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We understand Rocla's need to move their Administration Centre, but we have serious concerns about the following...

Impact of moving the Wash Plant (and Sand Stock Piles) needs to be addressed

The EA document says it is the "Environmental Assessment for the relocation of the Administration Centre". The title does not draw attention to the relocation of the Wash Plant. The content of the EA is confusing in this regard. The section "The Quarry Site and Extraction Stages" says that Rocla will "locate the new Wash Plant (as well as) the Administration Centre". However, the environmental effects of a new Wash Plant are not covered, and the Wash Plant is not shown in the various Figures.

Whether or not it is planned to relocate the Wash Plant, the environmental impacts of its new position, or its existing position relative to the new Administration Centre, needs to be properly addressed in the EA.

The resiting or retention of the Wash Plant is significant because Rocla claims

- on page 23 of the EA, that "the key improvement ... would be the relocation of the wash plant and mortar sand plant";
- the noise arising from the quarry does not emanate from administrative activities, but rather from the quarrying operations, the Wash Plant and vehicle movements;
- and that the resiting of the Administration Centre will reduce the noise impact on neighbouring residences (implying, based on their previous two points, that the Administration Centre includes the Wash Plant).

In effect, according to Rocla's sometimes contradictory statements in the EA, the relocation of the Administration Centre without the relocation of the Wash Plant will not achieve the stated benefit of reducing impact on neighbours.

Not mentioned in the EA is the new noise that will be generated if the Wash Plant is resited with the Administration Centre. Although the Wash Plant noise may be muffled if it is at the bottom of a pit with steep access and exit roads, there will be the added (and new) noise of the fully laden sand trucks struggling up and down the steep roads in low gear and with the need to gear up and down.

Rocla, at Rocla Community Consultation Committee meetings, previously said their plan was to move the Wash Plant to 'stage 3/1' or 'stage 3/2'. It is implied (although not specifically stated) in this EA that the Wash Plant will either be moved to 'stage 2/3', or that it will not be moved at all.

If Rocla is proposing to move the Wash Plant, the impacts of doing so need to be thoroughly addressed in the EA.

If Rocla is proposing to move the Wash Plant along with the Administration Centre to the bottom of 'stage 2/3', the impact assessment must include the noise impact, additional fuel use and additional vehicle exhaust generated by the trucks as they traverse the steep access and exit roads down the escarpment into the pit in low gear and at all hours.

If Rocla is not proposing to move the Wash Plant along with the Administration Centre (2010 AEMR) despite them identifying the Wash Plant in the EA as being the greatest source of noise impact on neighbours, why not?

The maths suggests there cannot be 5 million tonnes of materials left in stages 3/4 and 3/5

In the section "Project Life:" Rocla says that they have "five million tonnes of product left in Cell 3" thus justifying the need to build a larger Administration Centre. However, in 2005 they only had 5.8 million tonnes available. 'Stage 3/3' (previously approved as 'stage 2' which was exhausted by 2004) and 'stage 3/1' and 'stage 3/2' are now finished, and 'stage 3/6' is two thirds complete.

There cannot be 5 million tonnes of material left in just 'stage 3/4' and 'stage 3/5' as this would mean that only 800 thousand tonnes had been removed to date, which is obviously not the case.

Insufficient justification for expanding the Administration Centre

Unless Rocla is including production from the as yet not approved extension, there does not appear to be sufficient future volume to justify the need for a vastly expanded Administration Centre.

Existing facilities have been sufficient for Rocla's operations since 2002. Although Rocla has been running at around 50% capacity for some time, the existing Administration Centre was designed to cope with the full capacity production of 400,000 tonnes per year.

If production volumes are not planned to increase above those originally anticipated, why does Rocla need to increase its environmental 'footprint' and, therefore, its environmental impact? One reads into this an anticipation of increased volume output. However, this is not possible as the sand resource of the existing operations is finite (and, as articulated in our previous paragraph, almost certainly vastly overstated at 5 million tonnes).

The community is unclear as to why, even though there may be a legitimate need to *relocate* the Administration Centre, Rocla is also applying to expand its facilities so dramatically (e.g. 40 space parking area, showers, more toilets, increased building area with larger staff room and the consequential increased roof run-off, etc.)

Impact of new roads needs to be addressed

The Proposed Administration Centre is described as "office, amenities, light vehicle car park, storage shed and related facilities and infrastructure".

No mention is made of parking or waiting areas for large trucks.

Most importantly, the road system (for road trucks, internal haulage and movement of heavy machinery, as well as the afore mentioned "light vehicles") should be specifically included as the surface area disrupted for the road system far exceeds the surface area disrupted for the buildings and car park (see Rocla's Figure 2.1) so is obviously significant.

The resiting of the Administration Centre requires new roads that will, according to the EA, not only carry "light vehicles", but will also carry "road-registered product trucks ... earthmoving equipment and internal haulage".

To state that “the formation of the internal roads usually involves a bulldozer simply pushing a new route to the required area” ignores the impacts of creating the roads, the roads themselves, and the vehicular traffic on these roads.

Although there is quite extensive ‘conversation’ about roads in the EA, this does not tackle any of the key potential environmental impacts.

Change in traffic movements

Aside from the physical impact of the roads themselves, the noise and visual impact on surrounding residences and businesses must also be assessed.

Aboriginal cultural impacts

Have all the impacted areas been subject to Aboriginal cultural assessment satisfactory to Darkinjung Land Council? Although most of the areas that will be affected have already been topographically changed, are there any remaining areas (however small) that may have cultural significance?

Defer approval until after Sewage and Waste Disposal approval obtained from Council

The Administration Centre obviously cannot go ahead without an acceptable sewage and waste disposal solution, so approval for the latter should be required before approval is given for the overall relocation.

This is particularly important as Rocla is not replacing ‘like with like’ when it comes to sewage and waste production and disposal, so there will have to be extensive due diligence in the process of assessing the new Administration Centre for approval, and it cannot be assumed that approval will be given.

With the addition of showers and an increase in the number of toilets and the larger lunch room and the new training facilities, all planned to cater for a greater number of personnel and visitors, not to mention the increased roof area, the sewage and waste volumes from the expanded Administration Centre will exceed current volumes.

Considering the topography of the excavated quarry floor where the sewage and waste will be produced, at an elevation many meters below the level of the surrounding land, their discharge and disposal (at the bottom of this ‘pit’) should be of particular concern.

The risk of flood or excess water occurrence is almost inevitable in the light of Rocla having experienced a number of excessive surface water events over recent years due to heavy rainfall and runoff.

Not only does surface water from the cut sides of the quarry pit seep through the walls into the pit even in normal conditions, but excessive rain water (a common occurrence in Calga) will flow directly into, and will collect in, the pit where it will almost certainly compromise sewage and waste disposal.

The potential for flooding of the new facilities in the pit is far higher than the potential for flooding of the existing facilities which are at ground level, making contamination of surface, ground, aquifer and stream water highly likely. The risk of contamination of the drinking water of residences downstream of the quarry is not only high, but the effects would be devastating. Considering the aquifer has already almost certainly been fractured by quarrying activity, it is also possible that any overflow of sewage would find its way into the aquifer which even further reaching consequences.

Demolition and construction noise impacts

The statement “The existing ambient noise levels would not be expected to change during the construction of the Administration Centre” (including the new road system) is not reassuring. Even if true (which we dispute), ambient noise levels do not reflect the actual experience of noise by neighbours.

The noise of the existing quarry operations is already causing ongoing disturbance to the residence and business south of the quarry. Any construction or demolition work in the vicinity of the existing quarrying activity will clearly increase the noise impact on neighbours south of the quarry where noise levels are already at times at unacceptable levels.

Rehabilitation of the quarry site

Rocla is currently having difficulty rehabilitating areas of the quarry in accordance with their existing Rehabilitation and Landscape Management Plan. One would expect, in the light of this, that the EA for the new Administration Centre would need to do more than state that rehabilitation “would be consistent with the RLMP” and that “buildings and related structures would be removed and the area revegetated as shown in the RLMP” when compliance with the RLMP, before this change is even made, is already proving problematic.

As an example, the 2004 EA requires certain areas still in excavated state should have already been fully rehabilitated, and even those areas that are being rehabilitated are proving difficult to plant as the flora prescribed in the EA won’t grow in the changed conditions brought about by the quarrying activity.

Noise impacts once the Administration Centre has been resited

Rocla’s commitment that “compliance monitoring would continue ... in accordance with Condition 3(7) of the Development Consent” is not reassuring to the community.

The statement that the “relocation should significantly reduce the opportunity for neighbours to distinguish project-related noise from the background noise on Peats Ridge Road and the F3 Freeway” is a furphy. Just because the neighbours are unsure which direction the noise is coming from, does not mean that the noise impact of the quarry will not increase.

Most importantly, traffic noise on the new road system (as discussed in previous sections) will add to the noise levels.

Visibility

Rocla has not been clear as to whether the new road system and the traffic thereon will be visible to Peats Ridge Road and/or the neighbouring Walkabout Park (note the area labelled “S – CJBarnard” on Rocla’s Figure 3.1 is actually part of Australia Walkabout Wildlife Park and is adjacent to the proposed new road system).

Air Quality

The reference here appears to relate to air quality affecting neighbouring properties and, in this context, appears reasonable. However, no statement has been made as to the assessment of dust impacts on Rocla personnel. Would the topography effects concentrate dust levels in ‘the pit’? Additional monitoring with a remedial plan should be considered for this unknown OH&S impact.

Hazards and Public Safety and Site Security

Security will be worse if all buildings are at the bottom of a ‘pit’ remote from the quarrying activities which continue along Peats Ridge Road. It will be far easier for anyone to access the actual excavation sites from Peats Ridge Road without being seen by personnel in the new Administration Centre at the distant end of the quarry and below ground level.

Rocla's "Evaluation and Justification of the Proposed Administration Centre"

For the reasons given above, the community is concerned that insufficient work has been done to support Rocla's claim "it is assessed that the administration centre, as presented in this Environmental Assessment, could be relocated and operated in a manner that would satisfy all relevant statutory goals and criteria and environmental objectives."

The community is also concerned that the stated justifications (security, centralisation and impact on neighbours) do not necessitate, and in the most case will not be achieved, by resiting the Administration Centre or by expanding the facilities.

As previously discussed, security will be decreased and the noise and visual impacts, although changed, will impact neighbours albeit possibly different neighbours. Also, the current facilities are already centralised so resiting, or expanding, the Administration Centre will not make a difference.

The community does accept (although this, surprisingly, was not claimed by Rocla as the primary reason for relocation) that there may be justification for resiting the Administration Centre so that the area it currently occupies can be put to better use.

The community cannot see any justification for making the new Administration Centre larger than the one it is replacing, with the commensurate increased impact on the environment and neighbours.

The community questions whether the choice of site for the new Administration Centre is appropriate considering the complications of sewage and waste disposal, potential for water contamination, increased noise from the new and extensive road system, and the noise of the trucks traversing the steep incline to the new Administration Centre.

Non-compliance of existing operations

Rocla has failed to demonstrate that they can comply with their current conditions of consent on a number of fronts. Most notably their ongoing and persistent use of water in excess of NOW's assessment of their allocation and usage (which we believe is currently being investigated) and their failure even today to have all necessary licenses and permits, despite their 2005 Conditions of Consent requiring that they have these in place *prior to work commencing*.

This being the case, we question whether Rocla should be allowed to make any changes to their existing operations until they can demonstrate that they are able to, and prepared to, comply with (to quote Rocla) "all relevant statutory goals".

We assume that the Department of Planning will take the advice of other departments, including NOW, into account in their assessment of this application.

Operations not State Significant

When Rocla applied to commence the current operations in 2004 they stated that this quarry is absolutely necessary to keep up with Sydney's demand for sand. This appears to be a gross exaggeration. Producing an average of 200,000 tonnes of sand per year over 7/8 years, this caters to only 3% of Sydney's needs.

On this basis, we question whether this application should be assessed by the Planning Department, or should rather be referred in its entirety to Gosford City Council.

Thank you for your consideration of our concerns.

Yours Sincerely,
Adrienne Ausburn
Chairman
CPR Community Group Inc.