioned the timing of haulage

The proposal includes the commencement of trucking operations from 5.00 am Monday to Saturday. Please provide details of why it is necessary to commence at this time and how the amenity of nearby residents would be either protected or else impacted.

Justification for the 5am start for haulage:

Product despatch operations would be limited to the hours of 5:00am to 6:00pm Monday to Friday and 5:00am to 1:00pm Saturday. As fauna such as Koala are generally nocturnal movers, transport operations would avoid the highest risk periods.

No mention of the impact to nearby residents is given. From experience we know that the empty trucks that will begin transport of product will arrive well before 5am. Therefore, the impact of truck noise and possibly loading for a 5am despatch will be felt much earlier.

In addition to this, the quote states that the 5am start will not impact koalas which are nocturnal. Koalas are often active early evening and also into the morning, especially when mating. A 5am start for haulage is dark and therefore animals are not as visible to drivers. The IPC decision for haulage for Brandy Hill quarry was 6am to 6pm specifically to protect the koala population in the early morning and evening hours.

Karuah South has also stipulated a 24-hour window for maintenance of the plant.

Product despatch 5:00am to 6:00pm...

Maintenance 24 hours / day...

The flexibility achieved by the proposed operating hours would be important in order that the Operator can respond to large volume or urgent orders from its customers.

Can the proponent please explain how 24/7 maintenance can help with urgent orders.

This is unfair to residents as they will potentially be subjected to noise and lighting during the night. We suggest a reasonable time limit be mandated for this activity at the site: a time when residents are not trying to sleep.

There is a proliferation of quarries in this area with a DA for a potential quarry at Limeburners Creek, another Red Rock quarry near the existing quarries at Karuah, potential quarries at Stone Ridge and Eagleton off Italia Road, and an expansion to Boral Seaham quarry at Balickera. These all cut into the natural vegetation, have impacts on rural and large lot residential properties and will potentially destroy the character and ambience of the area north of Raymond Terrace to Karuah. It cannot be denied that eight, either existing or potential quarries, will have a cumulative impact in blasting, vibration, noise, light, dust, heavy haulage truck movements and loss of amenity and character of the whole area. Tourism does not get mentioned and yet some affected residents operate B&Bs or wellness retreats.

A letter from TfNSW (3/8/2020) stated:

TfNSW however does not support temporary closure of Blue Rock Close if traffic queue is anticipated to interrupt the operation of the Pacific Highway.

Obviously TfNSW has anticipated that scenario and with 123 haulage vehicles +30 light vehicles from this one quarry returning to the quarry site on any day, if Blue Rock Close is closed for blasting for any period of time, there is a chance that haulage traffic would queue out onto the highway. There are other quarry trucks that will be using the Tarean Road intersection and they could also be caught up with any queuing that might occur therefore, cumulative effect needs to be considered. Please take this into consideration when addressing this issue.

The concern expressed by TfNSW has not been addressed by the proponent.

The letter from the EPA (21 October 2019) addresses the concern regarding cumulative effect of dust should 2 quarries be operating concurrently.

*.... a revised **air quality impact assessment** is undertaken following the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW which:*

*i. **considers a scenario where the Karuah South Quarry and Karuah Quarry operate concurrently.***

Residents have complained about cumulative effect of several operational issues including the impact of dust on their everyday lives and their health but have not been heard.

In the DPE letter responding to the DA Amended Application (13/12/21), DPE has stated:

*I must remind you that assessments of the potential impacts of the amended project **should cover all relevant environmental aspects**. I can advise the technical assessments should be **consistent with contemporary guidelines, policies and relevant legislation** governing the assessment of these aspects and **should include all feasible mitigation measures to avoid or mitigate potential impacts of the project.***

We do not believe that any mitigation measures have been identified other than those mentioned earlier e.g. have regular meetings.

In addition to this there has been **no modelling done on the pollution from the road haulage on the environment and the population at large**. In our changing world governments need to meet targets to remove CO2 in the atmosphere. Every aspect of industry will have to scrutinise how this can be achieved and that includes the quarrying industry.

While there is no dedicated rail line to service these quarries at present, there is no reason why this cannot be a condition of consent that is negotiated between governments and the quarries between Raymond Terrace and Karuah. Increasingly haulage trucks are travelling through densely populated areas. New housing estates are being created where there once was bushland or farmland. The impact from road haulage on the present road system and the lifestyle and safety of residents can no longer be ignored. Diesel emissions are an environmental pollutant and should be treated as such and not ignored.

The extra road infrastructure and the maintenance to existing roads that need to be provided to service all these quarries and potentially new ones runs into billions of dollars. They pay nothing to use the highway network and only a small local road levy to councils.

Until a proper rail spur is mandated from, for example, either Martins Creek or Hexham, no new quarries should be opened.

Biodiversity.

The Department requires more information about the effects of the proposal on biodiversity found on the site. It notes that Koalas have been identified on the site and requires a full description of measures that would be undertaken to ensure that the local Koala population is not put at risk by this proposal. The Department is seeking further justification or review of the statement on page 4-73 of the EIS, and page 5-63 of the Biodiversity Development Assessment Report (BDAR), that “...it is considered unlikely that the project would have inadvertent impacts which would reduce viability of any adjacent native vegetation or habitat due to edge effects, noise dust or light spill, or disturbance to breeding habitats.

*And, ...there is potential for consideration by the Commonwealth of listings subsequent to 2012 under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act); and □ Koalas are **listed as Vulnerable** under the EPBC Act.*

The Biodiversity Report supplied by Ecoplan Pty Ltd for the proponent dated September 2023 is limited in its validity and has not correctly responded to the questions posed in the original evaluation by the DPE or any subsequent concerns. The report is based on survey data from 2012 and 2018. The koala throughout this report is listed as vulnerable not **endangered**. The relevant State and Federal Government legislations have not been addressed with respect to vulnerable or threatened species. The identification and mapping of vegetation types are from surveys dated 2012. Therefore, **any conclusions from this report regarding the biodiversity of the development site will be unreliable.**

No understanding of the koala is shown in the report. There are reasons why it is difficult to relocate koalas without an impact on their health.

Koalas:

- Are stressed by excessive dust, noise and night light and could ultimately lead to disease and resultant infertility.
- Increased quarry truck traffic will lead to increased vehicle strikes.
- The koala populations in the Port Stephens and Mid Coast LGAs are declining due to habitat clearing, dog attack and vehicle strikes. With koalas already endangered, habitat clearing will further lead to their demise in the area.
- Koalas moving because of clearing of their ‘home range’ are in danger of encroaching on the home range of another koala causing friction and possible death.
- The koala corridor is being compressed on this site and this will ultimately force some koalas onto the highway.

From these examples the solutions (or lack of) presented by the proponent are ineffectual in preventing population decline of an endangered species.

Conclusions

VOWW objects to the Karuah South quarry proposal on the grounds of:

1. Cumulative impact of multiple quarries to the residents, their health and the character and ambience of the area.
2. Cumulative impact of quarry haulage traffic on all road users in the vicinity of the quarry land and the wider community using the Pacific Highway.
3. The lack of safety measures to ensure that quarry product is not spilt or tracked onto the road system with the risk of broken windscreens etc. to other road users.
4. The lack of concern for the environmental issues.

Issues raised by residents who will be most impacted by the Karuah South Quarry proposal are quite clear but have not been addressed adequately in earlier reports or more recent updated reports. Even though a *social risk review* was in place the report considered the potential impact and consequences were mitigated and the report indicates that the operation will satisfy all relevant assessment criteria.

This may be the case on paper via social risk matrixes etc however no matrix can ever mirror reality.

Quarry haulage routes have not been adequately identified and use of The Branch Lane would impact on more residents on a local road that is dangerous and totally unsatisfactory for road haulage. As shown, this road is already being used and the relevant council should be notified immediately that the Branch Lane does not meet the relevant standards for haulage.

The DPE shows quite clearly that it has concerns about the environmental reports that dated back to 2012. Since then State and Federal environmental laws have been strengthened, koalas have been declared as endangered but we have seen no mention of new reports that address these issues.

Cumulative impacts are not taken into consideration yet they will have an impact on the daily lives of nearby residents and those who live along the Pacific Highway and travel on it.

These impacts include:

- Noise from multiple crushers in all quarries.
- Dust from all quarries surrounding the Karuah South site.
- Noise and vibration from multiple quarries.
- Visual impact of quarry operations.
- Night lighting of quarry premises.
- The change to the character and ambience of the area when there are multiple quarry operations.
- Health impacts.
- Haulage truck numbers from these quarries and cumulatively along the highway heading south when other quarry operators access the Pacific Highway – from the Hanson quarry entering at Raymond Terrace and the sand quarries that enter from the Tomago intersection.
- The effect on the wildlife that is continually being pushed further away from preferred habitat.

We hope that the DPE will review all submissions with a clear view to the enormous toll this extra quarry, Karuah South, in the Karuah area will have on a vulnerable community already struggling to accept the situation they are in.



We also note the lack of true mitigation for some of the contentious issues such as starting time for haulage, 24 hr maintenance, poor enclosures for dust and noise generating equipment and recognition of the health implications for residents and their animals.

Regards.

Margarete Ritchie.
(President VOWW).