

Submission to IPC .

Re: Deep Creek Quarry SSD – 11591659

Please accept this submission outlining the reasons for our **objections**.

It is written on behalf of VOWW (Voice of Wallalong and Woodville), a not-for-profit community organisation, in support of the community that will be affected in the area surrounding the Deep Creek quarry project site.

My name is Margarete Ritchie, and I am president of VOWW. Since 2014 I and my community have been involved in writing submissions against the creation or expansion of quarries in this area. This has involved visiting sites, speaking to residents, listening to concerns, giving advice when asked, researching issues such as road standards, 'best practice' quarry management, solastalgia, reading thousands of pages of EISs, conclusions and reasons given by the DPE. And the list goes on. And of course, I write from the experience of living on Brandy Hill Drive, the primary Hanson Brandy Hill quarry haulage route.

The main issues I will be addressing in this submission are:

- **transportation of quarry product**
- **lack of a strategic plan for quarries in this area.**

It has become quite obvious over the past 9 years that the creation of new quarries and the expansion of existing ones is an ad hoc process. There is no local nor regional plan and the consequences for all residents in a wide area are all negative.

The quarries are:

- Brandy Hill quarry - 1.5 Mtpa (operational)
- Martins Creek quarry - 1 to 1.5 Mtpa. (depending on which part of the EIS you read). (Proponent has appealed the IPC decision and now before the Land and Environment Court).
- Boral Seaham, Eagleton - 2 Mtpa (in process of preparing EIS for expansion).
Currently operational
- Stone Ridge, Balickera - 1.5 Mtpa. Preparing EIS.
- Eagleton quarry, Eagleton - 600,000 tpa.

(The 3 quarries above are either side of Italia Rd and within 1 km of each other)

- Karuah South - 600,000 tpa. (EIS stage complete.)
- Karuah East -1.5 Mtpa. Operational.
- Hillview Stroud - 750,000 tpa. Preparing EIS.
- Deep Creek, Limeburners Creek/Allworth – 500,00 tpa.

There has been no strategical planning, and each quarry proposal has been assessed as a stand-alone proposal.

The cumulative and combined effects of dust and diesel emissions of the haulage trucks has great consequences for a much wider community than just the individual communities around each quarry. In fact, there are issues of CO² emissions that will have an impact on the NSW State government targets to reduce these emissions to address climate change and the liveability scores for the population.

The research article: "Trucks are Smashing Up the Roads", written by Allan Whiting, Nov 8, 2023, draws our attention to the transport pollution caused by trucks transporting goods on major and regional roads in Australia. It refers to the cumulative pollution in and around major cities, however, it is just as relevant to our area with up to 5000 quarry trucks per day expected to use the Pacific Highway, should all quarries being assessed be approved. Deep Creek quarry will be contributing to this number.

.....Inadequate laws, along with government inaction, are contributing to an estimated 11,000 Australian premature deaths from transport pollution every year, according to a late-2023 report released by the Environmental Defenders Office.

.....The report Toxic Transport: How Our Pollution Laws Are Failing to Protect Our Health found that Australian governments are failing to set targets and monitor air pollution that meet the World Health Organisation (WHO) air quality guidelines. As a result, there is an absence of measures to protect people from air pollution from transport.

Therefore, the residents who are complaining about diesel fumes and bleeding noses have a right to be concerned.

The EIS report written by Wedgetail on behalf of Ironstone/ Deep Creek proposal does not address these issues at all. In fact, when challenged by neighbouring residents on the issue of diesel emissions, the response was that there are already such emissions from other traffic using The Bucketts Way. In other words, the cumulative and combined effects have been ignored.

The other major problem with quarry road haulage is the damage that is done to the pavement.

In the SIA Addendum provided by the Ironstone principal advisor 6/11/23, the answer given to: "*Concerns over increased heavy vehicle traffic and its effects on the intersection with the Pacific Highway.*" is

*"Ironstone Developments will develop and implement management controls to reduce the effects of increased traffic on The Bucketts Way, including a **Driver Code of Conduct** and Traffic Management Plan."*

The residents who live along the haulage route from Hanson's Brandy Hill quarry know that a driver code of conduct works for the quarry's fleet drivers but isn't worth the paper it is written on for some of the contractors who transport most of the material. Every day compression braking and poorly maintained trucks with squealing brakes are a serious issue to the mental health of residents. It causes anger, depression and adds to a negative

interaction with the quarry due to constant complaints. Even with 6 large signs reminding drivers to avoid compression braking in the residential area of Brandy Hill and Nelsons Plains, drivers ignore this basic request that means so much to the wellbeing of residents. Quarry management has stated in CCC meetings and when residents lodge complaints, that once a subcontractor leaves the quarry Hanson has no way of controlling driver behaviour.

“Concerns over the potential negative impacts on the condition of The Bucketts Way, noting some existing sections were considered poor during the consultation and submission period.”

And the answer given:

“Substantial portions of The Bucketts Way between the Quarry entrance and the Pacific Highway have been or are currently being upgraded.

Ironstone Developments have committed to paying a levy for the maintenance of the The Bucketts Way for the life of the quarry.”

Noting how expensive road maintenance is, over the life of the quarry the amount offered may provide some road patching but nothing more. The combined effect of damage done by quarry haulage trucks that will use The Bucketts Way needs to be quantified. There has been much research done into the damage done to a road surface by a B-double compared to a car. In fact, the article mentioned above (Trucks are Smashing up the Roads) uses an equation that is used by road authorities the world over. A summary of the conclusions:

“..... that gets much worse when you consider that the passage of a car over a certain piece of pavement involves only two axles, where the B-Double has nine, so the real-world effect is $2401 \times 9/2 = 10,804$ times more damage, in the case of the B-Double.”

A typical quarry haulage configuration is truck and dog with 6 axles so using the above equation,

1 quarry haulage truck and dog does 7,213 times more damage to a road surface than a car.

“Other typical example includes ‘rutting’, where truck tyres deform asphalt surfaces and depressed and broken road edges.”

This is very common on rural roads such as The Bucketts Way and looks like the road surface is “squished” close to the white line marking near the verge.

Deep Creek will add 220 trucks (at peak) and combine with the trucks transporting gravel from the Hillview quarry (approximately 300) and also with some from Karuah South.

None of the proponents for these 3 quarries believe that their truck numbers will make any difference because the road has capacity. Yet, it is obvious to residents and other travellers alike that The Bucketts Way is struggling to cope with the vehicle numbers wishing to turn onto the Pacific Highway. The cumulative and combined impact of over 500 truck movements per day will add to travel times of commuters, tourists and residents. It will also

add to the frustration and risk at that intersection as drivers may make unwise decisions and make the turn across a major highway when it is unsafe to do so. TfNSW came to the same conclusion.

Both Port Stephens and Midcoast councils will benefit from the road maintenance levy that Deep Creek quarry will pay. However, as mentioned before, if the pavement fails as it has around Brandy Hill, or it doesn't meet AustRoads standards and requires major upgrades, this will NOT be covered by the levy.

The modelling of transport of quarry product from Deep Creek quarry ends at the intersection with the Pacific Highway. It makes bold predictions that the highway has plenty of capacity and does not take into account the cumulative and combined effect of the other quarry trucks and general traffic that use with the Pacific Highway. At peak there will be close to 5,000 haulage trucks/day, on a notoriously congested highway from Raymond Terrace to the Hexham Bridge over the Hunter River.

A dangerous pinch-point is the Heatherbrae round-about. Perhaps the proponent and the consultants don't drive on this section of road often enough to appreciate the concerns that local road users have. At peak hour and during holiday times, and the shoulder period to holiday times, the highway can be congested for kilometres in both directions. In fact, the truck drivers from other quarries as well as the general travelling public, have learnt to look up Google Maps and use minor roads to avoid the Pacific Highway and the New England Highway. As a consequence, **All** local roads, as well as the highways are now congested. Deep Creek quarry drivers will no doubt do the same irrespective of the directions given by quarry management to use only haulage routes specified. Combined with other quarry trucks this will become even more of a nightmare for rural road users. To my knowledge, this has NEVER been mentioned or modelled in any EIS or noted by DPE, for any quarry in the area. The more quarries like Deep Creek that get approved by the DPE the worse the situation will become.

Community Issues.

Whenever I have spoken to residents of the Limeburners Creek community I have noticed the 'grief' in their demeanour, in their voices. They are suffering from solastalgia – they are losing something that is precious to them. Their environment will change and for some, that is their reason for living.

With uncertainty comes anxiety and depression. These are well recognised effects on health and well-being.

Kleinfelder, the writer of the SIA does not believe that this is an issue.

*This SIA concluded that the negative social impacts are primarily associated with the **potential** change to way of life and not knowing how the **potential** impacts will be experienced.*

Every effort should be made by the proponent to mitigate these potential/perceived impacts.

The associated key impacts include:

- *Positive economic outcomes, providing business and job opportunities for the community through construction and operation*
- *How the project communicates and engages with the community*
- *Noise, dust and blasting resulting from the operation and from the access road*
- *Change to the peaceful way of life in a rural residential area*
- *Changes to the amenity and environmental values.*

The positive economic outcomes...may not be of any benefit to the closest residents and I am surprised by its inclusion in this evaluation. All other issues mentioned are extremely important to the residents of this community.

- Dust, noise and blasting will have an impact on physical health.

One added noise disturbance not brought into calculation is the arrival of haulage trucks to be loaded and dispatched from 6am. In fact, 6am on Saturday mornings would probably see most residents still asleep.

Loading and dispatch of product trucks: • 6:00am to 6:00pm Monday to Friday, 6:00am to 1:00pm Saturday

This means that empty trucks will be arriving before 6am and as already stated, empty trucks potentially make more noise than those fully laden, depending on the condition of the road. The mandatory reversing beepers that can be heard at quite a considerable distance would also be an unwelcome disruption early in the morning.

- **Will there be any monitoring of the dust particles on the roofs of nearby houses and in the water tanks?**

Increasingly residents are installing solar panels on their roofs. These will need to be kept clear of dust to work efficiently.

Dust also settles in swimming pools and dams. Dams are a source of water for stock and frogs are an integral part of the ecosystem in rural areas. The potential for extra dust rich in silica and other minerals could have an environmental impact not yet modelled.

Rhyolite is an extrusive, silica-rich igneous rock. (ThoughtCo – Science, Tech, Maths)

‘Best practice’ dust and noise suppression includes containment of all crushers and machinery. Even though the proponent states that the ridgelines will contain noise and dust, that may not be the case depending on a variety of factors such as atmospheric conditions.

- Noise and blasting could influence the mental health of residents. The Brandy Hill community has the lived experience of these effects with ongoing concern and health issues.
- Every time there is a blast the community will be reminded of the peaceful community it has lost.
- The character of the area will change with yet another quarry in the area already dotted with so many others.

Some of the key mitigation measures include:

- *Developing an effective inquiries and complaints process which is promoted through communication channels.*

What changes will be made after a complaint is made? It is well and good to have a complaints process but there must be a suitable outcome for the complainant.

- *Compliance monitoring **may** be required as part of the conditions of approval.*

Should this not be a pre-requisite for quarry approval? **May be required?**

- *Findings of monitoring will be presented at community meetings such as a consultative committee and is an opportunity to review and improve operations.*

And what if the operations of the quarry cannot be changed to address any negative findings of the monitoring? Will the quarry close until an answer has been found?

- *An inquiries and complaints process will be developed to manage and respond to community feedback.*
- ***the quarry presents a change to the community, social impacts can be managed. It is likely, if approved, the proponent may be required to submit a social impact management plan (SIMP) for approval as part of the conditions of consent.***

Finally, an admission that the quarry will make a change to the community! Up until this point the change has always been described as “perceived”.

Again, the use of the term “**may**”. **It should be a mandated condition of consent.**

The response to the requirements to address **climate change and intergenerational equity** is very simplistic. The lighter coloured roads, and much is made of the properties of this particular type of rhyolite, seems to be the only contribution. It only affects the ‘micro-climate’ of a particular area where this product may be used and will have absolutely no reduction of greenhouse gas warming. In fact, the quarrying operations and transport emissions will contribute to greenhouse gas warming.

Conclusion.

- Deep Creek Quarry should not be given approval on the grounds of the transport issues mentioned in this report.

- Pollution from diesel emissions must be considered as a health hazard, not just for the nearby residents, but also for all other road users. I believe a tipping point has been reached. As stated in the report from Allan Whiting:

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- Unless research is done to source and use other products for road and other infrastructure projects, any location with a seam of rock deemed suitable will be at risk of being mined by the quarrying industry.
- Quarry rock is a finite resource. Other countries are recognising this and are already using other materials for roads and concrete.
- The quote below from <https://www.quarrymagazine.com/2023/12/15/infrastructure-australia-releases-2023-market-capacity-report/> , while highlighting the problems faced with a shortage of labour and supply for some of the new infrastructure projects, shows that the industry is indeed looking for alternatives. This could see quarries such as Deep Creek becoming redundant as the market will start to demand more environmentally friendly products.

“Australia has an opportunity to build domestic capacity and markets for new low emissions construction materials, such as recycled materials. For major road projects, our modelling suggests that close to a third of conventional materials – 54 million tonnes annually – could be replaced with recycled materials,”.

- While new quarries are being approved the need to do urgent research into alternatives to quarry gravel will stall.
- Greenhouse gas emissions /climate change has not been adequately addressed in the EIS.
- Dust has not been addressed fully.

For all of the above reasons we are strongly opposed to the development of this quarry at Deep Creek.

Margarete Ritchie.

Brandy Hill.

President. VOWW.