

Bobs Farm Sand Mine Project

Response to Environmental impact Statement

I refer to the EIS prepared by AMMOS Resource Management Pty Ltd dated November 2018 in relation to the proposed sand mine off Nelson Bay Road at Bobs Farm. Estimated yearly production is 750,000 tonnes/year. Potential excavatable resource is 10M tonnes at -15m AHD. Access to the mine is to be off Nelson Bay Road and egress from the site will be onto Marsh Road and then back onto Nelson Bay Road.

This response is an objection to the proposal for the reasons below.

Traffic

As identified in the EIS, 90% of generated heavy vehicle traffic will travel westward. Despite this, all heavy vehicle traffic will be directed eastward to the Port Stephens Drive roundabout. While this takes advantage of the recent extensive road works in this area (I assume to enhance access and the gateway appeal of Nelson Bay as a destination), I doubt it was intended as a mine haul route.

Irrespective, the transferring of this heavy vehicle traffic to this key intersection creates congestion and safety concerns. While traffic assessment is during peak hour, the large volume of holiday traffic using Nelson Bay Road and Marsh Rd will be impacted in both directions.

Marsh Rd is a historically difficult road to maintain, is of poor quality and narrow. Inevitably, traffic wishing to go west will use this road, causing maintenance and safety issues.

Additionally, the proposal for heavy vehicles coming from the east to reach the Nelson Bay Road entrance is complex and dangerous, despite apparent line of sight assurances.

Environmental impact

Despite the partial loss of mature vegetation on the site due to the current farm, significant trees are being removed and will not be replaced under this proposal. The tall trees are a significant drawcard for the Port Stephens area, yet continued deforestation along this gateway corridor is diminishing this.

Visual impact

Further to the loss of trees generally, the proximity of the mine and its stockpile/infrastructure, together with the further roadworks and entry point off Nelson Bay Road, as well as the continuous movement of heavy vehicles in the area, combine for a very negative visual impact in what is presently a well vegetated entry way to the area.

Lack of rehabilitation plan

The outline rehabilitation plan is largely irrelevant in the context of the final impact of the extractive activities. Of course the proponent will remove its bunding and site infrastructure (at a relatively modest cost). The issue is the lack of remediation of the site i.e. addressing the pond left after extraction below -15m AHD. If the proposed remediation is not to fill it in, it should provide a valid cost and scope for whatever it is proposed to be done in its stead.

I note the lack of supporting industry/operator documentation for the eco-park or the solar farm. Unsurprising. I wait with interest the opportunity to watch my grandkids engaged in sailing training on a small polluted brown pond 30 minutes shy of Nelson Bay, while reclining on the deck of my

Maldives-style bure over this turbid pit. Volunteering some as yet unidentified commercial entities to the two improbable operations in 15-20 years' time I'm sure does not satisfy the SEARs in this regard.

Lack of exploration of environmental impact

The creation of a large body of exposed groundwater within a class 3 / 4 Acid Sulphate Soil area, with no management plan, cannot satisfy the intent or requirements of the SEARS nor clause 7.1 of the LEP.

Alternative of Not Proceeding

Section 2.14 of the EIS is entitled Alternative Of Not Proceeding. It does not address this in any way. There is no case made as to, for instance, whether there are other sources of sand (or are these just competitors?) or alternative uses for the current site (other than the failed fig farm).

To paraphrase the EIS:

- There is sand that could be sold in the short term creating a handful of transient jobs
- The current farm may be unviable
- In the future the site could be used for something else that could be viable

In fact, the alternative of not proceeding is for there to be no environmental degradation, no potential for groundwater pollution, no loss of visual amenity nor creation of an eyesore in a gateway location, no traffic safety and related issues, and a potentially more suitable, long term viable use for the site identified.

Port Stephens and its surrounds are areas attractive to families, visitors and locals as a place of natural beauty and related amenity, focussing on its waterways and woodlands which are evident as you approach from the west. The development and maintenance of Port Stephens to this end should be the priority of both local and state government.

On this basis, this proposal should be rejected.

Regards



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