

Submission Objecting to the Martins Creek Quarry (MCQ) Expansion Proposal

Overview.

- 1) I strongly object to Daracon's MCQ expansion and transport proposal.
- 2) Rail freight is the only acceptable method for this Quarry to get its products to market. It has been a rail Quarry to date and should continue as one if it is to be granted a new consent to operate.
- 3) Road freight is totally unacceptable to all of the communities on the route to East Maitland, and everyone that relies now and into the future on the services and amenity provided by the village of Paterson and/or the Maitland City Council area (MCC). The character, amenity, accessibility and services provided by MCC and in particular, the Paterson village will all profoundly suffer under this proposal.
- 4) The mitigations offered will NOT prevent or reduce the social impacts to anywhere near acceptable levels. The extra employment at the quarry will be be insignificant compared to the loss of amenity, services, employment and property values in Paterson and along the truck route ("Route 1").
- 5) The proposal does not address the traffic congestion that already and increasingly occurs in MCC and the expected growth from further population increases. It also specifically ignores the known increases from imminent projects.
 - a) Firstly, the new East Maitland Hospital opening this year and surrounding medical precinct will add a huge volume of traffic to the New England highway and many cross streets including Melbourne Street.
 - b) Secondly, when Brandy Hill Quarry adopts the new consent (likely in 2021), trucks to MCC must also use "route 1" from Bolwarra to Melbourne Street instead of Belmore Road through Lorn.
 - c) Thirdly, when prerequisite infrastructure upgrades are completed for Brandy Hill Quarry, it can more than double output to 1.5mtpa. The 25% of those trucks using that section of "Route 1" will more than double. The cumulative impact of both quarries trucks has not been addressed.
- 6) The adverse impact of traffic congestion on the amenity of all residents hasn't been recognised or addressed, nor the decline in productivity of the region from traffic congestion, nor the issue of slowing access to medical services.
- 7) The addition of a further 280 MCQ trucks/day in the continuously growing MCC area, plainly won't work now, in the near future, let alone in 25 years, for MCQ trucks, other road users or the general population.

Explanation

1. Transport Congestion.

Maitland and surrounds has had, and continues to have the highest population growth rate in the state. The historical traffic data used in the proposal is now well out of date. Traffic has increased significantly in recent years.

We experienced the extremely adverse impacts of Martins Creek Quarry truck traffic increasing congestion in Paterson and Maitland during the illegal operations. Even now without MCQ trucks, traffic congestion is a major issue. Adding the proposed MCQ trucking volumes to current and future

Submission Objecting to the Martins Creek Quarry (MCQ) Expansion Proposal

traffic will add to the already unacceptable traffic queues and bottlenecks. Melbourne Street currently is at a standstill in daily peak periods, as are all roads linking to the New England Hwy throughout MCC.

The new East Maitland hospital will open in 2021 and it and the new surrounding medical precinct will significantly increase traffic in the area with no planned road infrastructure upgrades to adequately cope with the associated traffic. Jenny Aitchison (member for Maitland) recently conducted a public meeting in Thornton about the current horrendous traffic congestion and delays in the Eastern MCC area. Adding up to 280 truck movements will both extend the peak traffic congestion's periods and increase the degree of grid locking.

The resulting increased travel times will adversely impact the productivity of all working people and businesses in the region, the amenity for all the residents and road users, and hamper fast access to medical help.

I have attended almost all of the community and consultative meetings on this Quarry Expansion from the outset, and Daracon's proposals have never addressed the community concerns about the adverse impacts of traffic on the area's character and amenity, or the social impacts. The impacts on Maitland have never been addressed, other than to propose Melbourne Street East Maitland instead of using Belmore Road through Lorn. We frequently use both which already have significant and frequent traffic jams.

MCQ trucks should not be permitted to increase the congestion.

2. Character, Amenity and Social Impact from Road transport

The assaults on the area's character and amenity and the social matters resulting from the proposed road haulage will far outweigh any local benefits from employment at the Quarry. Not only will the amenity at Paterson suffer but the loss of the ambience and convenience will diminish patronage of the shops, cafes, post office, chemist and fuel station etc. That will severely and permanently impact those businesses financially. During the illegal operations the loss of character and amenity was a real lived experience for me and residents. The financial impact on businesses was also real, not hypothetical, during the illegal operations. The financial stress of lost trade, on top of COVID which we are told will continue for some years, is likely to result in the short and/or long term collapse of many local businesses. The social impact of that will be disastrous.

If the proposed truck movements were to be allowed for 25 years, any loss of businesses in Paterson and the employment they offer will be much more of a financial loss than the few jobs at the Quarry. The loss of amenity for everyone that uses the services in Paterson will be incalculably more than the economic loss of any of those businesses.

3. The Road Transport Route is General Mass Limited

Haul route 1 has a historic bridge and many kilometres of local roads that have General Mass Limit (GML) load restrictions. The maximum gross vehicle mass on GML routes and bridges is limited to 50.5 tonnes, with pro rata limits on axle loads. Most Quarry trucks are legally capable of being loaded to vehicle gross mass and axle limits well above those GML limits. Vehicles registered under the National Heavy Vehicle (NHV) scheme, are capable of carrying even higher loads, but can only

Submission Objecting to the Martins Creek Quarry (MCQ) Expansion Proposal

legally do so on designated heavy vehicle routes. Routes can only be so designated if they comply with additional standards for lane and shoulder widths, and intersection standards for turning and acceleration lanes and load carrying capacity. Route 1, even with the proposed upgrades, will still only be a GML limited route, because of those standards and Gostwick Bridge. No trucks will be able to be loaded to more than GML and certainly not to NHV limits, which other quarries will be using.

In other words, road transport from MCQ will be much less efficient than other quarries that can load trucks to the higher NHV limits. More truck movements are needed for a given tonnage, and the diesel particulate and greenhouse gas emissions will also be higher/tonne than for other quarries on heavy vehicle routes.

Haulage costs/tonne are minimised by maximising the payload carried, so there is a huge financial incentive to load trucks over the GML limits. We therefore have many concerns that the weighbridge records from the Quarry have not been checked to ensure that all trucks have complied with GML limits, and we are therefore very concerned that future deliveries will also not fully comply.

Non-compliant loads are illegal, significantly detract from the safety of transport operations, place the public at high risk and contribute to amplified damage to road and bridge infrastructure. The quarry operator, truck owner and the driver all share a duty of care to not overload vehicles for the specific routes they will take.

If past weighbridge records show any non-compliance, Daracon should be fined, and should be regarded as unfit to hold a licence to operate the Quarry into the future.

I put that issue to the mayor of Dungog Shire Council (DSC) at the last community meeting in Tocal. While he agreed with the principle of limited loads on GML routes, he said DSC has not and was not planning to check weighbridge records (even though they are the current consent authority). He thought that would be the role of Transport of NSW! Surely the Dept of Planning should have the relevant authority check that the laws are being adhered to by the proponent. If not, the proposal must be rejected.

4. Rail Transport

Rail can and must be used as the only haulage method. Like the quarries near Marulan, Rail must be the main haulage method, and road can only be used if the haulage routes bypass the towns and villages.

As there are no bypass options for Paterson and MCC, NO Road haulage must be permitted through those centres. As was recognised in the department and IPC assessment of the Marulan quarry SSDs, rail has much lower diesel particulate and greenhouse gas emissions than road. Rail must be used where available to minimise the emissions of diesel particulates and greenhouse gases, but also to avoid those emissions in close proximity to the people living beside and using the haul roads.

Throughout the consultation period, Daracon has changed from wanting ALL Road and negligible rail to about 50/50 so recognises the benefits of rail. However, Daracon has never accepted or offered anything that mitigates the impacts of the proposed road haulage.

Submission Objecting to the Martins Creek Quarry (MCQ) Expansion Proposal

Given that an operating licence is issued for the Quarry, not specifically the operator, if Daracon is not content with operating it into the future as a **Rail Quarry**, then there will be other operators that will be willing to do so.

We are not advocating that the department deprive the state of a significant resource, just insisting that for the overall benefit of everyone, if consent is granted for it to continue operating; it does so as a rail-only Quarry.

5. Jobs

If Martins Creek Quarry and transport jobs are diminished by restricting consent and/or mandating rail transport, jobs will simply move to other quarries that can supply the market without the social impacts of the MCQ proposal. There will be no net jobs gain or loss within the NSW aggregates industry whether this proposal is approved or not.

However, if road transport in particular is approved, there will be job losses in Paterson, with flow on detriment to the character and amenity of the area. Those jobs won't transfer to other areas and nor will the character and amenity.

6. Conclusion

Daracon's previous RTS and revised proposals do not offer any reasonable mitigation to the disastrous consequences to the character and amenity of Paterson and MCC areas. These things were experienced during the illegal operations and this proposal is not much different to that which the community has already painfully endured.

Road haulage is completely unacceptable to Paterson and all that use its facilities, including me.

Please check the weighbridge records for compliance with the GML load limits on the roads and Gostwick bridge. If gross any gross weights exceed 50.5t or axle weights exceed limits then laws have been broken and the community and infrastructure put at risk. The proponent would not be fit to be granted consent.

The consequences of MCQ road haulage with the increasing population growth, new hospital, cumulative impact of the new Brandy Hill quarry consent and the already unacceptable congestion in the MCC area, have not been addressed at all in the proposal.

Fast access to the hospital and medical services is essential for the health and wellbeing of the population. Unnecessary additional traffic congestion is to be avoided. The only possible mitigation is to use only rail transport from the quarry, and that is a readily available alternative..

If consent is granted, Rail must be the only haulage method. That will eliminate all of the character, amenity, social and traffic congestion issues in Paterson and MCC. And importantly, also eliminates the health matters of fast access to hospitals and the negative consequences of the emission of diesel particulates in close proximity to many people, and the climate changing consequences of transport related greenhouse gas emissions.

Please do not grant any consent for the use of road haulage from the Martins Creek Quarry.

Neil Ritchie, Brandy Hill NSW