



Blue Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: (02) 4757 1872 - E-Mail: bmcs@bluemountains.org.au

Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

7 February 2019

General Manager
Lithgow City Council
PO Box 19
LITHGOW NSW 2790

Dear Sir/Madam,

Submission as an objection to DA294/18 - Proposed Rehabilitation of Bell Quarry

Blue Mountains Conservation Society is a community organisation with over 800 members working to preserve the natural environment of the Greater Blue Mountains. The Society's area of interest encompasses the Greater Blue Mountains World Heritage Area which includes Wollemi National Park and the Blue Mountains National Park.

The aims and objectives of the Society include to promote the need for ecological sustainability and to actively oppose those human activities which degrade or destroy the natural environment.

The Blue Mountains Conservation Society (BMCS) advocates that Lithgow Council refuse DA294/18.

Our Society believes that the DA in its existing form would not, on balance, contribute to ecological sustainability and that there is a very significant risk of degrading or destroying parts of the natural environment in the proposal.

OUR REASONS FOR ADVOCATING REFUSAL:

The applicant refers in Volume 1 of the applicant's EIS to the Protection of the Environment Operations (Waste) Regulation 2014 (2014 Waste Regulation) and to orders and exemptions being appropriate only if the reuse of waste material"

Is genuine, rather than a means of waste disposal

Is beneficial or fit-for-purpose, and

Will not cause harm to human health or the environment

There is a very considerable possibility, over the years which this DA would be implemented, that it would fall well short of meeting any of these three criteria.

IS THIS ANY MORE THAN A WASTE DISPOSAL STRATEGY?

Ecological sustainability requires that communities be substantially maintained by using, to the maximum extent possible, resources sourced within their own district or region and generally producing waste products that can be disposed of within their own district or region. The applicant's claim that the allegedly clean waste products that will be used to fill the voids on this

site are from within this region is a very loose use of the term “region”, given the vague but disturbing information supplied about the wide geographical distribution of the sources of the fill.

Sydney and already large coastal regions to its north and south are growing in population. Lithgow and local government areas immediately adjoining Lithgow have much to fear from proposals to dispose of waste products from Sydney and other coastal regions within these inland local government areas. In particular, it is dangerous to set a precedent that waste could be transported from highly geographically dispersed sources over a large number of years, which is the intention of this DA.

This DA proposes road transport of the waste and there are substantial risks of the waste material being dispersed into natural and urban environments along the routes through atmospheric dispersal of particles, poorly secured loads or crashes.

IS THIS BENEFICIAL OR FIT-FOR-PURPOSE?

During the years since quarrying ceased at this site, some gradual natural regeneration has occurred. To regard this DA as beneficial, the advantages to the natural environment would have to outweigh the interruption of the currently occurring regeneration and the risks of harm rather than improvement from the waste deposition.

The DA in its current form fails to provide evidence that it is offering anything superior to the “do nothing” option.

The subject site is on an unnamed tributary of the Wollangambe River which flows into the World Heritage listed Blue Mountains National Park. The tributary joins the Wollangambe more than a kilometre downstream from the subject site.

The hydrology on the subject site is not natural but evidence has not been provided that it is significantly impacting surrounding natural areas. The overall environmental qualities of the Wollangambe catchment have been affected much less significantly in recent years by this dormant quarry than, for example, by the still operational Clarence Colliery which is located on the Wollangambe River, upstream from the subject tributary.

WILL IT CAUSE HARM TO HUMAN HEALTH OR THE ENVIRONMENT?

There are major risks that the operations envisaged will cause harm of many different kinds.

It is doubtful the impacts of the periodic release of water from the currently water-filled voids can be adequately modelled. Recent climatic effects have left many flora and fauna species in a fragile situation. It would be better to leave water discharges to follow their existing patterns than to interfere with them. The risks of worsening erosion and sedimentation, both near the site and downstream, cannot be discounted.

World Heritage Areas that have been so listed on account of their natural values do best if they are surrounded by communities that see worth in the preservation of quiet and non-disturbance to the natural ambience. For several years, since the cessation of quarrying at the subject site, our Society has noticed that residents in Clarence, Dargan, Newnes Junction and the northern part of Bell have participated more in activities that show appreciation of this area’s natural qualities.

The overall impacts on the health and wellbeing of these communities of industrial noise, truck movements and atmospheric pollution needs to be taken extremely seriously.

CONCLUSION

To achieve the best environmental outcomes for this site, the weight of arguments falls substantially in favour of refusing the DA and leaving the subject site to regenerate at its current pace for the time being.

This submission has not dealt with the possibility that an entirely different regeneration intervention strategy could produce a better environmental outcome.

The appendices to the DA contain lengthy discussion of the most sensitive fauna and flora species which are or could possibly be on or around the subject site. The risk to each one of these species is usually regarded as minimal but, when you add all the risks together, that provides further grounds for doubting that this DA is beneficial or fit-for-purpose compared to the do nothing option.

The present task before Council is to refuse this DA.

Yours sincerely,

Don Morison
Vice President
Blue Mountains Conservation Society
donmorison@bluemountains.org.au
02 8230 2116