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File No. SSD-7293 / RJP001 C.C. Port Macquarie Hastings Council and Councillors, Community Groups and Residents

11th December 2019

The Secretary

NSW Department of Planning, Industry and Environment

320 Pitt St, Sydney 2000

GPO Box 39, Sydney NSW 2001.

Re: Application No. SSD-7293 by Hanson Construction Materials Pty Ltd for Sancrox Quarry Expansion Project

I am a resident of Sancrox NSW. I am very concerned about the proposed quarry expansion. Please find my preliminary submission in opposition the proposed project. My opposition is founded upon a number of **Key Issues** and relevant factors. Accordingly I have listed these below with a narrative and supporting information where appropriate. Please note that this submission is preliminary, as the proposed expansion project has only come to my notice recently. The proponent did not inform me nor did any state governmental department or local government therefore due to severe time constraints I reserve the right to make further submissions in respect of outstanding issues not yet fully addressed within my submission.

1. Community Consultation

The Community Consultation process as presented is deeply flawed. According to the EIS only one Community Consultative Committee (CCC) Meeting has been held with a very limited number of residents. See meeting minutes in EIS.

Most stakeholders in the Primary Study Area (PSA) have been denied or severely constrained by a failure of the proponent to properly advise of and execute a consultation process that is open, transparent and professional. This is inclusive of the notification and deployment of details and information to the greater Primary Study Area (PSA) community.

It is stated in the EIS that "Mr Simon Jones (Sancrox Quarry Manager) provided a copy of the advertisement via a letterbox drop along Sancrox Road and Fernbank Creek Road"

It appears no information or invitation to take part in the consultative process was issued or delivered to the balance of the PSA / Sancrox area that has the

potential to be significantly impacted by this project. This has resulted a high percentage of the landowners and residents of Sancrox being denied the opportunity to present their views and cases within the framework of an honest, effective and meaningful consultation process.

Another particular area of concern is recorded in the EIS. That is the role of Port Macquarie Hastings Council. I refer to the spread sheet-listing stakeholders. On this spread sheet it is recorded that Clinton Tink (Development Assessment Planner) and Sandra Bush (Senior Strategic Planner) have met with Hanson and carried out a site inspection. The spread sheet records the following *“Quarry visit with Clinton and Sandra was extremely successful. Both are impressed with the operation and are supportive of our development application. We discussed the potential buffer zone required and some fauna and flora issues. JK presented on an overhead projector our current and planned expansion area. Sandra and Clinton have committed to supporting our endeavour where we can and will be a valuable resource in the process”*

Please note that also according to the minutes in the EIS Sandra Bush attended the CCC meeting on behalf of council. If the matters as quoted on the spreadsheet are correct within the EIS then I would suggest a conflict of interest within the framework of an open, honest and transparent consultative process as council should not have offered support without consulting with constituents.

Hanson is owned by Heidelberg Cement and is headquartered in Germany with operations spread across the world. The following is sourced from the Heidelberg website and is in conflict with pattern of behaviour by the applicant.

Being a Good Neighbour

“We are committed to supporting the social and economic development of our neighbouring communities and ensure transparent communication to all our stakeholders.”

[Learn more ...](#)

- We maintain open and transparent communication about our activities and performance.
- We help improve the level of education and living conditions in neighbouring communities.
- We offer one hour of voluntary community work per full-time employee per year.

Conclusion and Recommendation

I submit that the consultation process has not been conducted in good faith, has not reached all stakeholders within PSA and groups at interest outside the PSA, is not in keeping with best practice consultative practices, is potentially compromised by officers of Port Macquarie Hastings Council and does not likely meet the intent of the governmental requirements. As such the consultative process including the CCC should be declared null and void.

I submit that this project not be given permission to proceed.

2. Corporate Record of Hanson/Heidelberg Cement Internationally and Australia

Central to the consideration of approval for this project in first principle should be an analysis of the performance and culture of Hanson Australia and it's other national companies and interests as well as international performance. Hanson is owned by Heidelberg Cement and is headquartered in Germany with operations spread across the world.

Please find the following indicative but not complete examples of performance:

United States of America

Environmental, Safety Performance, Labour Relations and False Claims - USA

Source: Violation Tracker Parent Company Summary

Parent Company Name:

HeidelbergCement

Ownership Structure:

publicly traded

Headquartered in:

Germany

Major Industry:

building materials

Specific Industry:

building materials

Penalty total since 2000:

\$130,361,472

Number of records:

614

| Top 10 Primary Offense Types | Penalty Total |
|--------------------------------------|---------------|
| environmental violation | \$123,441,955 |
| workplace safety or health violation | \$5,819,875 |
| labor relations violation | \$599,642 |
| False Claims Act and related | \$500,000 |

Notes:

Parent-subsidiary linkages are based on relationships current as of the latest revision listed in the [Update Log](#), which may vary from what was the case when a violation occurred. The penalty totals are adjusted to account for the fact that the individual entries below may include both agency records and settlement announcements for the same case; or else a penalty covering multiple locations may be listed in the individual records for each of the facilities. The totals are also adjusted to reflect cases in which federal and state agencies cooperated and issued separate announcements of the outcome. Duplicate or overlapping penalty amounts are marked with an asterisk in the list below.

United Kingdom

Source's HSE Executive UK, Ealing Council UK, Quarry Magazine UK, Construction Manager Magazine UK

- Sustained action by Ealing Council officers has resulted in Hanson Concrete, the UK's largest supplier of ready-mixed concrete, being fined.
https://www.ealing.gov.uk/news/article/1424/hanson_concrete_slammed_with_110000_fine
- Quarry Products Europe, which is part of the German multinational building materials supplier Heidelberg Cement, admitted breaching reg 8(1) of the Lifting Operations and Lifting Equipment Regulations. It has been fined £400,000 and ordered to pay costs of £11,376
<http://www.constructionmanagemagazine.com/news/hanson-fined-400000-after-worker-loses-four-finger/>
- Quarry blast goes drastically wrong. ... Barnstaple Magistrates' Court in the UK was told debris from the 2011 blast at Brayford Quarry in Devon also damaged waiting cars. WCD Sleeman & Sons was fined £20,000 and quarry operator Hanson Quarry Products Europe was fined £20,000, with £14,000 costs. <https://www.quarrymagazine.com/2013/05/08/quarry-blast-goes-drastically-wrong/>

Western Australia

Source Mining Monthly June 2019

- An insufficient windrow and narrowing haul road contributed to a fatal haul truck incident at a quarry at Red Hill, east of Perth, Western Australia, a Department of Mines Industry Regulation and Significant incident report has found.

NSW Australia

Source NSW EPA

- Wyong Hanson fined \$8,000
- Sancrox Hanson fined \$15,000
- Port Kembla Holcim (part owned by Heidelberg) fined \$30,000

Hanson Brandy Hill Project Execution Performance and Culture – NSW

Source Newcastle Herald and EPA

- *The Department of Planning has asked Hanson for more information after the Environment Protection Authority strongly criticised the company's approach to likely air quality impacts from an expanded quarry.*
- *The EPA was "disappointed" the company had "again failed to address the EPA's concerns" on its third attempt at an air quality impact assessment. The*

environmental watchdog recommended Hanson "seek an independent review by a suitably qualified expert before resubmitting the document".

- *Earlier EPA reviews found inaccuracies in the emissions inventory and model assumptions, the practicality of mitigation measures in the air quality management plan and approach to assessment of cumulative impacts of coarse particle dust pollution.*
- *Hanson "significantly underestimated" calculation of vehicle kilometres travelled on unpaved roads, which is a major contributor to dust pollution impacts, the EPA said.*
- *It considered some proposed controls "unfeasible", including a Hanson proposal for continuous watering of haul roads.*
- *The EPA said expected changes to the air quality methodology would "likely increase the predicted emissions" of the project.*
- *The EPA warned the Department of Planning that while air emissions and dust from the quarry could be regulated by the EPA under an environmental protection licence, it was unable to regulate truck movements to and from the premises.*

National

Source ACC

- The Full Court of the Federal Court has upheld an ACCC appeal, and dismissed a cross appeal by Cement Australia, against the \$20.6 million penalties imposed on Cement Australia Pty Ltd and its related companies for making and giving effect to anti-competitive agreements.

Cement Australia is owned by Heidelberg and Holcim

The following has been copied from the Heidelberg Commitment;

Ensuring Compliance and Creating Transparency

"We adhere to international human rights, anti-corruption and labour standards and co-operate pro-actively in an open and transparent manner with all our stakeholders."

[Learn more ...](#)

- We ensure compliance with international human rights, anti-corruption and labour standards through internal control and risk management systems, such as internal audits and a whistle-blower hotline.
- We ensure that our suppliers comply with our Supplier Code of Conduct.
- We ensure that each position is staffed with the most qualified person, independent from gender, origin, beliefs, and/or orientation.

Conclusion and Recommendation

The above information represents a slice of the corporate, operational, social, environmental, safety and overall corporate culture of the Heidelberg Group inclusive of Hanson. Heidelberg inclusive of Hanson's clearly fails in respect of permission to operate within an overall social licence context inclusive of environmental performance. It is totally unacceptable for the NSW Government to give permission for this project to proceed.

Given the record of the proponent I submit that the Heidelberg Group inclusive of Hanson does not prequalify for a social licence or formal governmental approval to proceed with the Sancrox Quarry Expansion Project.

I submit that this project not be given permission to proceed.

3. Contrary / Conflicting Zoning with Proposed Expansion Project

Application No. SSD-7293 by Hanson Construction Materials Pty Ltd for Sancrox Quarry Expansion Project is clearly not in keeping with the Port Macquarie Hastings Council Urban Growth Management Strategy so as to minimise conflict. Refer LEP 2011 and Sancrox Structure Plan 2014 – 2035.

There is also real or perceived planning conflict. That is the role of Port Macquarie Hastings Council. I refer to the spreadsheet listing stakeholders. On this spread sheet it is recorded that Clinton Tink (Development Assessment Planner) and Sandra Bush (Senior Strategic Planner) have met with Hansons and carried out a site inspection. The spreadsheet records the following *"Quarry visit with Clinton and Sandra was extremely successful. Both are impressed with the operation and are supportive of our development application. We discussed the potential buffer zone required and some fauna and flora issues. JK presented on an overhead projector our current and planned expansion area. Sandra and Clinton have committed to supporting our endeavour where we can and will be a valuable resource in the process"*

Please note that according to the minutes in the EIS Sandra Bush attended the CCC meeting on behalf of council. If the matters as quoted are correct within the EIS then I would suggest a conflict of interest within the framework of an open, honest and transparent consultative process.

Impacts and exposures arising from the project are not satisfactorily addressed in respect of current and projected residential sites therefore impacting health, safety, liveability, sense of space and quality of life. Please note that Port Macquarie Hastings Council is currently moving to reconsider zoning of the Sancrox area for other than rural residential eg. Le Clos with a likely leaning to residential as seen at the Sovereign Hills area. Therefore any current studies embodied in the EIS should be rendered invalid.

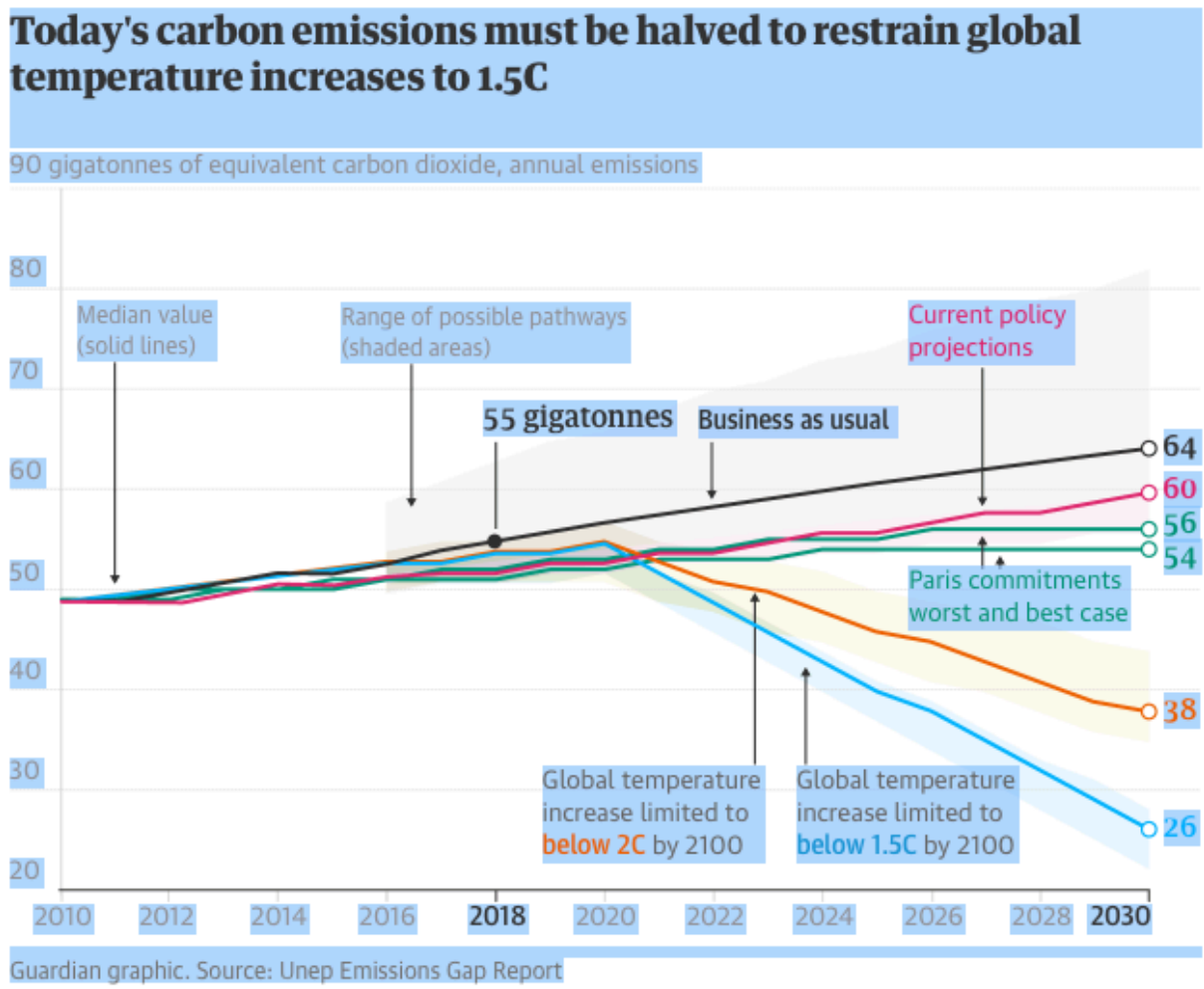
Recommendation

I submit that this project not be given permission to proceed

4. Greenhouse Gas (GHG) Emissions

The project 'over its entire life cycle is estimated to release approximately 48.4 million tonnes of CO₂-e into the atmosphere' The proponent seeks to contribute greenhouse gas emissions to the atmosphere at a time when the planet is warming, and the effects of climate change are affecting all life on earth. Port Macquarie Hastings Mayor has publicly acknowledged the grave costs that climate change poses to our community, including its link to the bushfires we face. This quarry undermines any action our community take to adapt to and mitigate climate change for our community health, safety and sustainable economic prosperity into the future.

There does not appear to be a mention in the EIS in respect of actual and aspirational targets to reduce GHG for this project only to offset in a speculative manner. The table below represents the world scenario in respect carbon emission reduction within the context of a climate emergency.



The following can be found on the Heidelberg Website.

Heidelberg Cement supports the UN Sustainable Development Goals

We have aligned our Sustainability Commitments 2030 with the UN Sustainable Development Goals (SDGs) enacted 2015 by the UN General Assembly, which have been adopted by all 193 member states. The SDGs aim to end extreme poverty, fight injustice and protect our planet with 17 goals set out for 2030.

For Heidelberg Cement, supporting the SDGs means fulfilling our share of the global responsibility to tackle the world's most pressing social, economic, and environmental challenges.

Reducing our Environmental Footprint

"We are committed to fulfilling our share of the global responsibility to keep temperature rise below 2°C, and we will continue to reduce our impacts on air, land and water."

[Learn more ...](#)

Emissions

- We will reduce our carbon footprint by 30% compared to 1990.
- We will increase the alternative fuels rate to 30%.
- We will reduce cement production-related SOx and NOx emissions by 40% and dust by 80% compared to 2008.
- We will permanently reduce all other air emissions below cement industry average.

Water

- We aim to reduce water consumption at all operational sites as far as economically and technologically feasible.
- We aim to implement water management plans at all sites located in water scarce areas and aggregate them on a country level to form a water reduction master plan.
- On Group level, all efforts will be combined in a global strategic water consumption reduction plan.

Land use

- All our extraction sites are operated based on an after-use plan agreed with local authorities and in accordance with the needs of local communities.
- We aim to include biodiversity enhancement recommendations in any new after-use plan.
- We want to implement a biodiversity management plan at extraction sites within or in direct connection to nature conservation areas

- In case of nature-oriented after-use plans, we aim to achieve a positive impact on the biodiversity value at our extraction sites.

The proponents of this project clearly have no connectivity or desire in the planning phase of incorporating the Heidelberg Commitment.

The following has been reported in the media on the 11th December 2019.

Liberal minister speaks out on climate change

“NSW Energy Minister Matt Kean has told a national conference that climate change is behind the state's current bushfire crisis and there is no use in “beating around the bush”.

Mr Kean began his speech by saying the bushfires had been caused by extreme weather events, high temperatures and the worst drought in living memory.

The Minister went on to say it was what scientists had warned of for decades and politics could not get in the way of winning the “climate wars”.

He said renewable energy was an economic opportunity “we would be negligent to miss”.

“To those vested interests and ideologues who want to stand in the way of this transition, I say enjoy your Kodak moment because the energy iPhone is on its way.”

Conclusion and Recommendation

It is evident that what the Heidelberg Corporation commits to is not reflected on the ground. Also see Item 2. The project fails to recognise the climate emergency. This project should not be given permission to proceed due to a failure to locally commit in the EIS to a plan for the reduction of GHG's in keeping with the Heidelberg statement and a failure to clearly indicate a fully detailed and costed offset plan inclusive of location and monitored results within the EIS that are factually beneficial in respect of all considerations.

I submit that this project not be given permission to proceed.

5. Impacts Upon Native Flora and Fauna Inclusive of Wildlife Corridors

The proposed development plans to clear more than 40 hectares of native bushland including threatened flora and fauna, habitat, and a koala corridor thus preventing north south site movement of native threatened and endangered animals. The area supports unique biodiversity and a wildlife corridor with a

total of 27 threatened species identified to date. This includes seventeen (17) birds and nine (9) mammals including seven (7) vulnerable species.

Native vegetation needs to be retained to combat species extinction by loss of habitat. Deforestation / Clearing will also contribute to degradation of the environment in respect of a contribution to GHG emissions and fewer trees will have a direct impact upon rainfall patterns. We are currently seeing an unprecedented drought and all that comes with this. The science is telling us to stop deforestation. This is particularly pressing given the large-scale deforestation that has already occurred within the Thrumster and Sancrox areas.

The loss of hollow-bearing trees is another concern – it takes 75-100 years for a eucalypt to form a hollow. The majority of hollow bearing trees recorded in the Biodiversity Assessment Report occur in the Spotted Gum - Grey Ironbark open forest – this association does not occur in the proposed offset area. Furthermore, no hollow-bearing trees were recorded in the proposed offset area and there is no mention of the provision of nest boxes as part of the proposed offset strategy.

In the EIS offsets have been identified in part but do not compensate for serious and irreversible impact on the natural environment. The details within the EIS are in the main without sufficient substance to give confidence.

The recent catastrophic bushfires in NSW have resulted in the loss of hundreds of thousands of hectares of bushland habitat and hundreds of koalas. These fires have occurred in areas adjacent to the proposed expansion and beyond in the local government area. Injured and now homeless koalas may migrate to, or have to be moved onto, the proposed development site. The proponent wishes to clear a viable patch of intact koala habitat when so much habitat in the region has been recently lost to clear-felling and fire.

The Greater Sancrox Structure Plan (Port Macquarie Hastings Council, 2014), identifies a portion of the the land to be cleared as medium to high activity koala habitat. The Urban Growth Management Strategy 2017-2036(PMHC 2017) classifies the area as a 'medium biodiversity asset/constraint' and identifies that the site could provide a 'major conceptual habitat link'. The Draft Coastal Koala Plan of Management 2018 (CKPOM) produced by PMHC identifies the area as core koala habitat. The clearing also destroys an identified critical link needed to maintain vegetation connectivity for animal movement.

The proposed Project area falls directly within a sub-regional biodiversity corridor. It is absurd to suggest that the loss of vegetation in the project area will not result in habitat fragmentation or the loss of connectivity between the proposed offset area and the remaining vegetation south of the project area. The figures in Appendix E of the Biodiversity Assessment are incomplete – widths are missing, and they seem to suggest that Connecting Link 2 will persist despite the clearance of all vegetation and the presence of machinery. The removal of the vegetation in the project area will effectively isolate fauna

that remain in the proposed offset area and the disconnection the offset area will greatly reduce its ecological viability.

In Depth Background Regarding Koala Habitat

In NSW, the Biodiversity Assessment Method (BAM) is the standard method used by accredited assessors to assess impacts on biodiversity at development sites. Under the BAM, koalas are currently an 'Ecosystem Credit Species'. This means that they can be offset in any compatible ecosystem.

Native Vegetation Clearance

The proposed Sancrox Quarry Expansion will involve the 'clearing 43.1 hectares of native forest vegetation, 0.55 ha of which is identified as the threatened ecological community Subtropical Coastal Floodplain Forest (NR117)'. The clearing will result in serious and irreversible environmental impacts at both local and regional scales.

According to the EIS Biodiversity report:

'Approximately 44ha (44%) native vegetation will remain within the inner assessment circle after clearing for the proposed development and around 411ha (41%) of native vegetation will remain in the outer assessment circle after development'

One can therefore conclude that 56% of native vegetation within a 100ha buffer of the centroid of the project area and 59% of vegetation within a 1000ha buffer of the centroid of the project area will be cleared. The Biodiversity Report has not considered the cumulative impact of vegetation clearance within a regional context and the continued fragmentation of remaining vegetation across the landscape. This project is yet another example of how biodiversity in the region is suffering 'death by 1000 cuts'.

Threatened Species and Koala Activity

Seven threatened bat species were detected in the fauna survey and an additional 23 'ecosystem credit' threatened fauna species were predicted to occur by the Biodiversity Assessment Credit Calculator. Unbelievably, however the BA Credit Calculator did not predict the Koala to occur in the area, despite the presence of PCT 1265 (Tallowwood -Small-fruited Grey Gum dry grassy open forest) – a trigger for the generation of koala 'ecosystem credits'. Why?

In 2011 - two small areas of high koala activity were located within the development site. In 2013 - Koala scats and scratches on tree bark were recorded in the development site. As koala scats decompose over a short period of time, the presence of scats is indicative of recent Koala activity and has been incorrectly described as 'not recent' within the Biodiversity Assessment.

Offset Strategy and Suitability of Proposed Offset

Koalas are already at risk of functional extinction. Offsetting does not increase populations. The offset will be secured either through purchasing and retirement of 2,449 ecosystem credits from the credit market (with some ecosystem credits to be generated by potential offset lands within the study area) or payment of an equivalent monetary value into the recently established Biodiversity Conservation Fund. Offsetting at a State level via

payment into a fund has several issues:

1. Genetic diversity: the importance of different genomes for koalas is widely understood for disease resistance. Removal of koala habitat, and therefore likely destruction of local populations, results in a failure to protect genomes in areas of high development pressure.
2. Resistance to Climate Change: Research has predicted that koalas on the coastal floodplain will not be totally resistant to climate change.
3. Community Value: Our community greatly value their koalas and do not want to see them offset away from the Port-Macquarie Hastings region.

The proposed offset site is a mere 49 hectares. Of the vegetation associations identified in the project area, two are not included in the proposed offset area. According to the Biodiversity Assessment 'there are stands of Swamp Mahogany swamp forest and paperbark swamp forest in the proposed offset site, however no such vegetation occurs within the Development Site'. Within the Port Macquarie Hastings LGA paperbark is not considered a primary or secondary koala food tree species.

The removal of Spotted Gum (winter flowering), Grey Ironbark (winter, spring and summer flowering), Blackbutt (spring - summer flowering) and Pink Bloodwood (summer - autumn flowering) species from the local area will result in the loss of crucial winter and autumn flowering species. Paying into a fund will not compensate the fauna of the local area for the loss of valuable feed species.

Conclusion and Recommendation

I submit that this project not be given permission to proceed due to a serious and irreversible impact upon the natural environment, poor offset criteria and significant contribution to increased GHG's.

6. Effects upon Water Security and Quality inclusive of Ground and Aquifers

Natural water on the site currently supports native flora and fauna. Should the project be approved this will be diverted to industrial use and north and west alluvial plains of the Hastings River resulting on impact upon Haydon's Creek.

The proposed Project will involve the penetration of an aquifer and extraction of water from the aquifer through the dewatering effect of the quarry expansion

In a time of unprecedented drought and global warming it is unacceptable that the local watercourse that currently supports native flora and fauna will be diverted to industrial use. PMHC councillors have also noted possible risk to local water security if pollution from the project were to enter the water supply that has been carefully planned over decades.

The Hydrology studies undertaken are dated 2017. Since then the overall state of NSW inclusive of the PSA has been in a prolonged and

unprecedented drought. The conclusions reached in 2017 may no longer be valid.

Conclusion and Recommendation

The information contained within the EIS has a high probability of not being appropriate and relevant. I submit that the project not be given permission to proceed due to the negative impact and threat upon the natural environment and the potential impact and threat to water security of the LGA and surrounding landowners.

7. Dust, Noise and Vibration Exposures

The EIS has delivered only notional exposures in respect of dust, noise, and vibration. These details are highly technical in nature and therefore for the ordinary stakeholder / person need to be explained clearly in plain English. To date due to the overall lack of an open, transparent, inclusive and effective consultation process and the failure to deploy formation this has removed any real opportunity to address all issues. Notwithstanding this please find the following observations;

Dust

The receptor areas as indicated in the EIS are not well founded and only notional. It appears some likely critical receptor areas have been excluded from the EIS. With prevailing wind and wind speeds the plumes of dust and fumes are more than likely to extend beyond the identified receptors and pass permissible limits well beyond those identified in the EIS. The EIS makes no mention of effective real time 24/7 monitoring at multiple locations and required action in respect of exceedances.

The EIS has no consideration in respect of real / potential changes in zoning and is devoid of such exposure modelling. See Item 3.

Vibration

The only vibration aspects sufficiently addressed are those related to blasting, as this is a statutory requirement. No mention is made within the EIS in respect of clearing, ripping and any other operations. No risk assessment is sighted within the EIS to address other potential matters.

The EIS has no consideration in respect of real / potential changes in zoning and is also devoid of such exposure modelling See Item 3.

Noise

The quarry development is approximately 6km west of Port Macquarie, which is bounded by Thrumster, which is undergoing significant real and potential residential development with the greater Sancro PSA that will be directly

affected by the increased environmental impact of the proposed quarry expansion. The Sancrox area has already had a substantial increase in noise (24/7), due to the upgrading of the highway to a motorway. Despite noise mitigation measures, the rural ambience is already reduced and any extra noise generation, especially at night, will only make it worse. The noise impact of a 24-hour, 7 days a week operation is particularly concerning. There would be no respite from constant noisy plant and equipment, inclusive of truck movements to and from the quarry.

No modelling has been sighted in the EIS as to the effectiveness of the proposed earth wall / bund to reduce noise to an acceptable level.

The EIS makes no mention of effective real time 24/7 monitoring and action in respect of exceedances.

The EIS has no consideration in respect of real / potential changes in zoning and is also devoid of such exposure modelling. See Item 3.

I sight the independent report in respect of the Hanson Brandy Hill Project in respect of noise. As can be seen there are serious questions to ask in respect of the proponent to diligently and honestly perform assessments that are fully independent and factual.

<https://brandyhillaction.files.wordpress.com/2017/04/attach-2-acoustic-review-brandy-hill-quarry-eis.pdf>

Recommendation

The applicant's permission to proceed with the project be refused.

8. Drill and Blast Management - Dust, Flyrock and Post Detonation Gases and Management of Explosive Agents and Equipment

The EIS allows for the measurement of blast vibration in accordance with state regulations and wet drilling containing dust. However it appears there is no mention of fly rock control and management of post blast gases that in sufficient concentrations are harmful. It is stated that a contractor will carry out the blasting with no explosives kept on site. However the EIS does not cover off on how the management of ammonium nitrate, emulsion, detonators and other matters are carried out so as to prevent a catastrophic explosion that could impact upon and beyond the PSA. There is no information in respect of controls, response plans etc. in the case of an incident. It is almost incomprehensible that this has not been satisfactorily addressed due to the potential for high loss of life and destruction. There is no apparent Principle Hazard Analysis (PHA) / Principle Risk Assessment (PRA) study within the framework of a recognised high to extreme risk activity. No comfort can be given the proponent's culture and record of poor performance.

Recommendation

The applicant's permission to proceed with the project be refused.

9. Asphalt Plant

It is propose to construct and operate an Asphalt Plant. These plants are known sources of hazardous air pollutants (HAP's) that are semi volatile, volatile and metal. Some consist of known Class One carcinogens (cancer causing agents) and other agents deleterious to health. The EIS does not appear to set up a real time monitoring regime to ensure that emissions including fugitive emissions plumes are detected and alarmed for automatic plant shutdown to prevent plumes affecting the residents in the area. With the prevailing winds residents in the areas are downwind are potentially exposed.

Recommendation

The applicant's permission to proceed with the project be refused.

10. Proposed Hours of Operation and Consequential impacts

The proposed extension to hours of operation to 24/7 represents a real and serious impact scenario in respect of exposures identified within the EIS and matters raised in my submission. These are raised with the body of my submission in particular Items 2,3,6,7,9,11,12,14,

Recommendation

The applicant's permission to proceed with the project be refused.

11. Traffic implications and Exposures inclusive of the Realised Industrial Growth in the Precinct and Future In Flow Projections

According to the EIS the site currently generates an average of 42 heavy vehicle trips per day. The proposed expanded quarry operations will increase average truck volumes to approximately 200 truck trips per day (a 'trip' is two movements – in and out of the site). This is a significant increase of approximately 158 additional heavy vehicle trips per day on Sancrox Road.

So that means at least 400 roundabout interfaces not inclusive of those from the growing industrial precinct, with heavy trucks most likely towing trailers with light vehicles per day on Sancrox and Frogs Roads. This represents a dramatic increase and consequentially a higher level of risk to motorists in the local area. In particular during night-time hours with reduced visibility.

The EIS does not take into account graduated and total traffic increases due to the present and ongoing increase in respect of the growing industrial area at Sancrox both east and west of the Pacific Highway. This is a major omission.

No consideration has been given to feed in from Sancrox Road in respect of proposed, planned or on the radar changes in zoning and population density. The study looks at the past not the future. This would most likely include school buses in the mix of increased traffic. This is a major omission.

The Local Government Area LGA has been beset by significant traffic congestion due to poor planning as exemplified by but not limited to the interfacing of Oxley Highway and the Pacific Highway, the Oxley Highway and Lake Road, the Oxley Highway and Wrights Road and Ocean Drive. The residents of the LGA inclusive of Sancrox do not likely have the appetite for yet another debacle.

In addition there is no mention of road pavement destruction / wear and tear and the cost/recompense to ratepayers as not all traffic is on the Pacific Highway.

To not fully consider all factors is an abrogation of excellence in forward planning, corporate and social responsibility both corporate and governmental.

Recommendation

The applicant's permission to proceed with the project be refused.

12. Amenity, Quality of Life and Sense of Place for Residents Existing & Future

There are real actual and potential negative social impacts associated with the proposed project inclusive of but not limited to increased traffic and heavy vehicle movements, increased noise and vibration, impacts to air and water quality and clearing of bushland, which have not been appropriately mitigated to prevent impacts to the sense of place and amenity of the surrounding area. See 3.

The strategic policy review of Port Macquarie Hastings Council (PMHC) highlighted that residents' sense of place is closely tied to the natural beauty of the Port Macquarie area as follows;

The loss of bushland and natural landscapes at the site, the establishment of new surface infrastructure and increased dust, noise and pollution associated with expanded operations in its current form will disrupt this sense of place.

Potential negative impacts to existing residents' "sense of place". The strategic policy review highlighted that residents' sense of place is closely tied to the natural beauty of the Port Macquarie area. The loss of bushland and natural landscapes at the site, the establishment of new surface infrastructure and increased dust, noise and pollution associated with expanded operations at the site, has the potential to disrupt this sense of place. It is a state and local priority to ensure that future development in the local area is balanced with environmental sustainability and biodiversity.

The EIS states: Between 2016 to 2036, the population of the PSA is forecast to increase by around 9,000 persons to 13,300 persons by 2036. This implies an average annual growth rate of 5.9%, this projected growth rate is much higher than Port Macquarie, which is forecast to be 1.3% over this same period. Most of this population growth is forecast to occur within the locality of Thrumster, which is directly south-east of the site..

No consideration has been given to feed in from Sancrox Road in respect of proposed, planned or on the radar changes in zoning and population density. The study looks at the past not the future. This would most likely include school buses in the mix of increased traffic. This is a major omission.

There are clear negative impacts to existing and future residents

Recommendation

The applicant's permission to proceed with the project be refused.

13. Employment and Economic Benefits

The EIS proposes a high employment economic benefit to the community. Then subsequently presents a disclaimer as follows;

"This disclaimer, together with any limitations specified in the report, apply to use of this report. This report was prepared in accordance with the contracted scope of services for the specific purpose stated and subject to the applicable cost, time and other constraints. In preparing this report, ERM relied on: (a) client/third party information which was not verified by ERM except to the extent required by the scope of services, and ERM does not accept responsibility for omissions or inaccuracies in the client/third party information; and (b) information taken at or under the particular times and conditions specified, and ERM does not accept responsibility for any subsequent changes. This report has been prepared solely for use by, and is confidential to, the client and ERM accepts no responsibility for its use by other persons. This report is subject to copyright protection and the copyright owner reserves its rights. This report does not constitute legal advice"

and;

It is a state and local priority to ensure that future development in the local area is balanced with environmental sustainability and biodiversity.

One can only call into question the overall benefits other than those to Hanson and the Heidelberg Group.

The EIS information is highly predictive is supposition only and is tied to the opinion of a consultancy service paid by Hanson.

The EIS states that their supply is required for the Pacific Highway upgrade. This has been completed from Sydney to Coffs Harbour and locations beyond. This is a false claim.

Within the EIS other quarries in the area have been identified that can satisfactorily maintain supply. It is nonsense within the EIS to suggest cartage would be required from Newcastle from another Hanson quarry.

Conclusion and Recommendation

The applicant's reliance on the EIS is voided by the disclaimers. The EIS has also been framed to deny other local quarries supply opportunities.

The applicant's permission to proceed with the project be refused.

14. Confidence in Quality and Accuracy of EIS

The EIS is subject to the following disclaimers as discovered to date;

"This disclaimer, together with any limitations specified in the report, apply to use of this report. This report was prepared in accordance with the contracted scope of services for the specific purpose stated and subject to the applicable cost, time and other constraints. In preparing this report, ERM relied on: (a) client/third party information which was not verified by ERM except to the extent required by the scope of services, and ERM does not accept responsibility for omissions or inaccuracies in the client/third party information; and (b) information taken at or under the particular times and conditions specified, and ERM does not accept responsibility for any subsequent changes. This report has been prepared solely for use by, and is confidential to, the client and ERM accepts no responsibility for its use by other persons. This report is subject to copyright protection and the copyright owner reserves its rights. This report does not constitute legal advice"

and;

It is a state and local priority to ensure that future development in the local area is balanced with environmental sustainability and biodiversity.

The EIS is in part notional, therefore not fully factual and as above without responsibility for implications. The EIS is at best speculative.

Given this together with the Key Issues as raised to date within this submission no comfort can be attained in respect of the proponent's application in respect of reliance upon the consultants advice in any manner in tandem with the proponents performance and behaviours as in Item 2.

Recommendation

The applicant's permission to proceed with the project be refused

Overall Conclusions

The examination of the proponent's submission and other information I have been able to access to date has provided clear evidence directed to a very high likelihood of significant adverse and negative impacts on the PSA.

No comfort or confidence can be attained in the proponent's application in respect of reliance upon consultant's advice in any manner in tandem with the proponent's performance state, national and international.

Therefore I respectfully call upon the Department of Planning, Industry and Environment to deny the proponent's application.

Please feel free to contact me in respect of any matters relating to this application.

Regards
Bob Preston