

Concerned Resident
Clarence Town Rd
SEAHAM

6 April 2017

Submission on the Brandy Hill Quarry Extension

I oppose the extension of the existing hard rock quarry and the proposal for 24 hour operations seven days a week. The reasons for my opposition are as follows:

The proponent proposes to clear 45.8 hectares of Koala habitat.

The Koala has been listed as 'vulnerable to extinction' under the NSW *Threatened Species Conservation Act 1995* and 'vulnerable' under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

This habitat does not only support an active population of koalas but the vegetation that is to be cleared contains one primary koala food tree species (*Eucalyptus tereticornis*), three secondary koala food trees species (*E. canaliculate*, *E. moluccana*, *E. punctata*) and one supplementary koala food tree species (*E. globoides*) as well as equally important shelter trees.

It has been acknowledged that the main threats to Koalas are habitat loss and habitat fragmentation, both of which will occur should this proposal be permitted.

Hanson is proposing to purchase 1191 Koala credits to off-set the destruction of this habitat. I fail to see how purchasing credits that will manage land for conservation elsewhere will help towards the conservation and protection of this population of koalas.

It has also been acknowledged within Appendix 7 – Biodiversity (page 76), of the Environmental Impact Statement (EIS) that the current flora and fauna assessment was conducted in winter during cool and rainy weather "which is not suitable time to determine the presence of most threatened species". I then question, among other things, the results of the determination of population size of koalas as one of the methods used required using koala scat which would have been destroyed during rainy weather, thereby possibly underestimating the population size.

The proponent proposes 24 hour operations 7 days a week

The proposal for an increase in operations 24 hours 7 days a week will result in a marked increase in truck movements both to and from the quarry. As such, both Noise and Traffic Assessments were conducted and reports submitted, Appendix 8 & 9, as a component of the EIS.

While much of the increased quarry traffic is expected to occur on Brandy Hill Drive south of the quarry it is also expected that quarry traffic will increase on Clarence Town Road east of the quarry, which is where my family reside, especially during times of flooding when the route to Raymond Terrace can be cut off.

Vipac conducted noise monitoring at various sensitive receivers along Brandy Hill Drive with the nearest receiver, R19 which is located approximately 31 metres from Brandy Hill Drive, being used to monitor for night time truck movements and sleep disturbance levels.

My residence is located at a setback distance of approximately **17 metres** from Clarence Town Road. In their report Vipac have predicted future night time noise levels externally at 74 dB (A) but have factored in the following:

“Typically building facades exposed to the road are generally closed structures (including doors and windows) which provide a degree of attenuation (in the order of 20dB) to the inside amenity of the building.” (page 26 Appendix 9 – Noise & Vibration Impact Assessment)

As a result, Vipac have decreased the predicted night time noise levels to 54 dB(A). I dispute this methodology for the following reasons:

- My family reside in an older style weatherboard cottage that does not have air-conditioning.
- As a result, during the warmer months, approximately 4 months, due to the uncomfortably warm conditions within the house we have most, if not all, of the windows and doors open during the night time hours to cool both ourselves and the house down.
- We are unable to sleep with the windows and doors closed due to the oppressively hot conditions within the house.

As a result, noise levels within the house during the night time hours would be closer to the unamended level of 74 dB(A). I refer to the Sleep Disturbance section contained within the NSW Road Noise Policy (page 34) as to the adverse health effects on myself and my family that exposure to such night time noise levels may have and in particular the following:

“Further studies by the enHealth Council (2004) and the guidelines published by the World Health Organisation (1999) were reviewed and analysed in terms of the guidance on noise exposure and sleep disturbance. The enHealth report states that:

‘as a rule for planning for short-term or transient noise events, for good sleep over 8 hours the indoor sound pressure level measured as a maximum instantaneous value should not exceed approximately 45 dB(A) LA, (Max) more than 10 or 15 times per night’.” and;

“The World Health Organisation report (2009) uses L_{Night,outside} as a primary measure of night-time noise. This is the yearly average of outside façade noise levels during the nighttime period, and **roughly equivalent to the LAeq9hour night-time descriptor.**

Groups vulnerable to night noise exposure include the elderly and shift workers; children tend to be less sensitive. The report concluded that, although individual responses may vary:

- at L_{Night,outside} levels of <30 dB(A), no substantial biological effects are observed
- at L_{Night,outside} levels between 30 dB(A) and 40 dB(A), a number of effects are observed, but their impact is modest
- at L_{Night,outside} levels between 40 dB(A) and 55 dB(A), adverse health effects are observed, with many people needing to adapt their lives to cope; vulnerable groups are more severely affected
- **at L_{Night,outside} levels above 55 dB(A), adverse health effects occur frequently, and a sizeable proportion of the population is highly annoyed and sleep disturbed. Cardiovascular disease risk rises, and public health is also threatened.**

The proponents proposed water filled void in their Conceptual Closure Plan

Hanson, as part of their Conceptual Closure Plan, in Appendix 18 – Rehabilitation and Closure are proposing to leave a final quarry void with a bottom floor elevation of -78m AHD. It is further proposed that this void will be left as is to fill with water from rainfall and groundwater seepage.

Illegal dumping of rubbish is a huge issue, you only have to look at the sides of the local roads and Wallaroo State Forest to see the amount of illegally dumped rubbish. Should a void, even a water filled void, be left after quarrying has been completed it has every likelihood of becoming an illegal dumping ground. The only way to stop this happening would be strong fencing and regular security patrols of the area. The expense of which should be borne by Hanson as they created and profited from the void in the first place.

As this is unlikely to happen, instead of a void the area should be reshaped to create as natural a landform as possible so that the area can eventually be returned to its natural state and incorporated and rezoned as E3 Environmental Management as the area to the east of the proposed extension currently is.

Regards

Concerned Resident