

Hillview Hard Rock Quarry - Objection

To: NSW Department of Planning, Housing and Infrastructure

Re: Objection to the Proposed Hillview Hard Rock Quarry – Air Quality Report Errors and Health Risks

I write to raise strong objection to the proposed Hillview Hard Rock Quarry proposed for Maytoms Lane, Booral based on:

- The significant errors in the Air Quality Report (Appendix H) and the unacceptable risks to public health, particularly to Booral Public School and surrounding residents
- The impact on the local agricultural activities and local communities
- The impact on traffic safety on The Bucketts Way
- The impact on endangered species inhabiting the proposed quarry area.

Air Quality Report Errors and Impact on Booral Public School and Local Residents

Very significant risk air quality activities include drilling and blasting, crushing and screening, soil and overburden storage, which will happen on site. Moderate to high significant risks include storage of minerals within site and transport and loading within site which will also both happen at this site.

1. Errors in the Air Quality Report

The air quality assessment, prepared by Advitech and included as Appendix H of the Environmental Impact Statement, contains major factual and geographical errors that undermine its credibility and the reliability of its findings. Notable errors include:

- a. Misidentifying the location of the project as being in the Richmond Valley, which is approximately 300 km north of the actual site in Booral.
- b. Stating that the Eden Creek waterway is near the site, despite this being a Northern Rivers catchment with no relevance to Booral.
- c. Describing the extraction as involving “sand and sandstone”, when the project is for hard rock rhyolite, a silica-rich igneous rock that poses significantly greater dust and health risks.
- d. Referencing the removal of “clean sand, red sand, and sandstone” from the site, which directly contradicts the project’s EIS that clearly states the quarry will extract rhyolite.

These basic errors cast serious doubt over the accuracy of any dust dispersion modelling, health impact assessments, and mitigation strategies included in the report. A report that misidentifies the location and material being quarried should

not be relied upon to justify approval of a 30-year project involving hazardous airborne particulates.

2. Health Risks from Silica Dust

The quarrying of rhyolite will produce respirable crystalline silica (RCS). RCS is a fine particulate that can cause silicosis, lung cancer, and other irreversible respiratory diseases. The Advitech report itself notes potential exceedances of NSW Environment Protection Authority (EPA) dust criteria but classifies them as “slight,” “marginal,” or “minor.” Any exceedance of EPA health limits must be taken seriously, not downplayed. Moreover, the dust modelling:

- a. Uses data from 2018, during a drought period, which does not represent typical or peak dust conditions.
 - b. Fails to include cumulative emissions from the nearby Deep Creek Quarry, even though both projects will operate concurrently within a short distance of one another.
 - c. Provides no evidence of updated air sampling or dust control trials since 2018.
3. The report does not list Booral Public School as a Sensitive Receptor despite its location just 3 kilometres from the quarry boundary. Booral Public School is not listed as a sensitive receptor in the air quality modelling or maps provided in Appendix H. This is a serious omission, given:
- a. The vulnerability of children to airborne pollutants
 - b. The potential for dust to settle on school grounds, play areas, and classroom ventilation systems
 - c. The school being within likely wind dispersion paths, particularly during blasting and dry periods.

Booral public school currently has around 88 students and the associated staff. Sensitive receptors such as schools, must be identified when large-scale industrial developments are proposed nearby. Booral Public School clearly meets the definition of a sensitive receptor under both public health and planning principles. As noted above in the comments on the air quality report, blasting, crushing and transport of rhyolite creates fine dust particles including RCS. Children are vulnerable to environmental hazards particularly airborne pollutants as they are still developing lung function and capacity with higher respiration rates than adults. RCS has been linked to serious respiratory conditions including asthma, bronchitis, silicosis and lung cancer.

The project proposes that the quarry will operate six days a week for up to 16 hours a day over 30 years. Given the school’s proximity to the quarry, students and staff are at significant risk of long-term exposure to harmful particulates.

There is no clear buffer zone protecting the school from dust emissions or blasting impacts. The report does not include any proposal for dust monitors at the school and there is no information that any assessments have been conducted to determine how air quality on school grounds might be affected under prevailing wind conditions. As noted above the air quality modelling is based on outdated data or cumulative impacts from other nearby developments including Deep Creek Quarry. This raises significant concerns about reliability of the findings and is insufficient to assure the safety of vulnerable populations such as children and the elderly.

The noise modelling in the EIS is incomplete and fails to assess the potential impact of regular blasting on the nearby learning environment of Booral Public School. Blasting noise and ground vibrations can be distressing for young children and the Department of Education has a duty of care to maintain a safe and quiet environment beneficial to learning.

The failure to even acknowledge the school in the modelling demonstrates a lack of basic due diligence. It also means no mitigation measures have been proposed to protect students, teachers, or support staff from long-term exposure to silica-rich dust. I request that the proposal be rejected in its current format and that no further consideration be given until a comprehensive, independent assessment is undertaken that specifically includes Booral School.

4. Impact on Local Residents and Water Catchments

Residents in Booral and surrounding areas rely almost entirely on rainwater tanks for drinking water. Dust generated from the quarry, particularly fine RCS particles, can settle on rooftops and contaminate rainwater collected for human and animal consumption. This risk is not mentioned in Appendix H. In addition to human health risks, the dust will affect:

- a. Livestock that consume contaminated water or graze on dust-covered foliage
- b. Poultry farms that rely on clean water tanks for animal health
- c. Self-sufficient households with vegetable gardens and orchards exposed to dust deposition.

No dust monitoring stations are proposed for residential areas in Booral, nor have any baseline air quality readings been published for community comparison.

The Air Quality Report submitted in support of the Hillview Quarry proposal is fundamentally flawed. Its factual inaccuracies, omission of Booral Public School, failure to address cumulative impacts, and outdated data make it an unreliable basis for

any planning decision. The health of local children and residents must not be compromised due to administrative errors or downplayed risk assessments.

Impact on Local Communities and Agricultural Activities

Based on the information include in the Hillview Hardrock Quarry EIS there is a high probability that the quarry would significantly harm the region's agricultural productivity, rural lifestyle, and social fabric.

The land proposed for quarrying is highly productive and zoned as rural under the RU2 Rural Landscape zone. This area is known for its agricultural outputs, including beef cattle, poultry production (meat and egg), and small-scale farming operations. The quarry's 30-year operational plan threatens to replace sustainable land use with industrial-scale extraction, permanently removing farmland from production.

The Stroud–Booral region includes many families who rely on agricultural income and self-sufficiency. The area supports intensive poultry operations, fruit and vegetable gardens, and livestock grazing. As noted in the Air Quality Report Issues above, dust from the quarry will compromise animal health and contaminate water sources used by farmers. Particulate matter settling on crops, soil, and water tanks will reduce food quality and productivity.

In addition to environmental degradation, the quarry will disrupt the social structure of the community. The peaceful rural lifestyle that attracts residents and supports tourism will be degraded by blasting noise, heavy truck traffic, and loss of scenic landscapes. The project offers little in return to local residents.

While it may generate short-term employment, the long-term costs such as reduced land value, increased road risks, noise, and health impacts are borne entirely by the local community.

The Social Impact Assessment fails to properly engage with affected communities, including Stroud, Stroud Road, Stroud Hill, Nooroo, Craven, Wards River, and Weismantels. It also does not address growing populations in the area, or the impact on vulnerable residents who may lack the means to relocate or respond to worsening living conditions.

The project is incompatible with the Great Lakes Local Environmental Plan 2014 zoning objectives, which include supporting agriculture and protecting the rural landscape. Extractive industry is permitted only with consent and must demonstrate compatibility with surrounding uses. This proposal does not.

The principle of intergenerational equity is also ignored. Future generations will lose access to productive farmland and a clean environment. These are not renewable assets. Replacing agriculture with irreversible excavation is not sustainable

development. I urge the Department to reject this proposal in defence of the long-term social, environmental, and economic sustainability of our rural communities.

Impact on Endangered Species

The quarry will clear up to 48 hectares of native vegetation, including remnant and regenerating bushland. This is habitat for endangered species such as the koala, squirrel glider, and eastern false pipistrelle. Key issues include:

1. Outdated ecological surveys conducted during drought years (2015–2018)
2. Failure to reassess regrowth and habitat recovery since acquisition
3. Proximity to Karuah Nature Reserve and wildlife corridors.

The Biodiversity Conservation Act 2016 requires the avoidance and minimisation of harm to biodiversity, yet the quarry proceeds on the assumption of large-scale clearing with no updated field data.

Road Safety, Quality and Traffic Impacts

The Bucketts Way traffic has increased significantly in recent years due to an increasing population in local surrounding villages and farms, an increase in tourists visiting 'The Barrington Coast' region as promoted by Great Lakes Council and increasing activity from poultry farming and other agricultural and rural activities. The Traffic and Parking Impact Assessment conducted by McLaren Traffic Engineering & Road Safety Consultants (Appendix L) includes very limited data on the impact of the proposed quarry on road quality and traffic safety, particularly turning from Maytoms Lane onto and off the Bucketts Way and turning onto the Pacific Highway from the Bucketts Way.

A combination of weather and increasing traffic has resulted in poor road surface quality on the Bucketts Way over large areas between the proposed quarry site and the junction with the Pacific Highway. This has had significant impact on local residents who commute along the Bucketts Way for work and other necessary activities including damage to cars (particularly suspension, tyres and wheels), extended travel times, and added driving stress. Although significant works to upgrade the road have occurred over the past three years the road surface for previous works has already started to deteriorate (within one year in some cases) with dangerous potholes and rough road surfaces. According to Port Stephens Council (personal communication with the council) part of the funding allocated to the section between Limeburners Creek and the Pacific Highway has been diverted to other council road projects. Appendix L states that there will be an increase in traffic of 272 trips per day (two-way), which is a significant increase in heavy vehicle (truck and dog) loads on an already compromised road surface.

The traffic assessment Appendix L includes the following deficiencies:

- It only includes monitoring of traffic on one day (Monday 06 February 2023) between 6.00 am – 10.00am and 2.30pm to 7.00pm. This is not a representative sample for the six days per week that the quarry will be in operation
- The assessment does not take into account the significantly increased traffic flow northbound on the Pacific Highway on a Friday
- It does not include assessment of the impact of truck haulage during the very large increase in traffic that occurs during holiday periods e.g. long weekends and school holidays.
- It does not state the type of vehicle monitored at intersection turn offs e.g. cars, vehicles and trailers, caravans, campervans and trucks.
- It does not include the truck trips (currently estimated at 54 two-way truck trips per hour) from the Deep Creek Quarry at 279 Deep Creek Road, Limeburners Creek, which will also travel via the Bucketts Way. While there is a future assessment of these truck trips included, this only includes data for 2033 and not the impact as soon as Deep Creek Quarry commences operation.
- Appendix L table 8 states that there will be 27 heavy vehicle trips in the AM and 27 in the PM during a peak hour period of 9.00am to 10.00am and 2.45pm to 3.45 pm. This in no way reflects the actual peak hour times on the Bucketts Way.
- Traffic impact assessment has been assessed for 10-year growth but the operating life of the quarry is 30 years. The 10-year assessment indicates that the turn movements will fail and be above the capacity which the intersection can handle and that significant upgrades will be required. Locals have been requesting significant upgrades for many years as traffic flow has increased and there are no plans for such an upgrade. The increase in traffic each year will lead to annual worsening of the turn movements and there needs to be a concrete plan in place for significant upgrade works now. The suggested option in Appendix L is a roundabout, however, traffic travelling north will slow down as it approaches the roundabout decreasing speed from 100km/h to whatever speed limit is put in place for the roundabout. This will result in traffic backing up and the gaps to turn right from the Bucketts Way in that situation will be minimal, especially in peak periods.
- Appendix L refers to an alternative traffic route to ameliorate this issue but there is no suitable alternative. There are no details of this proposed alternative route in the report.
- Sight line assessment states that there is a 220m required sight line for turning right onto the Bucketts Way from Maytoms Lane. The sight line assessment shows that the required 220m sight line is not met. The sight line crosses to the opposite side of the road on well before the sight line is reached so trucks will be unable to see traffic heading towards Maytoms Lane from the south once the sight line crosses to the opposite side of the road. It is not clear how this meets

sight line requirements. There is no clear information on the proposals for upgrading the turning at Maytoms Lane for trucks going onto the Bucketts Way. Currently this is a gravel road with limited access and vision turning onto a main road with a 90km/hour limit, which is a risk to vehicles travelling both up and down the Bucketts Way.

- Appendix L states that the intersection at Bucketts Way has clear sight lines in both directions. This is inaccurate. From personal experience of the upgraded turning onto the Pacific Highway from the Bucketts Way, this turning is very dangerous. Traffic is travelling at 100km/h on the Pacific Highway and it is necessary to both cross two lanes of fast moving traffic on a very busy freeway and to watch for traffic turning right onto the Bucketts Way travelling south on the Pacific Highway. The “upgrade” has moved the turning lane for vehicles travelling north on the Pacific Highway to turn left onto the Bucketts Way, which now obscures the view for drivers turning right onto the Pacific Highway. This has greatly increased the danger of this junction. Trucks turning left onto the Bucketts Way totally obscure the view of traffic coming up the Pacific Highway and it is not possible to safely turn in that situation, which will result in traffic backing up and lead to an unacceptable risk of accident. Appendix L states that no works are required on this turning until 2033, which is inaccurate if traffic delays and accidents are to be avoided due to obscuring line of sight for all traffic turning right onto the Pacific Highway.
- The conclusion in appendix L states that with the cumulative assessment between the Hardrock Hillview and Deep Creek quarries, the combined impacts of both developments result in a LoS D for the intersection, which means it is approaching operating capacity as soon as both quarries are in operation. This is unacceptable to all communities who live along the Bucketts Way who are required to use it often daily for travel to work.
- Annexure G states that if drivers of heavy vehicles exceed a two-minute wait time to turn from the Bucketts Way onto the Pacific Highway then they are required to turn left on the Bucketts Way and complete a U-turn at Tarean Road. There is no way for a truck to manoeuvre to a left turn once they are in the right turn position so this is not a feasible alternative. There is also no left turn merging lane into fast moving traffic for trucks that do turn left creating a significantly increased risk of accident. With the combined heavy vehicle movements from both Hillview Quarry at Maytoms Lane and Deep Creek Quarry at Limeburners Creek based on a ten-hour period of truck movements this will amount to approximately 40 trucks heading south and turning right on the Bucketts Way per hour over a ten-hour period. If trucks can wait for up to two minutes to turn this could result in a major back-up of traffic on the Bucketts Way during peak periods and beyond. Locals are already aware that travelling down the Bucketts Way in peak holiday periods the wait time can be up to 30 minutes to turn right

on to the Bucketts Way. If this were to become a regular occurrence due to truck movements, it would pose an unacceptable impact on every local who has to travel to work down the Bucketts Way and for other essential activities.

- The increase in truck movements could also pose an unacceptable delay to emergency vehicles travelling down the Bucketts Way.

Conclusion

The project appears to be in conflict with:

- Environment Protection and Biodiversity Conservation Act 1999 (threatened species)
- Protection of the Environment Operations Act 1997 (pollution), Water Management Act 2000 (groundwater sustainability)
- Roads Act 1993 (infrastructure adequacy)
- Local zoning under the Great Lakes Local Environmental Plan 2014.

The Hillview Quarry project represents industrial-scale development in a rural area that is ecologically sensitive, agriculturally productive, and growing in population. Its failure to properly assess and mitigate health, biodiversity, traffic, and water impacts renders it incompatible with long-term regional sustainability.

I ask that the Department reject this proposal in its current form. The environmental risks, social and safety risks are too great, and the communities' concerns remain unaddressed.