Submission Martins Creek Quarry Extension – Les Johnston

The proposed expansion of the quarry operation and substantial increase in rate of extraction is not supported. The reasons are related to the greatly increased level of noise impact, increase risk of water pollution and ecological impact on the local environment.

Surface water management

The quarry operations have been conducted for many years at this site and the operator has had the opportunity for site specific management procedures to be developed and applied to predict the impact of the proposed expansion. The data provided in the documents show that on site storages contain very large concentrations of fine particles which are evident from the suspended solids and turbidity concentrations. The colloidal properties of clay make the reduction in suspended solids concentrations problematic. There is no information provided on measures that have been found to reduce these concentrations. The size of storages alone has not been shown to be sufficient. The Blue Book modelling values do not appear to be realized by the on-site practices and soil type. As a result, the confidence of predicted impacts is very much questioned.

The management of rainfall events from the past needs to be expanded considerably due to climate change. The rain event of 2015 was described in the documentation. Further analysis should be obtained in the March 2021 rain event.

The expansion of quarry operations has not been integrated with rehabilitation of past quarrying areas. There is no evidence provided of rehabilitated areas and where runoff water quality is similar to that of undisturbed areas in the local area. The proposed expansion will entail the necessitate to management of larger volumes of surface runoff with high or even higher sediment loads.

Railway noise impacts off-site

The proposal to expand to 24-hour railway operations for ballast trains requires further consideration. It is necessary for night-time operations to include potential impacts arising from stationary train noise at junctions and points on the rail network where ballast trains need to obtain clearance prior to proceeding. This needs to be assessed as a new activity. The rail noise assessment procedure must be applied for this aspect of 24-hour operations. Whether this new noise may be generated has not been identified in the documents.

The sound exposure data set obtained for existing trains at 15 metres has not been provided. Experience has shown that such data needs to be carefully examined and some adjustments may need to be made for variable such as the existence of wheel flats, flanging on curves and brake squeal. Averages do not reflect worst case values. The scatter in results should be provided.

Railway noise impacts onsite

The proponent has used the railway infrastructure noise assessment guideline (RING) for noise generated from the rail siding within the premises. The proponent has mistakenly used the RING. Use of the RING was excluded from being used for assessing noise from rail infrastructure facilities such as stabling yards. These facilities are licenced by the EPA and subject to noise limits developed under the NPfI as is the case for industrial activities. Onsite noise from train movement is not separately regulated to that from stationary noise sources. Onsite train siding noise should be considered as being part of site noise. Train speeds on the siding are very slow and do not possess a pass-by character like main line operations.

Train shunting can cause impulsive noise. The proponent has not assessed the shunting of trains during loading for its impulsive character as defined in the NPfI.

The proponent has not considered alternative options such as developing a second rail loading operation that is more isolated from residential sites. A second rail loading activity may provide scope for more trains to be operated during day time rather than extending operations to a 24-hour period.

The proposal to use larger carriages and longer trains needs further information and reliance ought not be placed on noise from the existing carriage/locomotive configuration.

Transport noise

The proposal to develop an alternative transport route for haul road vehicles is welcome. This will reduce one of the existing noise impacts on residents of Martins Creek. The claim that this option would not be financially viable if 24-hour mining operations are not permitted has not been explored. The "feasible and reasonable" approach to noise control demands greater investigation than a one sentence claim submitted by the proponent. This option would reduce the impact of the mining operation on local residents with the existing operation and therefore should be considered as an option without the proposed 24-hour scale of mining activity taking place.

It is unclear if truck noise from vehicles on site is included as being site noise not separately using the motor vehicle noise policy. Vehicles onsite, just as railway activities onsite, must be cumulatively assessed as site noise under NPfI.

Mining Activity Noise

The existing mining activity is a legacy operation in that it has taken place for over one hundred years. It is the only significant industry in the local area. The very low ambient noise levels in the absence of mining operations contrast with the high noise levels from mining operations. The proximity of the site to the village of Martins Creek makes this proposal highly problematic. The noise conditions imposed on Environment Protection Licence 1378 reflect the existing use status of the mining activity. The proposed to significantly expand mining activities requires the project to be reconsidered under current requirements rather than a continuation of the existing activities.

The greatest impact of this project from an acoustic perspective, is the introduction of 24-hour operations. Noise levels during this period, even with the proposed acoustic wall, are in excess of acceptable noise levels due to intrusiveness. When coupled with late night train loading activities and train shunting, late night noise will be offensive as defined in the Protection of the Environment Operations (POEO) Act. The local community has come to some degree of "acceptance" of the existing activity and sees the quarry as having a right to continue. That "acceptance" would be broken should 24-hour operations commence using the "reasonable and feasible" proviso included in NPfI.

The proposed noise controls indicated by the proponent are subject to whether demand for the product (at the price offered) will be realized. This "offer of noise controls" is not satisfactory as it does not provide impacted residents with any surety of noise management in the future. Any consent approving changes of use should be subject to environment protection measures being put in place beforehand.

The future use of diesel for onsite equipment over the timeframe of this project is open to speculation. There are mining sites which are in the process of converting to battery powered heavy

machinery. Noise levels from such equipment are significantly less than that from diesel engine equipment. It would be appropriate for this option to be provided and be included in any approval

Rehabilitation plan

It is noted that the proponent has not proposed a definitive rehabilitation plan as the site is owned by others. This situation is not satisfactory. There is a need for the site to be progressively rehabilitated and the mining proponent be held responsible for site rehabilitation. Progressive rehabilitation should take place as overburden is removed from the proposed new mining area. Once the overburden is removed, its point of dumping is likely to become its final placement due to the cost of double handling. The construction of the proposed acoustic wall, if that takes place, is likely to become a permanent fixture post mining as no funds are made available for its relocation.

Biodiversity offsets

The offsets proposed for biodiversity loss represent a “preliminary” approach. There is insufficient definition in what will be achieved. Biodiversity offsets has been heavily criticized for its lack of clarity, transparency and delivery. The risk of an offset being subject to bushfire for example means that offsets are subject to mass failure. Property ownership transfers over generations does not ensure the integrity of the offset will be sustained. The proposed offsets are in close proximity to the proposed mining extension. While this may enable relocation for some species, it also posses the risk of total loss through bushfire for example. The these reasons, the proposed offsets are not considered acceptable and further exploration must be undertaken.