

## **State Significant Development Application No SSD 6395**

### **Bobs Farm Quarry - Sand Mine Project**

I wish to place an objection to the proposed Bobs Farm Quarry.

#### **Insufficient evidence to justify the quarry**

The EIS reports states that in section 18.1 Socio-Economic Considerations

‘The proposed sand mine represents a scarce significant source of high-grade silica sand close to the Sydney and Newcastle glass and technology manufacturing markets. These markets are existing and there is limited local resources available for the supplying of these markets. The sand extraction can provide a cost-effective supply of high quality silica sand for local, regional, Sydney and international glass, ceramic and chemical industries.’

Elsewhere they state

‘QMS engaged Geochempet to undertake a high level analysis of sand samples deemed most likely to yield high end products. The review was focussed on the developed hierarchy of potential market segments above.

From this analysis it was clear that with washing and potential scrubbing of sand during processing it is likely that some of the above high end market uses may be achieved. This analysis then led to the development of the proposed concept plant provided in this report.

Note: It should be made clear that a full and complete plant design is required to accurately size individual pieces of plant and equipment and as such the information provided here is for concept consideration only and may change significantly depending on the sand feed provided for processing and the demands of the market into which the sands are being sold.’

It appears that there are undefined quantities of rare sand types available, but the actual amounts are not really known, dependant on the type of processing plant and analysis once extraction is underway. The report also mentions that it is heavily dependent on market prices and demand. I submit that the applicant hasn’t justified the destruction of the native vegetation and other negative impacts which I we detail in the following sections on a vague dream of fulfilling a possible market for rare sands. The bulk of the extraction appears to be sand that is readily available from existing sand quarries. As the life of the extraction is only expected to be about 15 years, no matter how scare or important this source of sand maybe it is only for a limited period and I submit that an alternative source(s) is going to be required anyway.

#### **Traffic**

The proposal to allow an extra 200 trucks (each 44 tonnes) per day along Nelson Bay Road is totally unacceptable. Large sections of the road are single lane in each direction and are rated only Class 5R, which typically would have up to 12000 vehicles per day. The EIS states that already Nelson Bay Road has around 15000 vehicles per day, suggesting that the existing road has reached its capacity.

The EIS hasn’t considered the cumulative effect of all the other sand quarries within the Williamstown/Salt Ash region of the existing truck movements, yet alone the potential increase of

movements to the approved daily limits. Estimates of 1400 to 1500 truck movements per day from these quarries have already been approved which is very significant without the threat of another 200 trucks per day. Nelson Bay Road is the only route into the Tomaree Peninsula which has a large percentage of tourist traffic that are not familiar with the road making it potentially unsafe and certainly not a pleasant experience with these huge sand trucks

The proposal to use a section of Marsh Road and then to travel further east to the Port Stephens Drive roundabout to turn around and then travel back again past the quarry, places unacceptable pressure on a minor road and adjacent school and an increase in traffic, noise and pollution for residents and other road users.

The EIS discusses the significant increase in emissions from these trucks regarding greenhouse gases but dismisses it as trivial compared to Australia overall emissions. I submit that the proposal cannot be considered feasible when considering Sustainable Development principles.

### **Noise**

The EIS addresses to some extent the noise during construction but appears to believe that a 4m sound barrier along the exit road will be enough to manage noise during operations. Noise from trucks stopping and then accelerating at the Nelson Bay Road intersection will be significant. With the processing plant located just inside the Nelson Bay Road entrance, noise is likely to be a problem with the plant itself, truck movements bring the raw sand to be processed, sorted and treated and then loaded onto trucks to be transported off-site.

The proposed 15m vegetation buffer along Nelson Bay Road is unlikely to be significant to block the noise or to reduce the visual pollution of plant and storage area from the road.

### **Acid Sulfate Soils and Ground Water**

The EIS acknowledges that PASS is likely below 0.8m AHD and has what appears to be a simplified plan to treat any extraction with lime as necessary. There doesn't appear to be any consideration of exposure around the boundary of the "lake" particularly with varying water levels. During construction it will take a certain time to fill with water and during the life and after the mine the level of water must vary to a large extent. The proposal to use a new ground water licence to overcome the evaporation (estimated at 506ML per year) from the 25ha lake is another example of the project not being Sustainable Development. The excavation to 15m below AHD so close to the waterways of Port Stephens raises concerns for the ongoing fishing and aquaculture industries in addition to potential contamination of Hunter Water catchments.

### **Ecological Impact**

The EIS states that an area of 38 hectares of existing vegetation will be progressively cleared, including 'the removal of approximately 25.90ha of key habitat' (as defined by the NPWS). The EIS identifies habitat on site that is suitable for 43 threatened fauna species, and notes that 'The proposal will result in a significant loss of habitat for a number of the addressed species'.

The loss of approximately 25.90 hectares of supplementary koala habitat, habitat for nine other threatened fauna species and approximately 877 hollow-bearing trees is totally unacceptable.

The Hunter Regional Plan 2036 highlights the importance of the biodiversity corridors, one of these corridors extends through this proposal. Two of the relevant aims from the plan are:

14.4 Protect biodiversity by maintaining and,

where possible, enhancing the existing protection of high environmental value areas; implementing appropriate measures to conserve validated high environmental value areas; developing local strategies to avoid and minimise the impacts of development on areas of high environmental value and biodiversity corridors; and identifying offsets or other mitigation measures for unavoidable impacts.

14.5 Secure the long term protection of regionally significant biodiversity corridors.

As the ecological corridor is only 1.5km wide at the quarry site, the proposed reduction by 600m is very significant and in no way follows the aims of the Hunter Plan.

The proposed Bio-banking offset at another location near Nerong doesn't provide compensation for the loss of the key habit within this biodiversity corridor.

### **Rehabilitation**

The two proposed uses of the 'lake' after the life of the quarry are totally unacceptable, the region must be returned to native a wildlife corridor at least equal to the existing conditions to satisfy the requirements of the Hunter Regional Plan.

30/01/2019