

I oppose the Martins Creek Quarry (MCQ) Expansion proposal 2021.

In summary It is not in the public interest particularly in regard to: traffic safety, traffic congestion, burdens on road management and maintenance, tourism, local business precincts, biodiversity, and rural amenity for residents, tourists and the public.

280 truck movements per day is a very high volume, equating to 40 truck movements per hour.

The proposal will have considerable negative effects on traffic congestion and safety that is not in the public interest. Nor is it in the interest of the local government areas of Dungog and Maitland Councils, as it will add burden to their resources and finances in respect to road and traffic management and road maintenance for the 25 years of the proposal.

Traffic Impact Assessment (TIA) does not adequately address safety concerns in the Paterson village. I frequent Paterson village and conduct business there almost daily. The roadside parking utilised by the public for access to the village businesses is key to maintaining business patronage due to its convenience. Excessive truck haulage through Paterson village will be detrimental to this facility and negatively affect Paterson businesses. As 40 trucks per hour in addition to normal traffic volumes is difficult to negotiate safely without pedestrian crossing assistance. No consideration for cyclists is given. Business patrons exiting/entering their vehicles have limited safety distance particularly if two trucks are passing. In the proposal the proponent proposes to remove some parking to allow for safe truck movement. There are at least 13 businesses in the main streets of Paterson, including but not limited to the post office, butcher, grocer, dance hall, art gallery, café, service station, hairdresser, GP clinic and pharmacy. These local community business interests must be considered and protected which extends to the convenient parking for patrons.

Bus stops in the main street are frequented by school students and the exposure of excessive heavy vehicle movements combined with no designated pedestrian crossings is a real safety concern which again has not been adequately evaluated in the TIA. The exposure of a pedestrian to heavy vehicle and subsequent consequences in the event of a traffic accident, is possible fatality, but no safety mitigations have been proposed with any level appropriateness above administrative. Risk calculations of high and extreme must have eliminated or engineered mitigations for the risk calculation to be reduced, this does not happen in the proponent's risk evaluations as evidenced in the Social Impact Assessment (SIA). Any costs related to changes to the current road conditions, should it be proposed, must be 100% contributed by Buttai Gravel Pty Ltd, the proponent, which is part of the Daracon Group. Any lesser percentage would not be in the public interest and burden local government area councils for only the profit of MCQ.

My child attends Dungog High School and catches the bus from/to Paterson on this proposed heavy truck haul route, and I am extremely concerned for student safety and the safety of all persons using the bus services in Paterson should the proposal be consented. As their safety has not been assured through the risk evaluation process of the proponent.

The main haul route utilises Flat Road and the Melbourne Street/Pitnacree Road traffic light which is part of the Brandy Hill Quarry consented haul route. The TIA does not appropriately consider the congestion of normal traffic at the Melbourne Street/Pitnacree Road traffic light intersection with the additional Brandy Hill Quarry consented usage. High congestion and wait times already exist in morning and afternoon peak periods from all approaches to the intersection. No consideration is given in the TIA to time testing of stopped trucks queuing at the lights and their delays in take-off and the subsequent affects to the onflow of traffic. This intersection is physically constrained which inhibits its ability to be upgraded and the TIA makes no recommendations for any improvements. Thus, a known traffic problem exists and the proposed MCQ trucks will compound this problem by 280 truck movements a day, but MCQ offers the public no solutions. Again, this proposed expansion is not in the best interest of the public.

The only alternative haul route is through Lorn, and although the proposal removes Lorn as the main haulage route it still proposes to utilise it for Maitland deliveries or emergencies. A trucking haul route through Lorn, with its shopping precinct, school and high level of residents is also not in the public interest. As the built-up area of Lorn, its roads, and the bridge to Maitland are also physically constrained. Meaning limited ability to expand and improve traffic safety. Again, the traffic lights of Belmore Road/High Street already have congestion from all approaches at peak times, this would be compounded with truck haul road usage. Again, the stopped trucks at the lights will negatively influence traffic flow but no testing or investigation has been undertaken in the TIA of the proposal.

The proposed hours of operation coincide with shopping precinct business hours and school hours. The safety of the public with the volumes of truck movements proposed is not assured. Nor is the any mechanism to monitor truck movements through the Paterson or Lorn areas to ensure compliance and excessive movements are not undertaken. As has happened in the past resulting in the Court ruling of cessation of activities for MCQ.

The TIA does not properly consider nor address the congestion and difficulty for residents utilising Hunterglenn Drive/Paterson Road intersection, Bolwarra Heights. Particularly with respect to the consented Brandy Hill trucking contribution. Residents and the public attempting to enter and exit Hunterglenn Drive already have significant wait times in morning and afternoon peaks. The proposed 280 truck movements a day will only further compound this issue with no consideration or mitigations proposed by the proponent. The proposal is not in the interest of these residents or the public. Any costs to alter the intersection would be a burden to Maitland Council local government area finances and resources which would only be for the benefit of MCQ. Any costs to alter the intersection, should it be proposed, must be 100% contributed by Buttai Gravel Pty Ltd, the proponent, which is part of the Daracon Group. Any lesser percentage would not be in the public interest.

The TIA does not properly consider nor address the congestion at the Y intersection of Tocal Road and Paterson Road, Bolwarra Heights. Particularly with respect to the consented Brandy Hill trucking contribution. The Y intersection currently merges the inbound to Maitland traffic from Paterson Road with inbound Tocal Road traffic, which continues on Paterson Road. Traffic outbound from Maitland wanting to continue on Paterson Road

must give way to inbound Tocal Road traffic, significant congestion at peak times with consented Brandy Hill trucks exists and proposed MCQ trucks at 280 movements a day will compound the issue. Tocal Road on approach to the Y intersection is significantly narrowed with the BP fuel station exit and physical constraints. The narrow road width for the trucks particularly at high volumes is concerning. Traffic flow, congestion and safety are not considered, nor mitigations proposed for this intersection. The proposal is not in the interest of these residents or the public. Any costs to alter the intersection would be a burden to Maitland Council local government area finances and resources which would only be for the benefit of MCQ. Any costs to alter the intersection, should it be proposed, must be 100% contributed by Buttai Gravel Pty Ltd, the proponent, which is part of the Daracon Group. Any lesser percentage would not be in the public interest.

The TIA does not adequately consider the residents of Paterson and Tocal Roads entering and exiting these roads from their homes, particularly on stretches that contain 100km/hr speeds with the volume of truck movements proposed. I live on Eelah Road and enter/exit Tocal Road on a 100km/hr stretch. Note there are at least 10 homes on Eelah Road, speculating each home to have at least two cars so subsequently at least 40 movements entering/exiting Tocal Road from this one location per day. There is no facility to enter a side lane and pick up speed before merging onto the road, nor is there a turning lane when exiting Tocal Road. With the volume of trucks proposed and the current high speed the safety risk increases, particularly when sitting in lane on Tocal Road and giving way to oncoming traffic before turning into Eelah Road from Paterson village. To enter and exit a road at such speed, with such high proposed heavy vehicle volumes is a real safety concern, with potential consequences of death in the event of a traffic accident a real possibility.

There are a number of other homes and properties whose driveway directly access Tocal Road in the high-speed zones, these residents have not been considered in the proposal. Insufficient safety considerations and risk calculations are undertaken in the proposal. Any mitigations proposed for intersections must be 100% contributed by Buttai Gravel Pty Ltd, the proponent, which is part of the Daracon Group. Any lesser percentage would not be in the public interest and a burden on Dungog and Maitland Councils.

Gostwyck Bridge is another concern, the wear and tear from truck movements and tonnages will limit its life. This one-way bridge has limited vision and at peak times has school buses and traffic queuing with the greater truck volumes there is real potential for traffic accidents. A second bridge would need to be built to mitigate this damage. Any secondary bridge or traffic changes to facilitate truck movement expansion must be 100% funded by the proponent.

I have concern for house and property values for Martins Creek from the proposed increase MCQ site operations, but also for Paterson and haul route residences from the proposed excessive trucking volumes. Decreased house and property prices of the many for the profit of the few is not in the public interest of our rural community.

It will adversely affect the attractiveness of the area for tourism as it negates the rural amenity and natural beauty of the area with its heavy truck movement industry. Melbourne

Street accesses the historic village of Morpeth on which trucks are proposed to haul. The historic Tocal homestead and historic Paterson village are tourism destinations themselves but also the gateway to the Barrington Tops National Park and rural destination of Dungog.

There is particular concern for the historic Paterson village, to which the detriment of the proposed excessive trucking volumes will be great. The Paterson Heritage Conservation Area with village historic listings are exposed to damage from vibrations from heavy truck road usage and volumes and is a real concern. The excessive trucking will adversely affect the character of the village, residents, public and tourists. The Paterson village has a strong sense of community as do surrounding areas, as evidenced in Facebook groups. The rural amenity for residents and public having business in the area would be adversely affected due to the noise of truck movement on pavement, empty trucks, and truck braking. The dust and air quality from truck loads and truck emissions would be significant.

The noise and air quality adverse effects on resident and public physical and mental health are real. This was experienced and evidenced in the past with the illegal activities of the MCQ as per the Land and Environment Court ruling. The court ordered cessation of the illegal MCQ operations which returned rural amenity to the area. The 1991 consent of MCQ operations and trucking activities is acceptable to the residents and public of Paterson village and residents of the existing haul routes. The 1991 consent allows MCQ operation but also the rural amenity of the area to be realised by residents and the public.

The Social Impact Assessment (SIA) does not acknowledge nor address the mental health and wellbeing of Paterson residents and residents around the quarry site or along the haul route from the adverse effects of noise and dust nor the traffic safety concerns of excessive trucking volumes. The risk evaluation of the proponent continually uses administrative level mitigations to reduce high and extreme calculations to low. This is not industry best practise for risk calculation, consultation in the SIA ignored my and others voices on this topic and continued to lecture on through the risk calculation process the proponent had undertaken. The SIA I attended in February 2021 demonstrated Umwelt and Daracon's dismissive attitude to public concerns raised. Their record of discussions is inaccurate with many omissions of dialogue that occurred at the meeting. Stakeholder engagement listed on page 5 of the ADA appears impressive however as Martins Creek Quarry Action Group reached out they found many residents and businesses that would be impacted by the expansion and trucking had no knowledge of the proposal, the vast majority once enlightened vehemently oppose it.

The Noise Impact Assessment (NIA) does not consider, acknowledge nor address the noise impacts from road or rail movements. It focuses only on the noise impacts of the quarry operations. The road noise impacts were a major part of the complaints that lead to legal proceedings in the Land and Environment Court. Yet still the proponent does not acknowledge nor address the road noise issue for residents and the public.

I have issue with how the proponent is presenting information in the proposal to the public. The truck movements, dust and noise emissions from production when the proponent was operating in breach of the 1991 consent cannot be used as background lawfully as the

activities were illegal. The proponent attempts to deceive reviewers by presenting them as background in this way. Deception with the skewed presentation showing only the changes across the 2016 EIS, 2019 EIS and 2021 EIS that present themselves as making major concessions in tonnage. However, they never present the public with the current legal 1991 consent tonnages which is a maximum extraction of 500,000tpa with not greatly more than 30% of material per annum, which roughly equates to 150,000tpa. The proponent Buttai Gravel Pty Ltd, part of the Daracon Group is attempting to more than triple this road movement under the current EIS. This deception is perpetuated on page 11 of ADA under "Roads and Traffic" heading where they equate the 500,000tpa as a level "not inconsistent with road haulage volumes occurring for at least 8 years prior to Daracon secured its licences to operate the quarry, in 2012" this was illegal activity by the prior operator as it exceeded the 1991 consent. They continue to ignore the legal validity of the 1991 consent for operations at MCQ.

The proponent advises it will "continue planning to expand rail markets and gain access to rail unloading capacity, in order to optimise transportation of product by rail, where reasonable and feasible". This statement shows no real priority on this avenue of transportation as it states it is planning to do it but has not undertaken it in this proposal. The reasonable and feasible wording no doubt refers to profit and expenditure involved in this form of transportation. Their lack of application and commitment to rail concerns me that they would later try to make amendments that would see 1.1 million tpa all by road. I am also concerned with the proponent's desire to have 24-hour access to rail movements. The 24-hour rail facility would be disruptive to the many residents of Martins Creek, Paterson, and properties along the rail line. Rail operations with consideration for these people needs to occur.

Hours of operation are offered by the proponent as some resolution, hours which coincide with shopping precinct business hours and school hours. This fails to remove road noise and safety issues, dust and air quality issues and their adverse effects on rural amenity for Paterson residents, residents along the haul route and the public. Nor is there any mechanism proposed to monitor truck movements and tonnages through the area to ensure compliance and excessive movements are not undertaken. As has happened in the past by the proponent resulting in the Land and Environment Court ruling of cessation of illegal activities for MCQ.

The proposal weakly addresses rehabilitation of the quarry site at the end of the 25 years, this is unacceptable. The Land and Environment Court has already ruled on the non-compliance of the operator so clear plans and costings need to be in place before any approval is considered, to future proof the area both environmentally and economically.

The droughts and bushfires of recent times have put stress on our local environment flora and fauna. As has the loss of land associated with the nearby Brandy Hill quarry. The Martins Creek and MCQ site has resident Koala population, a threatened species, evidenced in photos on the Martins Creek Quarry Action Group Facebook page 2021. It also has the endangered spotted tail quoll sharing the habitat, plus the endangered Slaty Red Gum. These important facts are not even mentioned on page 12 of the ADA under the

“Biodiversity” heading. It is not in the public’s interest to destroy 21ha of natural habitat containing endangered species.

Under page 8 of the ADA “Need for the Revised Project” heading the proponent lists the product supplied from the quarry in the past, most of these were illegally gained as the legal 1991 consent was basically for the winning of rail ballast. Therefore, those other products were part of the illegal activities of the proponent and previous quarry operator. This again attests to the proponent’s disregard to legal operation requirements, the lack of trust of the proponent by the public is justified. The 22 fulltime employees purported in this section of the ADA is of limited benefit when considering the hundreds of residents and public inconvenienced and adversely affected by the expansion provisions.

The proposed products of the MCQ are all available at existing quarries also located in the Lower Hunter Valley area, the most recent consent given for the Brandy Hill expansion, who were required to build a bypass for Seaham. The real “Need” for the revised project is that the products suit the Daracon Group’s business in rail and road works. The product at MCQ requires secondary treatment to produce alternative quarry product such as roadbase. Roadbase is said to be in short supply for Sydney requirements, if MCQ was supplying to the Sydney area would not rail transportation be prudent. However as evidenced rail is not a priority in this ADA. Note the other quarries of the Lower Hunter Valley area are all close to main highways whereas MCQ requires trucks to travel 28km until reaching major road networks such as New England Highway.

In short, I believe the MCQ expansion proposal does not meet state significant requirements but does negatively affect the lives of residents in the Martins Creek, Paterson, Tocal, Mindaribba, Bolwarra Heights, Bolwarra, Pitnacree, and East Maitland areas, including businesses and tourists frequenting the areas. The limited fulltime employee numbers and huge detriment to the area, local businesses, and the public, means the only profit is for the proponent and owner of the land who is leasing it to the proponent.