From: Megan Benson

Sent: Tuesday, 12 December 2023 2:26 PM

To: IPCN Submissions Mailbox

Subject: Deep Creek Quarry

Attachments: IPCN Deep Creek Quarry GEG Submission.docx





Dear Commission,

Attached is Gloucester Environment Group's submission of Objection to the Deep Creek Quarry proposal.

Thanking you,

Megan Benson.

Committee Member, GEG.



Gloucester Environment Group Inc

We acknowledge the Traditional Owners of the Land on which we meet and pay our respects to the Elders - Past, Present and Emerging

SUBMISSION TO: Independent Planning Commission 13 December, 2023

DEEP CREEK QUARRY (SSD 11591659)

OBJECTION

I speak on behalf of Gloucester Environment Group – a long standing incorporated volunteer organisation whose objectives include promoting public awareness of and participation in environmental issues affecting our community. We have over 120 current members.

We are concerned about the Project's long-term regional water, noise, air quality, and social impacts. Unavoidable cumulative and unmitigated impacts resulting from the concentration of so many quarries in our region, presents a very real threat to our public safety, environment and the natural systems that sustain us. The Project should be refused.

There are three main issues we wish to cover. The DPE's subjective assessment of resource and supply demand, the inadequate assessment of biodiversity impacts on threatened species, and the Project's erroneous traffic impact assessment.

Assessment Process:

We saw with the Brandy Hill and Martin's Creek quarries, the DPE's acceptance of anecdotal evidence there is a 'material shortage of quarry product' used as the basis for their approval. We see that again with Deep Creek Quarry.

The fact that competitive and reliable supplies of quarry products are critical to the NSW construction industry, does not justify Project approval. The DPE has produced no evidence to show there is, or will be, a critical shortage of readily available quarry material in NSW.

The 2019 report 'Supply and Demand Profile of Geological Construction Materials for the Greater Sydney Region' states there is sufficient reserves of hard rock to meet the demand to the Greater Sydney Region to beyond 2036, even under higher demand scenarios.

The more recent 2022 Federal Government's Infrastructure Market Capacity Report ² states that Sydney has sufficient capacity to meet upcoming quarry demand.

If there is to be a "balanced' approach to Project approval, the cost and benefits of not proceeding with the project should reflect the economic value our rural environment affords to the local and wider community. The MidCoast Council's Economic Development Strategy recognises our environment as a valuable economic driver. In the 2021-22 financial year, tourism generated \$608 million towards our local economy.³

The Hunter Regional Plan 2041 states that development proposals for aggregate extraction will be promoted if they are in accordance with the district planning principles and local strategic planning – that they should balance economic benefits with the protection of the environment and local communities.⁴

We see scant consideration of local planning aspirations and strategies reflected in the DPE's assessment of the Project⁵.

We see no strategic or cumulative impact context for quarry decision making. Each new quarry worsens the community and environmental impacts of these projects.

Biodiversity Impacts:

The environmental directives of the Hunter Regional Plan 2041 include "planning for aggregate extraction areas must ensure that those areas contribute to the longer-term formation of a green corridor, both during extraction (eg by maintaining existing vegetation links and/or restoration on areas not being quarried or mined) and on completion of resource extraction"⁶.

In the first instance, there is no "planning" for aggregate extraction areas that we are aware of. We face ad-hoc development of both operational and proposed quarries in our rural area⁷ that flies in face of community expectation. Decisions are taken out of our Council's

¹ https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-894%2120210203T100021.561%20GMT

² https://www.infrastructureaustralia.gov.au/sites/default/files/2023-04/2022 IA Market-Capacity-Report 2.0 HR.pdf

³ file:///C:/Users/megab/Downloads/MidCoast-Economic-Development-Strategy FINAL.pdf See attachment 2

⁴ https://www.planning.nsw.gov.au/plans-for-your-area/regional-plans/hunter-regional-plan-2041 Planning Priority 5: Promote sustainable use of mineral and energy resources

⁵ https://www.planning.nsw.gov.au/plans-for-your-area/regional-plans/hunter-regional-plan-2041/environment-and-lifestyle Barrington District

⁶ Hunter Regional Plan 2041 Planning Priority 5 Promote sustainable use of mineral and energy resources

⁷ See attachment 1

hands. Local knowledge and concerns are undermined by an assessment process that insists problems can be managed and offset.

Secondly, the Project fails to advance the protection of existing vegetation links and/or restoration of green corridors:

- The aspirations of Council's Tops to Lakes Initiative⁸ and the Lechner & Tiang 2018 commissioned study regarding Connectivity Modelling of the Karuah-Myall Catchments, NSW, Australia⁹ are ignored.
- The Project is in and will fragment the Karuah Nature Reserve to Black Bulga State Conservation Area connection an area that is important for connecting habitat.
- The Project is located within the Hawkesbury to Barrington Climate Corridors 2022
 regional mapping of vegetated climate corridors designated to provide climate
 change refugia for wildlife now and into the future. The report highlights the
 environments that are better able to withstand the impacts of climate change than
 regenerating sites¹⁰.
- The Project is located within the Great Eastern Ranges Initiative¹¹ wildlife corridor; one of only three areas on the eastern seaboard of Australia where inland ecosystems stretch all the way to the coast and identified as one the top three highest priority wildlife corridor areas in the Karuah Catchment.

The DPE notes the Project is located within the Wang Wauk State Forest Area of Regional Koala Significance and at its eastern end directly adjoins a known area of Koala generational persistence (ie Core Koala Habitat). Yet, downgrades the significance of clearing approximately 29.15ha of what they deem is "potential" Koala habitat because the Proponent will retain 235ha of "suitable" habitat within their property holding¹².

The supporting material which leads to the DPE's misguided conclusion that impacts are "acceptable", understates the significance of the site habitat for Koalas; arguing that low activity levels and a perceived absence of evidence of breeding are justification for clearing a large area of Koala habitat. Occupied Koala habitat needs long-term protection to recover the species¹³. The Koala is at risk of extinction in the wild because of the perpetuation of such unscientific, cavalier claims.

file:///C:/Users/megab/Downloads/Tops to Lakes Initiative Program Overview for Council Discussion%20(
2).pdf Existing reserves also do not reflect the protection of significant landscapes for ecological resilience or essential environmental services provisions. Environmental attributes underpin the regional economy on which residents and tourists to the Great Lakes rely. Enhancing and restoring the resilience and integrity of the natural environment thus achieves far-reaching social and economic outcomes

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⁹ https://www.researchgate.net/publication/331195091 Connectivity Modelling of the Karuah-Myall Catchments NSW Australia

¹⁰ https://www.hcec.org.au/climate-corridors

¹¹ https://ger.org.au/partners/hunter-ger

¹² P 18 Secretary's Final Assessment Report

¹³ https://legislation.nsw.gov.au/view/pdf/asmade/epi-2020-698

The Project will unavoidably generate direct threats to Koalas including habitat loss, fragmentation and degradation of wildlife and climate refugia corridors, so necessary for wildlife survival in this time of climate emergency and biodiversity decline¹⁴, disease related to stress and dislocation, declining genetic diversity, and increased likelihood of vehicle strike.

In full consideration of the Biodiversity Conservation Act¹⁵, the Project does not avoid impacts on the Koala and other subject threatened species.

Port Stephens and MidCoast Councils have received substantial funding from the NSW Government as part of the Koala Strategy which aims to double NSW's Koala population by 2050. If the Department refuses to recognise that the threats to our regional Koala population will be exacerbated by projects like Deep Creek Quarry, then we are just wasting community and Council resources and NSW taxpayers' money investing in Koala conservation.

Traffic Assessment

Photo of Bucketts Way Intersection https://www.google.com/maps/@-32.6525932,151.8661767,3a,90y,90h,89.64t/data=!3m6!1e1!3m4!1siWPPNsYYkiH0esUATryag!2e0!7i16384!8i8192?entry=ttu

The possibility of up to 50 haulage truck movements per hour per day is a lot to get your head around ¹⁶. That, plus the cumulative impacts from surrounding quarry developments, will significantly worsen the problems of the Bucketts Way and Pacific Highway intersection - an important and essential regional intersection that is already considered unsafe by MidCoast Council and our Federal MP.¹⁷.

The Bucketts Way is designated as a tourist drive and a recognised critical detour route when closures to the Pacific Highway occur¹⁸.

Many campers and caravans use the Bucketts Way to access Gloucester and the Barrington Tops particularly during holiday periods. Slow moving caravans and quarry haulage trucks are a recipe for disaster especially when road conditions are not fit for purpose.

Haulage trucks using the slip lane to exit onto Bucketts Way, impede a clear line of vision for vehicles waiting to cross the Highway to travel south. This causes delays, frustration and line

¹⁴ https://soe.dcceew.gov.au/overview/environment/biodiversity Australia State of the Environment 2021 Biodiversity

¹⁵ https://legislation.nsw.gov.au/view/whole/html/inforce/current/act-2016-063

¹⁶ Point 224 p50 Deep Creek Quarry Assessment Report

¹⁷ See attachment 3 – media reports https://www.newcastleherald.com.au/story/8247840/quarry-plans-revive-calls-for-new-overpass-at-medowie-road/

https://www.gloucesteradvocate.com.au/story/8098760/midcoast-council-pushes-for-the-bucketts-way-overpass-on-pacific-highway/

¹⁸ <u>https://hdp-au-prod-app-midcst-haveyoursay-files.s3.ap-southeast-</u>

^{2.}amazonaws.com/1616/2520/8418/Attachment C Transport Background Report.pdf see attachment 4

up at the intersection. It is also distracting – the intersection services a right turn lane for south bound vehicles.

Proposed quarries south at Italia Road, will add 1000 + haulage trucks travelling north to Tarean Road at Karuah, u-turn and return south on the Pacific Highway, joining haulage trucks from Karuah East Quarry and possibly the proposed Karuah South Quarry. The Karuah East and proposed Karuah South Quarry trucks will return north, adding to the Italia Road truck numbers passing the intersection.

Deep Creek's trucks will have to traverse across oncoming haulage trucks travelling at 100 kmph and then join those 1,000+ haulage trucks travelling south at 100kmph.

There is no acceleration slip lane heading north from Bucketts Way onto the Pacific Highway – however, when the traffic is dense and the line up at the intersection is long, locals use this route, executing a U-turn at Karuah to head south.

Earlier this year MidCoast Council called for a full upgrade of the intersection complete with overpass. The Project should not be approved until the Bucketts Way intersection is made safe to accommodate current traffic, let alone increased numbers of haulage truck movements.

It is likely motorists will avoid the intersection altogether, choosing a longer route for south bound journeys via Dungog and Maitland or the Gloucester to Nabiac route onto the highway, with the result of increased traffic on local roads, increased travel times, community angst and subsequent demands on Council to improve local roads.

The DPE has irresponsibly failed to assess the traffic impacts of the Project. (see attachments) The Project will never gain community approval whilst the necessary road infrastructure that ensures community safety is not in place prior to Project establishment.

CONCLUSION

The life of a hard rock quarry is around 30 plus years – with expected modifications and extensions typically extending the quarry's footprint. As a matter of course, quarries change the landscape and character of environments for ever.

The Project presents inherent risks that will be exposed over time – to our natural environment, our social amenity and safety and our local rural and tourism economy.

In the absence of strategic and regional planning for quarry development that justifies Deep Creek Quarry's approval, and which reflects the economic considerations of the cumulative impacts of such development on rural communities, we believe the Project should be refused.

Megan Benson megabens@gmail.com
Committee Member, Gloucester Environment Group.

Attachments

ATTACHMENT 1

Nearby operational quarries include:

Martins Creek Quarry at Paterson – currently before to courts to dispute IPCN refusal – proposal for up to 1.1 Mtpa over next 25 years

Brandy Hill Quarry – Production increased from 700,000 to 1.5 tpa in 2020 for further 30 years

Boral/Seaham Quarry at Balickera –preparing EIS to **double current output** to 2Mtpa for 30 more years

Karuah East Quarry – currently operational and extended (2020) – 1.5Mtpa over 20 years Holcim Jandra Quarry – Possum Brush (Taree) Modification 5, 2016 475 tpa over 30 years Willow Tree Quarry at Willow Tree – 490 tpa continued operation over last 20 years (with proposed expansion to 750,000tpa over next 25 years)

Other nearby Proposed quarries include:

Hillview Quarry at Booral – and Concrete batching plant - preparing EIS 750,000 tpa over 20 years

Stone Ridge Quarry at Balickera – preparing response to submissions 1.5Mtpa over 30 years

Eagleton Quarry at Balickera -preparing amendment report 600,000 tpa up to 30 years

Karuah South Quarry – assessment pending – 600,000 tpa over 25 years

Focono Quarry at Singleton – 1 Mtpa for 30 years preparing EIS

Deep Creek Quarry at Limeburners Creek – 500,000tpa over 30 years

ATTACHMENT 2

MIDCOAST Economic Development strategy 2023-2028

OUR REGION - AN OVERVIEW

Home to over 97,000 people, the MidCoast offers our diverse community a wide range of economic and lifestyle opportunities. The MidCoast contains 195 towns, villages and localities. Spanning an area of 10,052 km2 MidCoast Council is the largest Council area in the Hunter covering 30.5% of the region and 1.25% of NSW. It is a large and diverse area, ranging from beaches and coastline to mountains and hinterland, with green spaces and National Parks in between. This landscape is characterised by pristine waterways, striking scenery and an abundance of natural treasures.

Visitor Economy

Offering a wide array of events and experiences in a diverse landscape, the MidCoast region (marketed as the Barrington Coast) receives over 2.3 million 10 visitors every year. In the 2021-22 financial year, tourism generated \$608 million towards the economy.

Natural Environment

The MidCoast is home to extensive diversity in its natural environment. This environment provides ecosystem services and resources that are valuable to our economy. Quality management and enhancement of our landscapes provides amenity and recreation, liveability and wellbeing. Sustainable growth and prosperity can be achieved by encouraging the business community to understand and embrace the relationship between the economy and the environment as an economic driver.

ATTACHMENT 3 Media reports (p 8-11)

Quarry plans revive calls for new overpass for Medowie Road, Italia Road, Bucketts Way Newcastle Herald Michael Parris June 27, 2023



Two men died in a horror collision between a truck and a car on the Pacific Highway at Ferodale in 2019.

Federal MP David Gillespie says plans for three large quarries north of Raymond Terrace demonstrate why the Pacific Highway urgently needs a new interchange to fix safety concerns at Italia Road, Medowie Road and the Bucketts Way.

The *Newcastle Herald* reported last week that <u>three proposed quarries</u> at Balickera could generate 1000 truck movements a day.

The former federal government budgeted \$9 million in 2021 for an Italia Road overpass, but Dr Gillespie, the Nationals Member for Lyne, said the project had not materialised.

He said an interchange could include slip roads from Italia Road and the Bucketts Way connecting to an overpass at Medowie Road, eliminating three dangerous intersections where cars cross high-speed traffic.

Two men died at the Medowie Road intersection in 2019.

Dr Gillespie said in a speech to Parliament in 2021 that the NSW government should fast-track the Medowie Road flyover and overpasses at other dangerous intersections between Newcastle and Port Macquarie, including the Myall Way turn-off to Hawks Nest and Tea Gardens.

"The Italia Road highway overpass project is long overdue, as these quarry developments have highlighted," Dr Gillespie said on Monday.

"This is yet another case of poor planning and too much red tape by the NSW government which has failed to deliver these projects. They always drag the chain."

The quarry companies involved in the Balickera projects have reached an agreement with Transport for NSW for trucks to turn north from Italia Road, travel 11 kilometres up the Pacific Highway to Karuah then turn around to travel south back towards Newcastle.

Mr Gillespie described this plan as "ridiculous", though the quarry projects were "certainly welcome" to supply materials for building and maintaining roads.

"Transport for NSW needs to immediately complete the planning for these highway overpasses ... so that works can begin as soon as possible," he said.

"They are critical for our economy, important for road safety, and they are all long overdue."

Million dollar upgrade has not addressed safety and traffic problems Gloucester Advocate Jeanene Duncan March 6 2023

MidCoast Council pushing for overpass at the intersection of The Bucketts Way and Pacific Highway at Twelve Mile Creek. Picture Google Maps



Councillor Katheryn Stinston believes MidCoast Council should continue to push for an overpass at the intersection of The Bucketts Way, Pacific Highway.

Addressing fellow councillors earlier this week at the MidCoast Council February ordinary meeting, Cr Stinston believed other high risk roads in the LGA (local government area) feeding onto the Pacific Highway, Failford Road and Myall Way, also should be upgraded to a full overpasses.

The Bucketts Way is a vital regional road, it provides an important transport link for freight, passing motorists, visitors and residents, Cr Stinson said.

She said the intersection often becomes congested resulting in lengthy waiting times for traffic turning south onto the highway.

Under the Safer Road Program \$1.4 million of roadworks were completed at the intersection in early 2021

"However, the completed road works did not address the volume of safety concerns raised by residents."

In a letter to council in September 2021, Deputy Premier Paul Toole said work undertaken by the State government had met requirements.

But, Mr Toole also said The Bucketts Way has been included in the list of intersections to be considered for upgrade and prioritisations as part of the Pacific Highway Future Growth Program.

"Whilst the intention to provide an overpass and interchange at Harrington was announced during 2022, there has been no indication of similar projects at other high risk highway intersections such as The Bucketts Way, Myall Way and Failford Road.

"There has been no further information available on the Pacific Highway Future Growth Program.

Cr Stinson said a route development strategy for The Bucketts Way had been in place since March 1999.

Councillors agreed a letter should be sent to both sitting and shadow State MPs asking for an update on the Pacific Highway Future Growth Program and calling for a full upgrade of the intersection complete with an overpass.

ATTACHMENT 4

MidCoast Rural Strategy Transport Background Report Version 4 / Date: July 2020

5.2.2 The Bucketts Way

The Bucketts Way (comprised of The Bucketts Way South and The Bucketts Way East) is a regionally significant two-lane road corridor of approximately 160km that connects several regions and towns. With links to Thunderbolts Way at Gloucester, it is a key freight route linking the Northern Tablelands through the MidCoast to the Port of Newcastle.

It also connects the towns of Gloucester, Taree and Stroud and the villages of Barrington, Krambach and Stratford to the Pacific Highway for inter-regional travel. A renowned tourist drive, The Bucketts Way, provides access to the Barrington Tops and other nature-based destinations such as the Devil's Ark conservation site and passes through many historic village settlements.

RMS classifies The Bucketts Way as gazetted Regional Road 101 comprising of MR90 and Gloucester - Taree Road MR192. The RMS Regional road description excludes the link between Taree and Krambach where instead, the classification includes the link between Krambach and Nabiac comprising of Avalon Road.

The Bucketts Way is zoned the same as the adjoining land and in non-urban areas is primarily zoned RU2 Rural Landscape from Limeburner's Creek to Craven, and RU1 Primary Production and E3 Environmental Management from Craven through to Thunderbolts Way, north of Gloucester.

The Bucketts Way is generally considered to be in poor condition and does not meet current transport needs. Community, industry and government bodies frequently identify The Bucketts Way as a candidate for funding and road upgrades due to its significance as a road corridor.

\$8.4 million in funding has been announced to deliver The Bucketts Way Access Strategy as part of the NSW Government 'Fixing Country Roads' funding program34. NRMA has also identified the Bucketts Way, from Twelve Mile Creek to Gloucester, as requiring continuing upgrades in their 2018-2019 budget submission35.

Due to the lack of a suitable detour to the east The Bucketts Way also serves as a critical detour for Pacific Highway traffic where any closures occur on the Pacific Highway between Limeburner's Creek and Nabiac.

Freight

Agriculture, forestry and mining industries all rely on The Bucketts Way to transport goods between towns, regions and transport hubs such as the Port of Newcastle. Beef and dairy

are important regional industries and the saleyards on The Bucketts Way at Gloucester, continues to provide a regional meeting place for producers36.

Timber harvesting occurs in local NSW State Forests, accessed via The Bucketts Way, and product from this industry is transported to the Port of Newcastle for export. Poultry farming is concentrated in the Stroud Valley as the area suits the requirements for chicken grow-out farms and this industry is heavily reliant on efficient freight connections to processing facilities37.

Extractive industry and quarry products are also carted along The Bucketts Way. As with Thunderbolts Way, the poor condition of The Bucketts Way is a barrier to the growth of these industries 38.

Existing transport limits along this road only allow for 19 metre B-Double heavy vehicle access rather than full size 26 metre B-Double access. The current weight and size restrictions increase transport costs for industries that rely on high volume transport such as timber, beef and poultry. These transport costs reduce local producer's abilities to stay competitive in the broader market.

Improving heavy vehicle access along The Bucketts Way to accommodate 26 metre BDouble vehicles will provide opportunities for growth in these sectors and, more broadly, is likely to grow the logistics and freight industries in the region.

Tourism

The Bucketts Way is one of three numbered tourist drives in the MidCoast. It is recognised as Tourist Drive 2, the second oldest tourist drive in NSW. As it provides a scenic loop with access to the Pacific Highway at both ends, it is popular to both day-trippers and longer-term tourists visiting the area.

Key attractions include access to the Barrington Tops National Park, the Barrington River and the towns and villages that line The Bucketts Way including historic Stroud and the scenic villages of Krambach and Tinonee. Gloucester also serves as a base for those engaging in outdoor activities such as kayaking or mountain biking.

Tourist signposting along The Bucketts Way to key destinations such as the Barrington Tops National Park should be a priority action to enhance the tourist experience along the popular tourist drive and to tell the story of the area. Signposting for the Barrington Tops National Park has caused some confusion with visitors and may need to be addressed 39.

Tourist and visitor traffic share The Bucketts Way with a variety of other traffic including agricultural produce freight, school transport and daily commuters.

This variety of traffic, in combination with the poor road condition, creates unsafe road conditions with speeding, overtaking and pedestrian safety of key concern40. Given that The Bucketts Way is a main tourist route in the MidCoast, improving road conditions such as providing more overtaking lanes, should be prioritised to reduce the safety risks associated with tourists driving slowly along important road corridors.

Key Management Outcomes to Consider

Supporting The Bucketts Way's use as a state significant freight route and an important heavy vehicle corridor for local industry.

Recognising The Bucketts Way's role as a numbered tourist route that serves as the 'gateway' to the Barrington Tops and Gloucester area, which is a popular tourist area.

Recognising that The Bucketts Way serves as an important road corridor for a variety of road users which has implications for road safety.

Recognising The Bucketts Way as a critical detour when closures to the Pacific Highway occur.

Recognising Avalon Road between Krambach and Nabiac as a crucial link for The Bucketts Way to the Pacific Highway.

Challenges

The restricted heavy vehicle access which currently only accommodates 19 metre B-double vehicle access.

The road is in poor condition and unsafe in areas, although the standard is increasing.

Opportunities

The corridor is a renowned tourist drive with high scenic amenity that provides access to the Barrington Tops and other nature-based tourism activities such as mountain biking and kayaking.

It is the fastest and shortest route linking urban settlements in the Northern Tablelands to Sydney and Newcastle, including the Port of Newcastle and Newcastle Airport.

Recommendations

Prevent ribbon development and preserve the scenic amenity and rural landscape along The Bucketts Way recognising its importance as a tourist drive.

Improve access and safety for all vehicles using The Bucketts Way.

Consider road infrastructure investment including signage and road upgrades to enhance access and experience to key tourist attractions such as the Barrington Tops National Park, this may involve consulting with TASAC to determine eligibility for tourist signposting for key tourist destinations.