

9 December 2019

Attn: Director – Coal and Quarry Assessments  
Planning and Assessments  
NSW Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Sirs.

**Re: Sancrox Quarry Expansion Project**  
**State Significant Development application number SSD-7293**

1. I own land on Le Clos Verdun Estate which is a 142 lot rural residential subdivision located at Sancrox Road, Sancrox within the Port Macquarie Hastings Local Government area ("**Sancrox Estate**").
2. Sancrox Estate is itself a State Significant Development with application number MP06\_0212. Sancrox Estate is now currently under development and construction.
3. **The purpose of this letter is to express my opposition to the State Significant Development application number SSD-7293** lodged by Hanson Construction Materials Pty Ltd (the "**Application**"), for the expansion and development of the hard rock quarry known as Sancrox Quarry, that is located on Sancrox Road, Sancrox, and in close proximity to the Sancrox Estate.
4. Relevantly the Application proposes that the current 20 year life of the Sancrox Quarry be extended by 30 years by:
  - a) expanding the quarry footprint from an existing size of 17.18 ha to 48.61ha, being a **182% increase in the existing foot print of the quarry;**
  - b) increasing the annual extraction limit from 455,000 tonnes per annum to 750,000tpa, representing at **65% increase on the current annual extraction limit of the quarry;**
  - c) building a new concrete batching plant, with a 20,000tpa capacity, **to operate 365 days a year** from the site of Sancrox Quarry;
  - d) building an new asphalt production plant, with a 50,000tpa capacity, **to operate 365 days a year** from the site of the Sancrox Quarry;
  - e) building a concrete new recycling plant, with a 20,000tpa capacity, **to operate 365 days a year** from the site of the Sancrox Quarry;
  - f) **changing the current approved hours of operation** of the Sancrox Quarry from 7am to 5pm Monday to Friday, and 7am to 1pm on Saturdays, **to a 24 hours a day, 7 days a week, 365 days a year;**

- g) **changing approved truck movements and equipment hours of operation** from 7am to 11pm Monday to Friday and 7am to 1pm Saturday, Sundays and Public Holidays, **to 24 hours, 7 days a week, 365 days a year**; and

- h) allowing for blasting to take place from 8am to 5pm Monday to Friday.

(the “Project”)

## **Opposition to the Project**

5. I oppose the Project on the following grounds.

### **a) Failure to adequately recognise Surrounding Land Use**

The Environmental Impact Statement (“EIS”) lodged in support of the Project completely fails to address the potential impact of the Project on the 142 rural residential housing lots being developed at Sancrox Estate.

As far as I can tell, the only reference to the Sancrox Estate contained in the EIS is that a “*rural residential residence is located approximately 1km to the west*” (see part 14.2.1 of the EIS) which I presume is a reference to the Sancrox Estate, however the EIS otherwise contains absolutely no direct reference to the Sancrox Estate.

Further, Part E.3 of the EIS states that the “*quarry is ideally located away from substantial residential development*”. However given that 142 rural residential Sancrox Estate development is presently only 1km to the West of the existing quarry, any suggestion that the “*quarry is ideally located away from substantial residential development*” is plainly false and misleading.

The EIS also does not identify how close the Project and quarry boundary will be to the boundary of Sancrox Estate, should the Project go ahead. The Project proposes that the footprint of the quarry be extended by 31.43ha. Based on the information contained in the EIS, it appears that should the Project go ahead, the boundary of the Project/ quarry will be about 500 meters from the boundary of the Sancrox Estate.

I consider that by failing to directly identify or address the impact the Project will have on the 142 residential homes to be built at Sancrox Estate, the EIS is deficient and fails to adequately address the Project’s compatibility with other land uses in the vicinity of the Project in accordance with clause 12 of the *State Environment Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007 Act*.

On this basis the Application should be refused.

### **b) Scale of the Project**

The scale of the Project is vast. The quarry footprint to be increased by 182%. Its extraction limit to be increased by 65%. It will no longer just be a mine, but will

offer additional concrete batching, recycling and asphalt production services. Its hours of operation will be 24 hours, 7 days, 365 days a year, resulting in an enormous increase in the volume of traffic associated with the mine.

The EIS attempts to address each of these matters as a separate issue, however considering these matters separately is not a proper assessment of the effect they will have on the environment. These matters must be viewed collectively and the impact they will have on the environment should be considered to be cumulative. When viewed collectively and cumulatively, it is apparent that the impact of these matters on the environment and surrounding areas will be far more significant than the EIS would indicate.

### **c) Impact on environment**

The Project will require the clearing of 43.1 ha of native forest vegetation, including habitat for at least one threatened species. (EIS part E.6). While the EIS identifies a “*preferred offset strategy*” of “*ecosystem credits*”, I consider that this strategy is grossly inadequate and will never truly serve as a replacement of the flora and fauna that the Project proposes to destroy.

I consider that the destruction of 43.1ha of native vegetation including habitat for at least one threatened species, purely for the commercial benefit of the privately owned Hanson Construction Materials Pty Ltd, is a matter that needs serious consideration when determining whether approval should be granted to the Project.

I disagree that “*significant public benefit will be provided by the alteration [ie destruction] of this currently unutilised land [ie 43.1ha of native vegetation including habitat for at least one endangered species] by the Project, with a longer term, reliable supply of rock for local development projects becoming available*” (EIS part E.10).

Equivalent sources of rock are readily available to the public from sources other than Hanson. The Project (and the destruction of the 43.1ha of native vegetation) will not benefit the public, whereas the same cannot be said for Hanson's shareholders.

Any public benefit will be significantly outweighed by the detriment that the environment will suffer as a result of the destruction of the 43.1ha of native vegetation proposed by the Project.

As I write vast swaths of the State of NSW, and national parks, burn in unprecedented bush fires. As such I consider that any suggestion that the public will benefit from the destruction of 43.1ha of native vegetation including habitat for at least one endangered species, for the commercial benefit of a private company, needs to be viewed with great scepticism.

Further the Biodiversity Assessment Report prepared in support of the Application was based on insufficient and outdated field work conducted in 2015.

Current, independent and comprehensive field surveys are required to validate the finding in the Biodiversity Assessment Report.

For the above reasons the Application should be refused.

**d) Misrepresented on the NSW online Planning Portal**

The location of the Project is grossly misrepresented on the NSW online Planning Portal, which represents that the Project is to be located on Peats Ridge Road, west of Gosford, when in fact the Project is actually located approximately 315km north of Gosford, on Sancrox Road being approximately 8km west of Port Macquarie.

The misrepresentation of the location of the Project on the NSW online Planning Portal means that the Application has not followed due process and will not be coming to the attention of persons who will be potentially effected by the Project.

On this basis the Application should be refused.

**e) Noise impact**

The noise impact of a 24 hour, 7 day a week open cut mine will be substantial. The Sancrox area has already had a substantial increase in noise (24/7), due to the upgrading of the pacific highway to a motorway.

Those noise impacts are all the more noticeable, and intrusive at night.

On the basis that the Application seeks that the Project be operated 24 hours a day, 365 days a year, the Application should be refused.

**f) Misrepresentations contained in the EIS**

The EIS does not properly address issues affecting the determination of the Application and in fact appears to ignore and/or omit many factors that should properly have been addressed. Further the EIS contains several statements that I consider to be inaccurate. Instances of some of the inaccurate statements are as follows.

- i) The EIS states that the "*Project will allow for the sourcing of construction materials to be produced at a site that is highly disturbed*". This statement is false as the Project requires the destruction of 43.1ha of native vegetation including habitat for at least one endangered species.
- ii) No mention is made of the fact that there is an Endangered biological corridor (identified in 2015) which runs right through the middle of the proposed new quarry pit nor of the fact that the new pit will wipe out a "high and medium use" koala habitat as well as destroy significant swamp oak and eucalypt open forest areas which include several ecologically sensitive hollow bearing trees.

- iii) The traffic study in the EIS is defective and fails to accurately and honestly record the traffic to be generated by the development of the areas surrounding the Project, which have already been approved for development, such as the Sancrox Estate.

## **Conclusion**

For the reasons set out above, I object to the Application, and consider that it should properly be refused.

Further I am not an expert in this field, and do not purport to have fully read or understood the entire 1529 page EIS. However by reason of a lay person being able to identify the deficiencies with the EIS and issued with the Project that I have raised above, I am concerned that if it was looked at with a critical expert eye, it would be found to contain far more inadequacies and deficiencies.

Yours faithfully

A handwritten signature in cursive script, appearing to read "Oliver Hall".