

Dayanna Finch
1927 The Bucketts Way
BOORAL NSW 2425

30 June 2025

RE: Objection to Proposed Hillview Quarry Development (SSID-70557215).

To Whom it May Concern,

I write to lodge to my formal objection to SSID-70557215. I am a full-time resident and landholder adjacent to the proposed Hillview Quarry, with my property boundary on the southern side of Maytoms Lane, Booral. My home is situated 140 metres off The Bucketts Way and 130 metres off Maytoms Lane and will be irrevocably impacted if this development is approved.

After carefully reviewing the Environmental Impact Statement (EIS) and associated documentation, I am convinced that this project, as currently conceived, will impose unacceptable environmental, social, economic, and infrastructure burdens on our community. However, the most significant issues identified relate to the failure of the Applicant to conduct meaningful consultation with the community, and the omission of a “Zone of Affectation”.

1. Consultation

The Applicant hosted two separate onsite “drop-in” sessions, each lasting two hours, held within five days of each other (May 6 and May 11, 2023). In the two years since then, a proposed community meeting was cancelled, and no further consultation has been undertaken.

As an immediate neighbour of the site, I am disappointed that the Applicant made nil effort to approach me during the last 10 years since exploratory drilling commenced. As such, I refute the statement in Appendix S – Social that “Adjoining landowners were approached in advance of contact with other stakeholders.... These were then notified by surface mail to the identified mailing addresses.” I received no such correspondence, and it was only upon hearing that neighbours had received correspondence, that I took it upon myself to approach the consultant, Mark Sargeant of Aigis Group, and provide my contact details. I note that the last correspondence I received from the consultant in relation to a community meeting was on May 5, 2023. I had advised that the “drop-in” meeting times did not fit with my work hours or children’s sporting activities and was subsequently asked for my preferred days/times as they were working in with other people who were also unable to attend. I did, however, receive an email on March 26, 2024 (not on 21 December 2023, as stated in Appendix S – Social), advising that a community information session was to be held in April, however, that meeting did not eventuate.

The failure by the Applicant to engage in proper community consultation is evident within the submitted documentation, with concerns regarding increased traffic, destruction of animal habitats, and increased dust and noise dismissed as “insignificant” or “not considered to be important”. I refer directly to the conclusion of the EIS which states “The EIS demonstrates that the proposed quarry will not result in any significant impacts during construction or operation, nor any significant residual impacts following the closing and

rehabilitation of the quarry.” Perhaps if more substantial consultation was undertaken, and the concerns of residents recorded in a formal format, as opposed to the vague table provided in Appendix D – Community Engagement Table (that failed to detail the number of attendees) or the reliance on the four project team members and “the proprietor” recording “comments received by attendees” at the drop-in sessions, then the real concerns of the community could have been properly considered and acknowledged. In dismissing the community’s concerns, it must be noted that the Appendix S – Social identifies that “the most commonly expressed views of engaged stakeholder’s can be characterised collectively as ‘community withdrawal – rejection’, yet the author then dismisses this based on “relatively low participation”. If the people in attendance are a random sample of the community, then, statistically, it is reasonable to suppose that the opinion of this stakeholder group is that of the wider community. In short, the Applicant espouses their commitment to community engagement, but dismisses the concerns raised during the process due to poor attendance, then refuses to engage in further consultation even though numerous community members advised the timing was inconvenient and the consultant advised that a future meeting would be held. This is not the definition of “engagement” as stipulated in “*Undertaking Engagement Guideline for State Significant Projects*”, and, clearly, that the Applicant has failed to adhere to the requirements as set out in said guidance document.

I also find it objectionable that there is no reference to “Zone of Affection” within any of the documentation, and no allowance for land acquisition and subsequent dislocation compensation for impacted neighbours. This is further evidence that the Applicant has simply disregarded the concerns of surrounding residents and the potential negative impacts that this project poses.

2. Economic

The documentation submitted espouses the economic benefits this project, boasting in Appendix T – Economic that the project “broadly-based positive economic implications for the state and its people”. Where is the evidence to support such a statement? By their own admission, as stated in Appendix T, employees will not be sourced from the local area:

“As is noted in Section 3.1.9, in practice, the proposed quarry site is located near to major economic centres. As such, it is likely that a substantial amount of its employment and commercial activity will take place in the surrounding regions, as distinct from the areas immediate to the site.”

In relation to traffic, the Applicant has determined that by paying the mandatory heavy vehicle contribution, then the impact of increased traffic and pavement damage has been offset. This is far from satisfactory, especially as it is the only “local” economic positive identified. There is no economic gain locally in terms of employment, no intention of engaging local contractors for the initial development works, supporting the communities concern that there will be no benefit for the local community.

Appendix W – Estimated Development Cost (REDACTED) calculates the development will cost \$39,000,000. However, the estimate failed to allow for land acquisition and dislocation compensation for impacted residents in the Zone of Affection. Given that land acquisition and dislocation costs could be significant, it would be negligent for the Department to approve this development based on the cost estimates in this submission.

3. Traffic

An estimated 136 heavy-vehicle return trips per day will accelerate pavement deterioration along The Bucketts Way. It will also have a significant negative impact on the flow of traffic at the intersection of The Bucketts Way and the A1 Pacific Highway, especially at peak holiday times, such as Easter and Christmas. With Boral a part of the Barrington Coast, we do experience seasonal increased traffic volumes. Traffic surveys should have been conducted during both peak and off-peak seasons to provide an accurate evaluation of traffic volumes, rather than skewing the data by only undertaking surveys during off-peak times. Unlike this development, our local area benefits directly from the revenue tourism provides.

The Bucketts Way intersection is already treacherous to navigate, so the addition of another 272 heavy vehicles movements six days per week will cause further traffic delays and increase the risk of vehicle collisions. Add to that the impact that heavy vehicles associated with the approval of the Deep Creek Quarry, Limeburners Creek, and the expansion of Karuah Hard Rock Quarry, Karuah, will have on traffic volumes at the intersection. Additionally, Stone Ridge Quarry, Balickera, was granted approval based on a Traffic Management Plan (TMP) that directs outbound traffic north out of Italia Road onto the A1 Pacific Highway, travelling past The Bucketts Way intersection to the Tarean Road Interchange at Karuah to turn around travel south. The combination of Stone Ridge Quarry outbound traffic and Karuah Hard Rock Quarry inbound traffic both travelling on the A1 Pacific Highway will add significant volume to the northbound traffic flow, making exiting The Bucketts Way more difficult, and contributing to traffic delays. As Appendix L – Traffic states, “there is a requirement to consider cumulative traffic impacts generated by other development”, as such, the Traffic & Parking Impact Assessment is antiquated and requires updating to reflect the real this development will have on traffic in conjunction with the Stone Ridge Quarry and Karuah Hard Rock Quarry developments.

The EIS and Traffic & Parking Impact Assessment repeatedly states that there is “an alternative route that has been proposed to ameliorate any externalised impacts of the subject development upon this intersection in the future”, however, the details of such proposal have not been provided. How can such a statement be included without supporting documentation?

In relation to the calculation of truck movements, how can Boral require an average of 224 one-way daily movements to remove 700,000 – 800,000 tonnes of material per year, yet the Hillview Quarry project can essentially remove double the material (1,500,000 million tonnes per annum) with 60% less truck movements (136 truck movements as opposed to Boral’s average of 224 daily movements)? (Information sourced from *Seaham Quarry Traffic Fact Sheet* available from <https://www.boral.com.au/locations/boral-quarries-seaham-balickera>).

The EIS says that “the primary transport route will comprise Maytoms Lane, The Bucketts Way and the Pacific Highway”, however, it fails to detail what any other alternate transport routes are. Are there alternate routes? Have they been adequately assessed and evaluated? Will they be available for the community to review?

In relation to the Maytoms Lane intersection, Appendix L – Traffic (Final) states that visibility of 222m – 248m is required and refers to Annexure F: Sight Line Assessment. Annexure F: Sight Line Assessments contains no real information – no measurements, and no confirmation that visibility requirements will be met. How was it determined that “there is

no requirement to remove trees within the verge along The Bucketts Way”? How does Annexure F validate that claim?

Further, there is a lack of evidence that demonstrates any consideration for alternative transportation methods. Rail transport, a lower-impact option, was dismissed without comparative analysis, despite an established railway corridor at Stroud Road that, up until recently, was utilised to service the coal mines at Stratford and Duralie. This omission by the Applicant indicates a failure to pursue the least-disruptive means of material haulage.

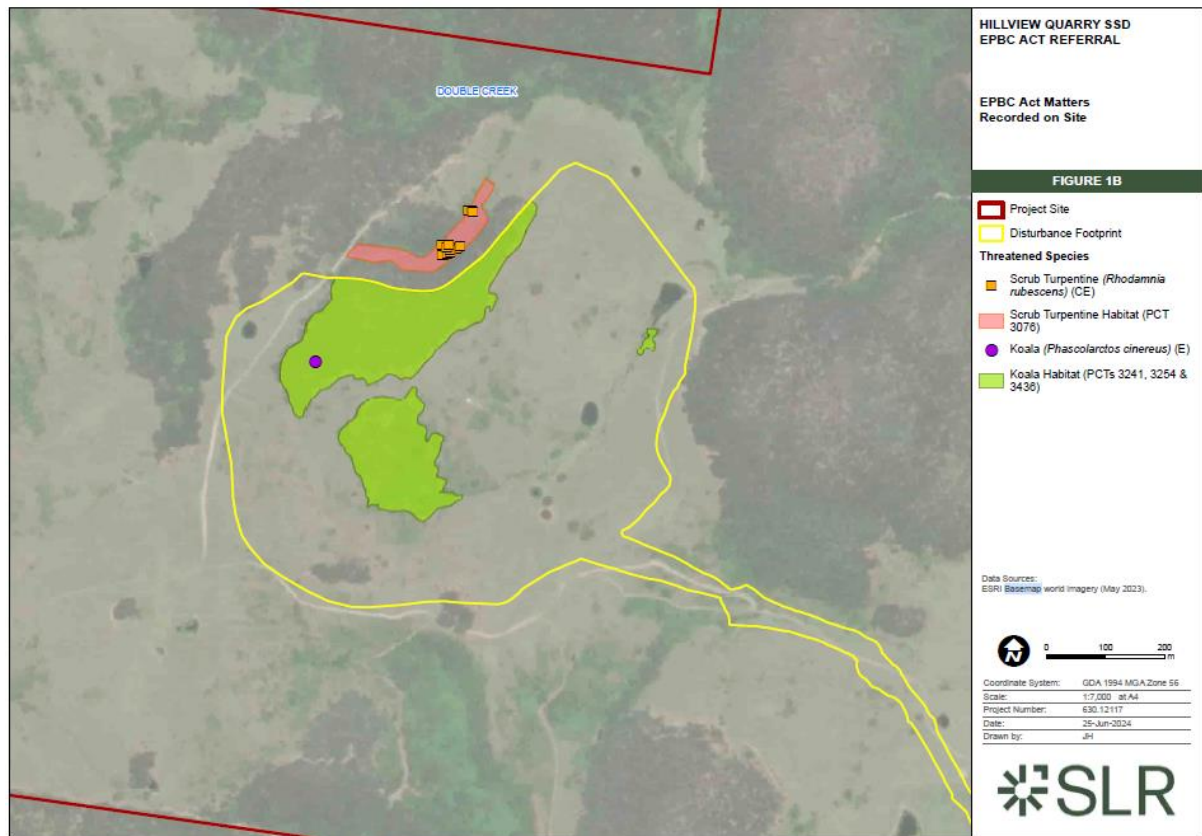
4. Environmental/habitat destruction

Maytoms Lane is a known Koala corridor, supported by the detection of Koala's during spotlight surveys as part of the Biodiversity Development Assessment Report (BDAR), undertaken 5-7 years ago. As noted in the EIS and BDAR, the Koala is recognised a “Endangered”. Disregard for the Koala habitat identified on this project goes against the State Government's Koala Strategy (\$107.1 million over five years to mitigate impacts from habitat loss) and MidCoast Council's Living Carbon Grants program (funded by the NSW Koala Strategy). These strategies are designed to protect and restore koala habitats in the hope of doubling Koala numbers, with MidCoast Council the only Council offering landholders grants of up to \$200,000 to restore habitat for Koalas and other threatened species (<https://www.environment.nsw.gov.au/topics/animals-and-plants/nsw-koala-country/nsw-koala-strategy/koala-habitat-conservation-koala-country>). These initiatives are at odds with the EIS assessment that “the habitats to be removed for the Koala and other listed threatened species that could potentially occur are not considered to be important to the long-term survival of the species”, and as such, another BDAR should be undertaken in alignment with the NSW Koala Strategy.

Further, the BDAR identified that threatened fauna “could utilise forest corridors in eastern part of site and could be at risk of vehicle strikes on haul road during quarry operation”. The BDAR proposed the following to mitigate the risk to threatened species, including Koala:

- Design culvert for haul road crossing of Double Creek to allow ground fauna movement (e.g. Koalas) through culvert
- Speed limits and Go Slow zones along haul road to minimise risk of vehicle strike within potential fauna movement corridors
- Install temporary fencing along haul road during site establishment to minimise the risk of vehicle strikes.
- Koala exclusion (floppy top) fencing.

All this information failed to be included in the EIS, replaced, instead, with “the habitats to be removed for the Koala and other listed threatened species that could potentially occur are not considered to be important to the long-term survival of these species”, in direct contradiction of the State Government's NSW Koala Strategy. Additionally, the Koala habitat takes up a significant proportion of the “Disturbance Footprint” as per the below map sourced from the BDAR. Disappointingly, the BDAR fails to identify if any monitoring for fauna was undertaken on Maytoms Lane, where considerable tree clearing is proposed to allow for the widening of the access road.



5. Justification of Demand

The Applicant has been undertaking exploratory drilling (initially without DA approval) since 2015, and, some ten years later, missed the initial deadline for EIS submission.

Given the lack of urgency around completing the approval process in a timely manner, it is evident that the market demand for materials is not as dramatic as the Applicant suggests. Further, the future demand for materials as mentioned in the EIS is vague and lacks any evidence to support that such a demand exists.

With the approval of two new hard rock quarries to the south of this site, that are better located, the demand for the Hillview Quarry development is unjustified.

6. Noise

The data contained within Appendix G – Noise is incorrect. The modelling is based on “126 truckloads per day”, rather than the actual 136 truck movements detailed in the EIS and other supporting documentation. Yet, further in the document (Sections 6.1.6 – 6.1.8 the “Extraction and Processing” stages) the document references 25 “Truck & Dog” movements per hour – which would be 275 movements over the 11-hour material haulage period.

The noise modelling included in the report allows for current and forecast traffic volumes, however, and most importantly, it does not allow for the increase in noise relating to accelerating and decelerating traffic entering and exiting the Maytoms Lane intersection. The increased vehicle numbers is significant, however, the element that will negatively impact the residents surrounding Maytoms Lane is the sound of truck air brakes slowing down from 90 km/h to take the 90 degree left-hand turn into Maytoms Lane, and the noise generated by a laden truck and dog going from 0 km/hr to completing a 90 degree right hand turn while entering a 90 km/hr speed zone. The noise generated by a decelerating truck and

dog can be between 80 dB and 101.5 dB, depending on the braking system. The length of the acceleration/deceleration zone south of Maytoms Lane exposes residents near the intersection to noise levels far exceeding those detailed in Appendix G. I note that, for my property (R9), road traffic noise levels already exceed the noise criteria, so the introduction of an operational intersection at Maytoms Lane and the subsequent of braking and accelerating of some 272 heavy vehicles will increase those noise levels exponentially.

7. Dust

According to WorkSafe Victoria “exposure to crystalline silica can occur during common quarrying tasks where dust is generated” (<https://www.worksafe.vic.gov.au/dust-containing-crystalline-silica-extractive-industry>). Given that the primary material to be extracted in the Hillview Quarry project is Rhyolite, known for its high silica content, it is inexcusable that this application fails to mention the presence of silica or provide any processes to minimise the community’s exposure to silica dust. Crystalline silica is most dangerous to health when dust is generated, becomes airborne and is then inhaled. Silica dust can penetrate deep into the lungs where they can cause irreversible lung damage.

(<https://www.safeworkaustralia.gov.au/safety-topic/hazards/crystalline-silica-and-silicosis>).

In 2023, a Boral quarry in Victoria was fined \$180,000 for failing to protect workers from exposure to dust. This event was observed by WorkSafe inspectors in September 2019 – so this is not a new hazard for the quarry industry, and clearly should have been included in the Hillview Quarry submission (<https://www.worksafe.vic.gov.au/news/2023-05/quarry-fined-180000-over-silica-dust-exposure>).

This project has the potential to create significant levels of dust, potentially containing silica, that could contaminate the drinking water of surrounding properties. This could have detrimental health impacts on people, livestock and native fauna.

I believe the submission fails to mitigate the risks to the community, the native flora and fauna, and to the greater environment (via noise, air, traffic and water pollution). There is a clear lack of evidence showing that there is a demand for the materials proposed to be produced, meanwhile, showing a complete disregard for the impact the development will have on the health and wellbeing of surrounding residents and the environment. It is my belief that the EIS and supporting documents are incomprehensive, and not of a standard that a development of this type requires. The omission of a Zone of Affection, the absence of a land acquisition and dislocation compensation plan, the lack of community consultation, and the failure to acknowledge the presence and subsequent danger of silica dust are just four examples how this submission fails to comply with the requirements of a State Significant Development. I am sure the Panel will agree that this application cannot be approved in its current form.

Due to the catastrophic impact this development will have on every aspect of my life, I reserve the right to supplement this submission in the coming weeks as more information becomes available to me.

Regards,

Dayanna Finch