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Director – Resource Assessments
Planning Services
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001
Martins Creek Quarry Expansion – Application No SSD-14_6612

Dear Madam/Sir

I oppose the Martins Creek Quarry Expansion for the following reasons:-

DPE acknowledge there have been extra documents added to the EIS since it went on public exhibition. Most people, including myself, wouldn't know which or how many documents have been added since first viewing the EIS. This makes it very difficult to make an informed submission.

1. **Proposed Operating Hours.** It is proposed that the hours of operation at the quarry be expanded to:-

Quarrying – 6am – 6pm Mon – Saturday

Processing – 6am – 10pm Mon – Saturday

Pugmill mixing & binder delivery – 4.30am – 10pm Mon – Friday & 4.30am – 6pm Saturday

Loading & stockpiling for road transport – 5.30am – 7pm Mon – Saturday.

Train loading 24 hours / 7 days per week.

These proposed operating hours seem excessive and quite unreasonable.

2. **Environmental degradation.** The proposed expansion involves the clearing of 37.8 hectares of native vegetation which is important koala habitat. Although this is not a very large area, there has been extensive clearing of native vegetation by other extractive industries in the Hunter Valley. The cumulative effect of the clearing is very concerning.

3. **Noise, light & dust pollution.** The proposed expansion site is surrounded by homes which will be severely impacted by noise, light and dust pollution. Consideration must be given to the many residential properties surrounding the quarry site. Most if not all operations in a gravel quarry will produce excessive noise.

4. **Increased truck movements.** The proposal is to increase truck movements from what I believe to be the present approved 28 movements per day to up to 215 laden truck movements per day with up to 40 laden truck and dog combinations per hour from 5.30 am, which is just the time when heavy fog is at its worst. These are only the trucks leaving the quarry. There would of course be a similar volume of empty trucks returning to the quarry. There are other truck movements transporting fuel, explosives, flyash, hydrated lime, slag, binding materials etc (some but not all of these are mentioned in the Business and Extraction Report, 2.5.1.7 and 2.1.5.8) to and returning from the quarry. These proposed truck movements represent an enormous increase over the present approval.

These trucks will be travelling on rural and local council roads which are not suited to traffic of such intensity. All trucks travelling south from the quarry, which is expected to be virtually all truck movements, will need to negotiate the single lane Gostwick bridge over the Paterson River and this could cause considerable congestion. Even Daracon's EIS states the potential for road traffic problems as 3A. The truck intensity would be reminiscent of the bad old days when coal was hauled from the Hunter Valley mines into Newcastle by road.

Daracon's justification for commencing truck dispatch at 5.30am is questionable. It argues that concrete batching plants need gravel deliveries from early morning as concrete is necessarily dispatched from, say, 7am. However, concrete plants have a stockpile of raw materials before commencing production and it is debatable to claim gravel delivery is required virtually at commencement of business.

5. **Existing road network.** The road network which the trucks would need to travel is woefully inadequate for traffic of this nature and intensity. The single lane Gostwick bridge is a glaring problem. Further south the delightful Paterson village, which has a tight 'T' intersection followed by a narrow 'dogleg' bend, are further challenges with the safety of other road users a problem.

6. **The Village of Paterson.** I have issue with the plan for re-alignment and the placing of barriers at the Gresford Rd / Duke St corner, the Paterson Post Office corner. This plan has been dropped into the EIS well after the exhibition period commenced and many people will be unaware of its inclusion. It appears that the proposal is to resume part of the post office corner to ease the tightness of the corner. Further, it appears a concrete traffic separation barrier is proposed in Gresford Rd just west of the corner. There appears to be no suggestion of a pedestrian crossing which I believe would be necessary with the increased traffic. There would also be the likely loss of on-street parking adjacent to many of the village's businesses. I believe these roadworks would destroy the 'village' atmosphere and find these proposed changes unacceptable.

7. **Rail transportation.** Although the EIS clearly describes the quarry's dedicated rail loading facility, and although I believe a condition of the Quarry's current operating consent is to transport 70% of product by rail, the EIS says '*road delivery becoming the preferred method of transport*'. This is despite the statement in Appendix D of the EIS, Rail Logistics Operations for Martins Creek Quarry, page 16 '*Whilst rail transport has a clear operating cost advantage over road transport . . .*' It is then argued that '*rail network congestion makes rail transport expensive over short distances*

and small volumes.' However page 11 of the same document clearly shows usage of the Martins Creek section of the rail network running at well below half the ARTC's '*practical capacity*' for the section. The problem of '*small volumes*' is already addressed at 6.2, Recommendations, of the same document '*consideration should be given to extending the sidings to allow for the operation of longer trains*'.

Appendix D, Heavy Vehicle Route and Market Assessment, page 2 states that in the period November 2013 – October 2014, 1.1 million tonnes of gravel was produced. Of that 1.1 million tonnes output, which is well over double the current approved extraction rate of 449 000 tonnes per annum, 53% or about 580 000 tonnes went to either Newcastle or Maitland (pie graph page 3). Although there is direct rail through Maitland to Newcastle, only 5.44% of '*train loaded material*', about 60 000 tonnes, was transported by rail (pie graph page 5).

Appendix D, Rail Logistics Operations for Martins Creek Quarry Point 5.2, Current Market for Railway Ballast, page 12 states '*it would appear that a steady state consumption of around 250 000 tonnes per annum is required for maintenance purposes for the rail network within the historical catchment of Martins Creek Quarry.*' One ballast train of 22 wagons, which the quarry loader and existing siding length can handle without difficulty and fully load in 2.5 to 3 hours, can transport approximately 1296 tonnes of gravel (Appendix D, Rail Logistics Operations for Martins Creek Quarry, Table 5 page 14. One train load per day by 5 days by 48 weeks means some 310 000 tonnes could have been transported by rail but only about 60 000 tonnes was transported by rail. This equates to just one train per week! Obviously the rail service is being underutilised at the expense of the local road network and considerable risk to road users.

When it appears just one train load per week on average was dispatched during the Nov 2013 – Oct 2014 period, why does Daracon propose train loading 24/7?

Should the proposed expansion be approved, I would expect conditions be applied and expect they be strictly adhered to with meaningful penalties for a first breach and escalating penalties for subsequent breaches or exceedences. Rail transportation must play a much bigger role, operating hours must respect the right to quiet enjoyment by the quarry neighbours. I believe the local councils, through which much of the product is currently transported by road, have the right to impose a road maintenance levy sufficient to offset the damage caused to roadworks by the haul trucks.

I have not made a reportable political donation.