

Ardmore Park Quarry Modification (MP 07-0155 Mod2)

Submission by Moira McGinity, 1 King St., Bungonia 2580

I object to this application to modify the original project on the following grounds

1. It would result in a radical transformation of the approved project
2. It is inconsistent with the original approval
3. There has been no Community Consultation as required by the Director General's Requirements and no demonstration that effective consultation has occurred.
4. The conditions of consent to the development of the quarry apply to before and during operation of the quarry. No indication is given as to how the Proponent is going to develop and maintain the quarry without use of the Designated Haul Route.
5. Only one relevant traffic count. None on the southern end of Oallen Ford Road, Windellama Road or Golden Grove road.
6. Poor Justification . The proposed route **is a longer not shorter distance** from Goulburn than the designated haul route. It is hard to justify developing another local quarry given the number of quarries already operating with access to major roads and closer to potential customers.
7. Adverse social impacts and traffic hazards.
8. Product trucks and heavy vehicles associated with servicing the quarry are not permitted to use King St. Predictions do not include service vehicles use of Windellama and Oallen Ford Roads

The following is an expansion of the above points:

1. The approved project was treated as of State Significance with designated haul route and delivery of 400,000tpa of sand and basalt products annually over 30 years. The modification application would allow for 20,000 tpa of quarry products to customers within the Goulburn Mulwaree Council Area and sub-contractors working on Gullen Range wind farm using roads other than the designated haul route. This is sometimes called the local area in the documentation which could be interpreted as including places outside GMC Council area. The population of the Council area is 28,628 compared with over 4million in the Sydney area which was the original target customer. "Modification" is defined in the Macquarie Dictionary as "partial alteration" A local quarry is so radically different from the original project that it can not be considered a modification. Because the roads, now proposed as being suitable, were considered unsuitable in the original DA and they were not covered by any of the documentation. For example the Traffic Management Plan does not mention Windellama Road.
2. This project is also inconsistent with the original State Significant Project approved in 2009. The EIS accompanying this DA stated that the Windellama and Tarago destinations were not an option. Also Mountain Ash Road was unsuitable yet Figure 2 on page A3-17 includes Mountain Ash Road in the Project transport route. The Proponent wants to change the project to a local quarry and, as such, is a matter for the local Council and a new DA with detailed road profiles and traffic counts that truly reflects current conditions. How can predictions be accurate, as claimed, unless present traffic numbers are established.. It is not a modification under Sec.75W
3. The communities most affected by this modification have not been consulted or notified. No public meetings were arranged by the Proponent. At a meeting in the Bungonia Community Hall to discuss a proposal to reduce the roadworks on Jerrara Rd, that Jason and Steve Mikosic

attended, the Proponent stated that he had not prepared his talk, as he had expected to speak to a few members of the Bungonia Progress Association not the 50 people present. After 4 years he was not prepared! **Absolutely no mention was made of the present proposal by Jason Mikosic** The meeting became heated when questions were not answered adequately and Jason and Steve Mikosic stormed out. At an earlier public meeting Steve Mikosic had berated a member of the Community Consultative Committee for notifying the community of a proposal discussed at their meeting. (The Progress meetings are recorded with the permission of the meeting) Jason Mikosic sent an Email (copy attached) complaining that the Bungonia Times had published details of a proposal that had been discussed at a Community Consultative Committee. We understood that the function of the Committee members was to liaise between Multiquip Quarries and the community. There are two local papers with a wide distribution along the roads affected by this proposal which the Proponent could have used to notify people. There is also the Windellama Progress Association as a contact. Very few of those along the affected roads go into Johnno's Store. One can only assume that the Proponent didn't want residents to know about the modification. **The letter published in the Windellama News was provided by the Bungonia Times Committee not Jason Mikosic**

4. One of the conditions of consent is **“No project related heavy vehicles shall use King Street to get to or from the site...” Paragraph 29 page 11 under Road Haulage.** Until the by-pass is constructed this means heavy vehicles servicing the quarry would have to use Windellama & Oallen Ford Roads and no consideration has been given to these vehicles in the predictions. Under Traffic and Transport Upgrades paragraph 25 (a) “The Proponent shall restrict all product transport from the site until it has completed the Stage 1 road upgrade works to the satisfaction of the Council” The so called modification does not comply with this condition.
5. Justification: There are at least 7 sources of quarry products in the area including a large stock pile of materials on Bungonia Road, Goulburn which the proposed Ardmore Park transport route would pass before crossing Mundy Street Bridge to get to Goulburn.. Page 24 para. 5.5.2 of the Environmental Assessment claims “a positive socio-economic effect would be providing locally produced products to customers, **costs to customers would be reduced as a result of reduced distances**” There are 22,429 people in Goulburn who have access to two Goulburn based suppliers of quarry products and 6,199 outside the urban boundary who, except for a small number, are also closer to other suppliers. **The statement in the Environmental Assessment is wrong. In fact the proposed route is longer than the designated haul route.** As for job creation this just an assertion without any facts or figures. Are these jobs additional to those claimed in the original DA? Or is this just a throw away motherhood statement?
6. **Thr Traffic Counts:** It was admitted that the equipment used in the 2006 traffic count on Oallen Ford Road was faulty, yet the figures are used in this report. There is no count for the southern end of Oallen Ford Road, closer to the junction with Windellama Road and none at all for Windellama & Brisbane Grove Roads. The latter is a heavy vehicle by-pass but it is not lined, is poor condition and not wide.
7. **Socio-economic impacts and the public interest:** There is no detailed analysis of the use of the roads or the number of residents or traffic counts on Windellama Road yet it is claimed that any local amenity impacts would be minimal. The first DA submitted by CEAL trading as Multiquip Quarries proposed to use as a haul route for heavy vehicles unimproved Oallen Ford Road, King Street and Jerrara Roads, maintaining that they were suitable for such traffic and would not create a traffic hazard. The Minister for Planning, Goulburn Mulwaree Council and the local residents did not agree. The Company submitted an other DA and this was also refused. An appeal against the Minister's decision to the Land and Environment Court was not upheld. A revised DA was approved in 2009 by the Minister with conditions of consent requiring amongst other things road upgrades and a by-pass around the village of Bungonia.

The Proponent now wants us to trust their judgement that Oallen Ford Road south of the Quarry site and Windellama Roads are suitable as a haul route. **See page A2-5 in the Environmental Assessment Mr. Steve Mikosic “conceded that the amount of material could increase as Multiquip was supplying material to sub-contractors working on the Gullen Range windfarm, Kialla Road”** So much for local driveways. Both roads are linked to Route 92 to the South Coast and carry a lot of tourist traffic during school holidays and long week-ends. Braidwood Road passes the Showground with horses crossing from the stables, and regular events with pedestrian traffic. Given the almost non existence of a justification, the adverse social impacts and the traffic hazards created by putting more heavy vehicles on rural roads, especially those used by school busses, far outweigh any perceived economic benefits and it is difficult to see any economic benefits, except to Multiquip Quarries. The modification would allow a development that is not in the public interest

Conclusion: The Ardmore Park Quarry's designated haul route gives access to the Goulburn and Canberra markets as well as Sydney and is shorter than that proposed in the modification. CEAL trading as Multiquip Quarries appear reluctant to commit to building the by-pass and doing the roadworks required by the Conditions of Consent. This was shown by a proposal to construct the by-pass and minimal roadworks and then begin transporting quarry products. The application was withdrawn and the present application to use a different haul route to reach the Hume Highway, under the guise of supplying local customers, was submitted. The Environmental Assessment does not deal adequately with the road conditions: Where are the traffic counts for Windellama Road which is more than half the haul route?

This modification is inconsistent with the original project, it requires additional Environmental Assessment, its not covered by the mandatory plans eg. Traffic Management Plan and therefore is outside the scope of Sect75W.

It's not in the public interest and should be denied.