



PCU078714

Department of Planning
Received
20 NOV 2019
Scanning Room

322 Paynes Road,
PO Box 727,
Dombarton,
NSW 2530

14th November 2019

Dear Sir/Madam

Re: Sancrox Quarry Expansion Project SSD 9946

For transparency, I wish to disclose that I am a landowner on a currently being developed rural subdivision to the west of this proposed new quarry, Riverpark Sancrox Estate and also a landowner of land on Le Clos Sancrox situated to the immediate south of the proposed new quarry, for which a proposal to rezone as residential is currently being considered by Port Macquarie Hastings Council.

The purpose of this submission is to protest in the strongest possible manner my opposition to the above project going ahead.

This letter will demonstrate that the EIS does not address all the potential issues, is short on many details, is guilty in my opinion of hiding facts and seeks to mislead whosoever is processing the application by misrepresentation and omissions. In addition, experience in the operations of the existing quarry, shows that Hanson cannot be trusted to adhere to its stated operating approval conditions.

By any criteria, the EIS is a half-baked document and I believe is not worth the paper it is written on. There are many notable omissions and grossly misleading statements within the EIS. Listed below are some of them, in no particular order of importance.

1. No mention is made that the project will fragment and alienate land and result in conflict with adjoining land uses. **In fact, the EIS asserts the complete opposite.** It fails to mention that fundamentally, the quarry is not ideally situated, since in every direction over the range of 300 metres to 1,300 metres, there is current or proposed residential development.
2. No mention is made of the currently being constructed 142 Lot Rural Residential sub-division being constructed to the west of the site (previously Le Clos Verdun but now called Riverpark Estate), the eastern boundary of which is only 600metres from the western edge of the new quarry pit.
3. No mention is made of the existing houses located on Le Clos Sancrox, the nearest of which is less than 1km from the edge of the proposed new quarry and the proposal currently being considered by Port Macquarie Hastings Council ("PMHC") to rezone the whole Le Clos Sancrox as residential, the closest parts of which will be approximately 300 metres from the southern edge of the proposed new quarry. Because it has not acknowledged this, it has chosen not to build a bund to attempt to shield this proposed new development from the noise and dust associated with

this new quarry although it is debatable if such a bund would prove effective anyway.

4. The project is described as an “expansion”. It most definitely is not an expansion of quarrying activity on the existing quarry footprint known as “Sancrox Quarry”. It is the commencement of quarrying activity on an adjacent site (owned by Hanson) but not currently part of Sancrox Quarry. Hanson’s proposed method of extraction from east to west allows the project to be described as an “expansion to the west”. To describe the project as an “expansion” is a complete falsehood.
5. No mention is made of the high-speed rail corridor which goes right through the middle of the deepest part of the quarry. To move that corridor would involve serious disruption to all surrounding land and land-owners
6. It does not mention that the new quarry will wipe out “high and medium use” koala habitats and that a previously identified (in 2015) endangered biological community corridor runs right through the centre of the proposed new pit. As a result, no mention has been made of how Hanson proposes to manage its removal and create alternatives.
7. No mention is made that swamp oak and mixed eucalypt open forest areas will have to be destroyed in which several hollow bearing trees are located.
8. Reading the EIS would give the impression that rock is not available close by. In fact it states that the closest quarry is 200km away. This is grossly untrue. **Rock is available close by.** The EIS fails to mention the Hanson owned land at Milligan’s Road, Herons Creek. It also fails to mention the recently approved new quarry owned by CTK NR Pty Ltd at Bago and the fact that Hanson owns a parcel of land immediately adjacent to that new quarry. It also fails to mention all the other quarries in the vicinity listed below.
 - Pacific Blue Metal, Possum Bush Rd
 - Great Lakes Aggregate, Bullocky Way, Failford
 - Holcim - Jandra Quarry
 - Boral - Johns River
 - Hy-Tec - Jambali Rd, Grants Head Bonny Hills and Yarrabee Rd
 - Coastal Quarry Products, Milligans Rd, Wauchope, for lower quality material
9. Section 1.4.2 of the EIS contains a gross falsehood regarding availability of rock. It states, “Finding hard rock resources close to Port Macquarie is considered a difficult prospect”. This is clearly incorrect and fails to mention the above local resources.
10. The EIS seeks to give the impression that the PMHC Local Government Area (“LGA”) is running out of rock faster than it is running out of house blocks. In fact, the reverse is the case. On any factual analysis (and I am sure PMHC would agree), PMHC LGA is running out of blocks much quicker than it is running out of rock. There is not

a 15-year supply of residential land in PMHC LGA. There is in fact, only 7 years supply not considering 2017 Biodiversity Legislation.

All the above demonstrates that there are significant flaws in the EIS. As a document to form the basis on which a planning decision is made, it is extremely misleading and deficient.

If one wants an example of why Hanson cannot be trusted, one only needs to look at the existing quarry. One of the license conditions is that there should be maintained a screen of trees immediately to the east of the existing quarry. There is no such screen. This is not an onerous requirement but Hanson has chosen not to comply with the screen of trees conditional requirement for the existing quarry. If Hanson cannot do this simple thing, it really makes one wonder if they will be able to comply with all the regulatory requirements for a significantly larger new quarry which is much closer to residential areas than the existing quarry.

As mentioned above, there are alternatives to Hanson. Hanson has land at Bago and there is a recently approved quarry owned by CTK NR Pty Ltd adjacent to this land which could be a source of rock and as indicated above, there are several other currently operational quarries within the vicinity.

Obviously, approval of this new quarry will give Hanson a significant and competitive position. Unfortunately it will be to the detriment of local residents. Existing and future communities will bear the impact of round the clock quarry operations, blasting vibration, showering from rock and dust, noise and truck movements. Owners of undeveloped land on Le Clos Verdun will lose out. No one in their right mind is going to buy a lot of land and build a house adjacent to a quarry. Long suffering owners of land in the Le Clos Sancrox development will lose out the most. They will be left with unsaleable and worthless lots because of proximity to the new quarry development. PMHC also loses out. PMHC potentially loses the availability of land identified in the UGMS 2017- 2035. In simple terms, approval of this expansion will make a bad situation (an acute shortage of land in PMHC for development) much worse.

I believe that I have demonstrated that the EIS for this project lacks credibility. It should therefore not be used as the basis upon which to make a decision. I have also demonstrated that there are alternatives to the development of this new quarry. Accordingly, I object in the strongest possible manner to this project going ahead.

Yours sincerely

Jim Wade