

Dubbo Zirconia Project ('DZP')

Application No: SSD-5251

As a resident of Dubbo for almost fifty years, I wish to object to the above proposed development on the following grounds:

1) Traffic: such a massive-scale development will generate an unacceptable daily traffic volume, particularly of heavy vehicle movements and particularly between the mine and the railhead on the other side of Dubbo, but there appears to be insufficient provision in the Proposal for securely and adequately funding the complete route between these two points, as well as all the other roads impacted during construction and the life of the mine's proposed and projected operation.

As Alkane clearly intends road rather than rail to be used for at least the first five years of operation, and probably considerably longer (6-35 footnote), this has the potential to cause long-term detrimental social and infrastructural problems on the Dubbo community, as I have personally seen occur in areas such as Picton and Singleton.

Traffic conflict, with potential for elevated accident rates, as well as associated noise and pollution will greatly diminish the amenity and character of Dubbo for both residents and visitors alike.

There is obviously particular concern for its effect on the visitation and viability of Taronga Western Plains Zoo, Dubbo's iconic tourist attraction, the one attribute for which Dubbo is widely recognized.

Not only is access to TWPZ very close to the Obley Road-Newell Highway junction, and already giving cause for concern for traffic congestion and conflict at peak periods, but the 'back road' tourist drive to it along the Obley Road through to Molong will patently NOT be a pleasant rural experience for visitors 'going bush' if mining traffic is part of the scene, which has the potential to cause a flow-on drop in visitation to Yeoval and Cumnock, the two smaller centres en route.

I have not managed to pick up in the documents any mention of Alkane's proposed contributions to road reconstruction and other associated traffic management requirements outside of those they mention (2:12.4.2) they will contribute to works they deem necessary along the Obley and Toongi Roads.

This appears to leave the stretch of the Newell Highway through Dubbo, from the Obley Rd junction to the railhead access 'in limbo' regarding funding for upgrades and maintenance, and cause for considerable concern regarding increased traffic conflict, insufficient lane-width and road-pavement strength.

There are already stretches of that part of the Highway which may be deemed to 'comply with standards' but are patently below what is actually needed, and give cause for concern.

An example of this are the parking shoulder widths which are much too narrow on either side of the stretch from the West Dubbo roundabout to Alfred Street, resulting even in parked light traffic outside the motel projecting into the inside lanes, causing traffic hazards when both lanes are occupied; even worse hazards have been precipitated by the new shopping precinct opposite, where parked trucks often protrude onto the inside lane.

I understand that 'current' RMS traffic statistics for the Dubbo area actually date from 2005, Councils working on a yardstick of one and a half percent growth per annum, developers providing their own data to include in development documentation.

On such a basis, there is no certainty that any road upgrades associated with the proposed development, whether funded by the applicant or government bodies, will be adequate to cope during construction and operation with the traffic movements on all of the approach routes to the proposed development from either side (not just the Obley –Toongi Road section) or through Dubbo itself.

2) Environmental: terms such as 'not predicted to', 'are expected to', 'unlikely to', as in the section on *Groundwater Resources 6-3, 2-5*, give me cause for concern, as they indicate that much more detailed and independent research needs to be done in not only that field but across the spectrum of environmental matters.

I am not happy to read eg in the Groundwater Resources the proviso 'Assuming no leakage from the LRSF or effective leak identification responses and remediation, no groundwater dependent ecosystems would be adversely affected.'

I am not happy to read in *Surface Water Resources 10:3.2.4* 'In all but the wettest 20 year cycle the volume of liquid residue generated by the DZP over the 20 year life of the **Proposal** could be maintained within the nominated structure.' The proponent mentions the potential for extending the life of the mine, increasing the long-term possibility of problems, particularly considering the wide fluctuations being now experienced in weather patterns, which give unpredictability to future weather predictions.

With the stated potential for the proposed operation to be extended beyond 20 years, and the possibility of an increased volume of annual extraction, the integrity of structures containing liquid residue is paramount. I am not happy to realise that the optimism of the Proponants may not be matched by the necessary immediate or long-term expertise to safely manage the DZP.

I am not convinced that there would be no long-term adverse effect on the surrounding environment itself, or on residents near the DZP or in adjacent localities such as Dubbo, through issues such as, but not restricted to, fine dust particles and noise from blasting.

Given the unique and complex nature of the Proposal, and the possibility that the next stage of development could include extraction of uranium and thorium, I consider it would be in the national interest to hold a Public Inquiry, to allow an independent panel of specialists to assess all aspects of the Proposal, including adverse social impacts, long-term implications to the environment and any matters not addressed in the Proposal.

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