

Attention : Director – Coal and Quarry Assessments  
Planning and Assessment  
Department of Planning, Industry and Environment  
GPO Box 39 Sydney NSW 2001

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Dear Sir/Madam

**Re: Public submission for SSD – 7293, Sancrox Quarry Expansion Project**

Thank you for the opportunity to write and put forward our significant concerns and thus objection to the proposed quarry development at Sancrox.

This development proposal has so far attempted to fly under the radar for local residents. Proper consultation and acknowledgment of the impacts of the development is required and we call for the rejection of the proposal in its current form. Objective actions and penalties also need to be considered as it is significantly lacking in this submission.

We reject the proposal on the following grounds

1. Groundwater
  - a. This is one of the most concerning aspects to this proposal. We hold a bore licence which has not been taken into account. We are located in the Southern aspect of the modelling area with the greatest modelled drawdown (and greater than the acceptable drawdown considerations). Our property is also elevated, with a shared Byabbara aquifer bed with the mine, thorough the same fracture network. We are at a very high risk of impact, including drawdown of 3 to 7 metres or even more. Our basic water right is to be impacted. The response to “make good” is insufficient and concerning. Would the company pay for replacement pumps due to a deeper bore being needed? Would they pay for incremental electricity costs for the next 30 years due to a greater pump and head being required? How would residents achieve this commitment (through the courts if Hansen declined to come to the table)? Their “make good” as a motherhood statement is entirely insufficient. Additionally, this could have an impact on our ability to stock cattle or horses, to the point where it may also affect future property values.
  - b. Residents with bores need more time and more information to understand the real economic impacts to their properties and greater detail and commitment as to what the company would do to “make good”.
  - c. There is mention of annual reporting for groundwater impacts, but no mention of to whom that report is delivered, nor what the outcomes would mean. There are no penalties for breaching nor directions to correct the impacts.
  - d. There is mention that at the end of life, the quarry will be left as a “pit lake”. This is of great concern from an ecological perspective.

- e. The company has a poor record of groundwater management and was fined in 2016 for breaches (ref: EPA 24.03.2016). There is a low level of trust that the company would honour “make good”.
2. Social and Economic Impact
- a. The reports conclusion and discussion was based off the premise that “does not involve significant change to land uses at this location”. This is incorrect as the operations at the site would include an additional concrete batching and asphalt plant. Further operations of the site from business hours to 24 hours 7 days a week constitutes a **significant change in usage**. What follows is an incorrect assessment and inaccurate submission.
  - b. That the “efficient and cost effective delivery” is of social benefit. Rather this statement is misleading and false, as this is a **business benefit to Hansen**. This should be removed from consideration as to the social benefits of the proposal. Rock mining, asphalt and concrete crushing is and can be done at other sites, it is an additional service not a sole service in this area.
  - c. It must be noted that impact of this project is “likely to be positive...provided that the localised...negative social impacts are mitigated and monitored”, whilst there is only broad non-specific statements as to how these significant negative effects will actually be mitigated. Objective measurements must be undertaken, objective reporting and consequences for breaches must also be part of any project review for all parties. References such as “beyond control of Hansen”, “feasible and practical efforts” only demonstrate the inadequate means to which residents will be able to hold Hansen to account if/when they breach their requirements.
  - d. There is already poor record by the company in community consultation. Residents only found out about this by another residents letterbox drop. Hansen was not proactive or open about the plans. Submission time frames have been quick and does not allow residents proper scrutiny or response to the 1500+ page report. A proper consultation process should begin and submission time frames restarted. If this is the beginning of the process, Hansen have already demonstrated their contempt for the local residents and there is concern that they will only continue with this degree of engagement during the construction and into the future mine site.
  - e. 24 hour operation should be absolutely rejected, these processes do not need to run throughout the night.
3. Truck movements
- a. There is a significant 24 hour a day increase in movement of trucks to almost 800 per day. This will have an incredible impact on the safety of Sancrox Road, and also push more local traffic to other local roads to avoid this heavy vehicle bottleneck. Data obtained for this report is inaccurate or old, given accident along Bushland Drive in 2019 was not in place. Not only will this have a safety impact as there is an increased population in Sancrox (which was NOT modelled properly), but it will have a cumulative noise impact in the entire area.
4. Fauna
- a. Loss of a large amount of bushland is concerning. As veterinary scientists we can say that the ecological study was basic at best a few years ago, with rather dubious and brief techniques for survey. This is what Hansen has relied on to indicate the loss of bush is acceptable.

- b. Given the extent of bush loss recently with fires and extreme koala population pressure, bush such as this should be retained for potential resettlement.
- c. There is no analysis of light and noise pollution impact on fauna. This should be properly studied and understood. There is a small but viable Powerful owl population locally, for example, that may be impacted with hunting in the area.
- d. Bush in this area provides a corridor for travel and not just for accommodation.

#### 5. Noise Impacts

- a. As stated in the report, this is a rural area. The area has a quiet disposition, with some impact of the highway. The highway is sporadic (NOT constant), and thus having another sporadic or even constant noise emission is of great significance. This cumulative effect cannot be misunderstood. This will become a 24/7 noise source with the only requirement that Hansen laughably “procure quietest machinery”, but as long as it still fulfils the machine function. This is a ridiculous and insulting mitigation strategy and only speaks to the lack of accountability to the residents should noise levels be breached.
- b. Residents do not have complex or expensive monitoring equipment to be able to test and monitor noise emissions. Equipment should be supplied to residents and reports made public with strict penalties to exceeding acceptable levels.
- c. Comment that cumulative noise levels are “beyond control of Hansen” is not true. If Hansen is contributing to the cumulative noise, then they are totally in control of the overall output. This should be corrected and refactored in control strategies prior to any further consideration.
- d. According to the submission noise levels are going to exceed acceptable levels for properties South of the mine. This alone is enough to reject the proposal.
- e. Report only indicated maximum background noise. It is possible that the noises were made from bird calls. It should be reported as to the cause of the peaks of the noises recorded. There is a significant difference between rural animal noises and mining activity, thus all noise cannot be treated equally.
- f. Truck activity broadly will increase and along with it noise, thus there is 796 truck activities adding to the overall sound scape in the local area and along the highway, 24 hours a day.
- g. It is entirely inadequate for the mitigation strategy to for the impact of noise pollution to “reduce by feasible and reasonable measures”. This is another example of unenforceable control measures plaguing this report and submission. Residents need a much greater objective understanding of the measures and fallbacks for this project prior to any further consideration.
- h. Noise impacts only considered the “average person” and has not taken into account the noise (and light) impact on local animals, including nestings, breeding, hunting.
- i. Adoption of sleep disturbance levels is high and over exaggerated given rural nature of the area. This should be refactored and reassessed.
- j. We find that identified sleep disturbance levels south of the site for 12 months an incredible admission. This is a very long time and is totally unacceptable.
- k. Controls and mitigations such as “Good practice construction necessary”, such that “ICNG focuses on minimising noise impacts rather than achieving numeric noise levels” is inadequate.
- l. Findings “noise emissions would exceed the PSNL during all modelled conditions” excluding the additional cumulative road noise from trucks at 792 movements a day should mean rejection of the proposal.

- m. Admission and context that “noise from construction sites is inevitable” provides an automatic “out” for any noise pollution at any time with no recourse.

There has been inadequate time to fully assess the submission and we call for rejection of the proposal. There is overstated and minimal employment benefits for what is an unnecessary 24 hour a day development with wide ranging environmental and social impacts.

Thank you for the opportunity to submit our concerns and look forward to being engaged properly in this process.

Best,

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