

9 September 2025

To whom it may concern

Re: DA 1-01-2001 Modification 3 Quarry Continuation and Stockpile Area Extension

Timeline of applications

It's unclear to me how this application can go ahead given the dates of operation have since expired.

As outlined in the Executive Summary of the Modification Report by Irwin Environmental Management, the quarry was originally approved on 28 March 2001 for a 20-year period to 28 March 2021. A modification application (MOD 1) was submitted in 2020 and subsequently withdrawn. A 1-year extension with modifications (MOD 2) was sought and approved through to 2 November 2023. That extension expired almost 2 years ago.

Why are we here now reviewing a third modification application? The time has passed, this should have ended on 2 November 2023. How clear is the applicant on their business direction and ability to implement their proposed model? How do we know there isn't going to be another modification with expansion of the business and for another extended period of time? Once the door is opened for this and expiration dates continue to be ignored – who knows where this may land.

Assessment of impacts / Justification for modification

The Modification Report Executive Summary states:

- 'there will be no detrimental impact on local traffic conditions, with the community to benefit from a proposed upgrade to Collector Road', and
- that '[the quarry] previously operated without significant adverse impacts on local biophysical and socio-economic environment'

The area has changed a lot since the quarry last operated so a blanket comparison can't be made on the impacts. The Collector Road has seen no improvements for the last 25 years, only very rudimentary maintenance. The traffic numbers and resident numbers have increased. There is also a new (since the last instance of the quarry) residence established diagonally across the from the entrance to the quarry on the south side of Collector Road.

The Modification submission itself is also *not the same* as previous quarry operations so a straight out 'no impact' comment is unreasonable. The Modification Report includes the following changes:

- An increase in the total area of disturbance more than 3 times the original proposal!
- An extension on blasting times of an additional 15 hours per week (with no substantial reason given as to why this extension is required for business purposes).
- Change from operations unable to commence 'until the road is upgraded' to 'a voluntary planning agreement is in place'
 - Suggesting that once an agreement has been signed operations can start regardless of the current state of the road. This is extremely unfair to motorists.

The Modification Report (6.8.3) describes the road condition as: 'the road pavement and general condition [is] in poor to moderate condition. Notwithstanding the Quarry has not operated since 2008 and has therefore made little contribution to this condition'.

This last statement is untrue. The quarry trucks up to 2008 helped put the portion of Collector Road from the Federal Highway to the Quarry entrance in the condition it's in. The ongoing laden heavy vehicle traffic damaged the condition of the road, which has then broken apart with rain and the low maintenance invested by Council. If you look at the section of Collector Road after the Quarry and towards Lucky Pass Road, you can see it's in much better condition. This is the condition the entire Collector Road leading from the highway used to be in – before the quarry ever opened.

Upper Lachlan Shire Council (ULSC) even comment that 'ULSC as a small Council has limited funds for major roadworks/upgrades' (Modification Report, 5.2.2 Local Government Consultation). Evidence of this is seen in the current condition of the road. Ongoing investment into maintaining the road will continue to be a problem.

Traffic impacts

I live on Lucky Pass Road and lived here when the quarry was open previously, so my perspective comes from experience and as an impacted resident. I have concerns about road safety and road maintenance, focusing on traffic to and from the quarry and the state of the road between the Federal Highway and the Quarry entry.

Quality of documentation

The Summary of the Traffic Impact Assessment by Irwin Environmental Management is inconsistent with other details in the documentation, describing 'additional traffic generated by the quarry of less than 10 vehicles per hour' and references a '10-year planning horizon'. The Modification Report refers to 20 laden movements per hour and a 15-year timeline. Given the Traffic Impact Assessment also references Monaro Highway in places rather than the Federal Highway, can much value be placed on it? The summary suggests recommendations are being made on incorrect data.

Measure of impacts

The primary measure of traffic impact in the documentation provided is reported road accidents. This doesn't reflect near misses and greater stress levels of a) travelling the road every day with increased traffic made up of laden heavy vehicles and b) the disruption to our quiet and peaceful lifestyle.

The Modification Report considers "impacts associated with the Quarry are anticipated to be very minor given the small proportion of traffic to be contributed".

Vehicle movements of 134 **laden** vehicle movements per day and 20 **laden** vehicle movements per hour is a lot for a narrow, unmaintained road where sedans and family vehicles would be meeting large quarry trucks travelling at speed, even if that speed is within the limit.

The Modification Report (6.8.2.1 Local roads and access) also states that: 'There is no sign-posted speed limit on Collector Road which is configured as a sealed two-lane carriageway with 3.5m lane and no sealed shoulder provided for each direction.' Basic internet research shows the average width of a small SUV is 1.8m, with the quarry trucks measuring *at least* this width, the end result is a very unsafe road experience (total: a minimum of 3.6m of vehicle widths plus

a safety gap between on a 3.5m road with no shoulder). The scenario is 1 small SUV facing a string of quarry trucks while navigating the bend approaching the quarry (where vehicles often drive to the middle of the road due to poor road conditions) and the stretch of pot-holed road to the highway. You may say that the trucks won't always be together in a string. From my experience, the trucks queue at the 'no trucks past before 7am' sign just off the Federal Highway, reaching right back to and onto the Federal Highway and then all move off together the moment the clock ticks over 7am. Add kangaroos and winter fog to that equation and the stress levels for drivers in smaller vehicles increases substantially. From memory, for the rest of the day a driver could easily meet 5 trucks give or take between the quarry and the highway.

The addition of laden vehicles in both directions means more weight and damaged is being imposed on the road. In the context of 'impacts associated with the Quarry are anticipated to be minor...', reference is made (Modification Report, 2.3.3) to the waste transfer station located 400m from the Federal Highway presumably as a point of comparison of other facilities on the same road. However, the waste transfer facility has a heavy vehicle entering with a frequency of less than once a week. This is hardly a comparison to 804 (6 x 134) movements per week proposed by the Quarry.

Road maintenance

The Voluntary Planning Agreement between the applicant and ULSC includes the key components of 'works to be completed within 24 months' while allowing 70 laden truck movements per day/10 truck movements per hour (50% of the proposed total).

In 5.2.2 Local Government Consultation (Modification Report), ULSC 'Feels community would question allocation of funds on a road to support private development'. In line with this thinking, why does the community need to tolerate lifestyle disruption caused by up to 24 months of roadworks to support a single private development?

Having a plan is one thing – seeing it in action is another. Having a traffic plan or even a one-off upgrade plan doesn't mean a) an outcome, or b) ongoing action and maintenance. The road has had little maintenance over the years and in ULSC's own words they have little budget for such maintenance – including following through on addressing the impact on the road from the quarry's previous iteration.

Social and Rural Values

As per the Modification Report 6.11.3.2, the Queanbeyan-Palerang 'Towards 2040' Local Strategic Planning Statement (LSPS) (QPRC, 2020) outlines a vision of

- The rural residential areas will continue to provide a high quality rural living environment for residents.
- The environmental and rural values of these locations will continue to be their core distinguishing features, and these qualities will be maintained in the future.
- New uses that do not impact on the amenity or environmental qualities of the areas will be encouraged.
- Residents will have access to alternative forms of transport and where possible, pursue opportunities to work directly from home.

Further, the Queanbeyan-Palerang Community Strategic Plan 2042 (as per the Modification Report, 2.2.2) identifies priorities and strategies for their vision which includes 'preservation, enhancement and protection of community and environmental values'.

The proposed modification with increased blasting hours, laden trucks travelling a poorly maintained or in-the-progress-of-being-upgraded-for-24 months road up to 804 times per week does not provide a picture of *continuing* (i.e. going forward with how it is now) to provide a *high quality rural living environment*. The right to peaceful and stress-free living is a rural value of our location which the QPRC has identified as a 'core distinguishing feature' which should be preserved and maintained in the future, and new uses should not impact this.

The LSPS also seeks to encourage opportunities to work directly from home. This is another change in lifestyle in comparison to the quarry's previous operations over 17 years ago: more people are now working from home in desk-based jobs. The increased noise generated by longer blasting times and increased number of *laden* vehicles is likely to impact the working conditions of these residents.

Consequences of not proceeding

The Modification Report (7.2.5) outlines the applicant's opinion on potential consequences of not going ahead with the development. It reads more like a business plan market analysis/risk assessment for Collector Resources Pty Ltd rather than something specific as to the consequences of this particular modification not going ahead.

I'm sure there are other quarries in NSW that are already in operation and can meet industry needs.