



NAME REDACTED

OBJECT

Submission No: 194287

Organisation:	<p>Key issues: <i>Biodiversity impacts, Impacts on koala habitat, Air quality, Noise and vibration, Blasting impacts</i></p>
Location: <i>New South Wales 2446</i>	
Submitter Type: <i>an individual making a submission on my own behalf</i>	
Attachment:	

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I submit this formal objection to the Sancrox Quarry Expansion Project (SSD # 7293). My objections are based on significant concerns regarding the proposed project's potential impacts on socio-economic factors, traffic management, ecological integrity, and noise pollution. I urge that these issues be given due consideration and that the proposal be either substantially amended or rejected in its current form.

1. Groundwater Impacts

My principal concern pertains to the project's likely adverse effects on local groundwater resources, including bore water supplies critical to the surrounding community. The Environmental Impact Statement (EIS) provided by the proponent fails to adequately assess the potential degradation of these vital resources.

Mining operations, particularly those involving quarrying, have well-documented impacts on groundwater systems. These activities can lead to the lowering of water tables, contamination from the introduction of pollutants, and disruption of natural groundwater flow patterns. The extraction processes can create pathways for contaminants, such as heavy metals, to migrate into aquifers, posing serious risks to water quality. Additionally, the removal of large quantities of overburden and rock can result in increased sedimentation and turbidity in groundwater supplies, which could adversely affect both human consumption and agricultural use.

Moreover, the Sancrox region is particularly vulnerable due to its close proximity to the Hastings River. The proponent's mitigation measures consisting primarily of monitoring and vague remediation plans are grossly insufficient given the potential for long-term and possibly irreversible harm to the aquifer. The EIS also fails to adequately consider the cumulative impact of this project in conjunction with existing and future developments in the area, which could exacerbate the stress on groundwater resources.

Given the gravity of these risks, we argue that the precautionary principle must be applied, requiring a halt to the project unless and until these issues are conclusively resolved. The proponent has not provided sufficient assurance or detailed contingency planning to address potential groundwater contamination or depletion. Without robust, enforceable measures in place, the project should not be allowed to proceed.

2. Social and Economic Considerations

The project's Social Impact Assessment (SIA) presents a series of fundamental shortcomings that must be addressed.

Firstly, the SIA fails to account for the full extent of the disruption to local land use and the associated devaluation of property. The quarry's expansion will likely lead to a shift from rural residential and agricultural land use to industrial, fundamentally altering the character of the area. The transition from a predominantly rural landscape to an industrial zone could lead to significant depreciation in property values, with long-term economic consequences for residents.

Secondly, the assessment of social benefits is speculative and lacks empirical grounding. The purported job creation and economic uplift are overstated, particularly when balanced against the economic dislocation



caused by decreased property values, potential loss of agricultural productivity, and the decline in local tourism—an industry that thrives on the area's natural beauty and tranquillity.

Moreover, the mitigation strategies proposed are insufficient. The SIA does not provide a comprehensive plan to address the potential increase in community tension or the strain on local infrastructure, including schools, healthcare facilities, and emergency services. The influx of workers during construction and operation phases could overwhelm these services, leading to a decline in the quality of life for residents.

3. Traffic Management and Safety

The proposed expansion anticipates a significant increase in heavy vehicle traffic, with estimates nearing 800 truck movements daily. The implications of such an increase are both immediate and long-term.

From a road safety perspective, the existing infrastructure is ill-equipped to handle the projected traffic volumes. The local road network, particularly the rural roads leading to and from the quarry, was not designed for high-frequency heavy vehicle use. The sharp bends, narrow lanes, and lack of adequate signage or lighting on these roads compound the risk of accidents, particularly involving vulnerable road users such as cyclists and pedestrians.

Additionally, the increase in heavy vehicle traffic will accelerate wear and tear on the road surfaces, leading to higher maintenance costs and potentially dangerous road conditions if these are not adequately addressed. The proponent has not provided a detailed plan for the maintenance and upgrading of roads that will bear the brunt of this increased traffic. The absence of such a plan suggests a significant oversight in the project's feasibility and safety planning.

Further, the environmental impact of increased traffic must be considered. The rise in vehicle emissions will contribute to air pollution, negatively affecting both the local environment and the health of residents. Noise pollution from the constant movement of heavy vehicles will disrupt the community's peace, potentially leading to increased stress and health issues among residents.

4. Ecological Integrity

The ecological assessment provided by the proponent is critically inadequate in several key areas. The assessment lacks a thorough examination of the cumulative environmental impacts on local flora and fauna, particularly in light of the existing pressures from recent bushfires and ongoing land development.

One of the most concerning omissions is the impact on koala populations, which are already under significant stress due to habitat loss. The proponent's assessment does not sufficiently address the potential for habitat fragmentation, which could further isolate koala populations and reduce their chances of survival. The destruction of native vegetation, particularly key food sources for koalas, is likely to exacerbate the decline of this vulnerable species, right when there is a significant and new very local breeding program occurring.

Moreover, the project poses a significant threat to other protected species and biodiversity in the area. The environmental management plans proposed by the proponent are vague and lack enforceable commitments. There is a failure to identify specific areas that will be protected or rehabilitated and a lack of clear guidelines on how biodiversity offsets will be managed and monitored.

The proposal also fails to consider the broader ecological network, including the connectivity of habitats and the role of the Sancrox region as a wildlife corridor. The disruption of these corridors could have far-reaching impacts, affecting not only local species but also the broader regional ecosystem.

5. Noise Pollution

The noise impact assessment presented by the proponent raises several red flags, particularly concerning the methodologies used and the mitigation measures proposed.



The noise modelling provided in the EIS appears to underestimate the potential noise impacts on the local community. The modelling does not fully account for the cumulative effects of multiple sources of noise, including quarry operations, heavy vehicle movements, and blasting activities. The use of average noise levels in the assessment does not accurately reflect the peak noise events that are likely to have the most significant impact on residents.

Furthermore, the proposed noise mitigation measures are both impractical and likely unenforceable. The suggestion of acoustic barriers fails to consider the topographical challenges of the area and the potential for noise to travel across valleys and amplify in certain weather conditions. The limitations on operational hours, while a step in the right direction, do not adequately address the impact of early morning or late evening operations, which are likely to be particularly disruptive.

The proponent also fails to consider the long-term psychological and health impacts of chronic noise exposure on the local population. Studies have shown that prolonged exposure to elevated noise levels can lead to increased stress, sleep disturbances, and cardiovascular issues. The lack of a comprehensive, long-term noise management plan suggests a significant oversight in the proponent's responsibility to protect public health.

Conclusion

In light of these substantial concerns, we respectfully submit that the Sancrox Quarry Expansion Project (SSD 7293) poses significant and unresolved risks to public health, safety, and the environment. The deficiencies in the EIS, coupled with the proponent's failure to provide adequate and enforceable mitigation measures, necessitate a reconsideration of this project's approval. I urge the commission to reject the current proposal or, at the very least, impose stringent conditions that address the substantial risks identified herein.

I appreciate your attention to this matter and are prepared to provide further evidence or clarification as required.
