



## 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](mailto:bmcs@bluemountains.org.au) Web Site: [www.bluemountains.org.au](http://www.bluemountains.org.au)

### Nature Conservation Saves for Tomorrow

General Manager  
Lithgow City Council  
PO Box 19  
180 Mort Street, Lithgow NSW 2790

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To whom it may concern,

The Blue Mountains Conservation Society (The Society) is a community-based volunteer organisation with 900 members. Our mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains. In fulfilling this mission, the Society advocates protection of the Greater Blue Mountains World Heritage Area (GBMWA).

**We are writing in regards to the amended application for [Development Proposal-DA 294/18](#), Lithgow Council ATS Bell Quarry Rehabilitation Project P/L - Lot 23 in DP 751631 - Sandham Road, Newnes Junction - LEC Proceedings 21/91361 - (PVL:210207).**

The Blue Mountains Conservation Society notices little difference from the proposal rejected by the Planning Panel in 2019 when examining the revised application which is the subject of the applicant's appeal.

The principal changes that have occurred since the 2019 determination involve increased pressures to deposit waste from the Sydney Basin in surrounding regions generally and the increased vulnerability of populations both of humans and other species owing to changes in the physical environment caused by various events.

In a sustainable future, it should no longer be seen as acceptable to generate waste products in an urbanised basin of ever-increasing human population and then consume more resources and create emissions and other environmentally damaging by-products that are simply transferred to another region or regions.

Our organisation agrees with the position that the proposal "is properly characterised as a waste disposal facility" and that "the site has been sufficiently remediated to a stable state already apart from the ongoing need for weed management". These words are contained in a report by Lithgow Council officers to the Councillors which we understand that the full Council adopted on 24/1/22.

The Blue Mountains Conservation Society supports the statement made by Mr Chris Gambian, Chief Executive of the Nature Conservation Council of NSW, that Sydney should not export its environmental problems to the regions. Mr Gambian was commenting on the identification of a precinct at west Lithgow and three other precincts outside Greater Sydney as suitable for a new toxic waste incinerator to dispose of toxic wastes created in Greater Sydney in circumstances where all possible incineration sites within Greater Sydney are considered too hazardous.

Crucial to the Bell Quarry development application is the assertion that more disturbance is acceptable to re-establish physical contours of the landform that have not existed for many years. Data collected throughout research for the original application and for the revised application shows that many native flora and fauna species are surviving in the affected part of the Wollangambe River catchment, despite the residue of the sandmining operations, the 2019-2020 bushfires and the release of coal fines into the Wollangambe catchment from an accident at the nearby Clarence Colliery in 2015. It is difficult to see how further disturbance to these flora and fauna habitats can be justified, given the stresses they have recently endured.

## **THE CONDITION OF THE WOLLANGAMBE CATCHMENT AND SPECIFIC EFFECTS OF THE BELL QUARRY PROPOSAL**

All catchments within the Greater Blue Mountains World Heritage Area continue to be affected by human activity around the edges of the World Heritage Area as well as the aftermath of the 2019-2020 bushfires and the impacts of subsequent extreme weather events on ecosystems made more vulnerable by those bushfires.

It is most important to give native flora and fauna species within this catchment the maximum opportunities to continue their recovery. The restoration of the contours existing many years ago before the sand mining is likely to make a minimal contribution towards that recovery. Indeed, it is probable that the truck movements, human presence and other by-products of implementing the DA would be a nett negative for recovery of the ecosystems.

The material proposed to be dumped into the disused quarries contains both VENM (virgin excavated natural material) and ENM (excavated natural material). It is unclear what kind of material would meet the criteria to be placed in this part of the Wollangambe catchment as ENM and what the effects of it leaching into the catchment could be.

Since the initial DA was rejected, changes have been made to the proposal to create barriers to groundwater flow and to the infiltration of rainfall surface water into the emplaced material and groundwater diversion system. The lack of information on what the overall effects of these barriers could be on the hydrology of the catchment is of concern as is the level of risk to the catchment from leaching of the poorly specified waste materials if the precautions fail.

## **ATMOSPHERIC IMPACTS OF TRUCKING WASTE**

The DA proposes a large number of truck movements to the quarry site during the restoration of historic contours. Various sections of the Great Western Highway, Darling Causeway, Bells Line of Road and Sandham Road would all be affected by significant increases in truck traffic. During the life of this project, it seems inevitable that the dominant motive power for the vehicles would be fossil fuels. The particles emitted in using such fuels cause environmental hazards in the atmosphere overall, in the immediate air quality adjacent to the traffic routes and in the vegetation and soils adjacent to the traffic routes.

We do not believe that traffic works proposed for Sandham Road would significantly ameliorate the environmental impacts of the truck movements. Respecting other major traffic works along the relevant truck routes during the life of the project, the only section that could be affected by a major traffic deviation is the section between Evans Lookout Road, Blackheath, and Mount Boyce Heavy Vehicle Checking Station which could have a road tunnel provided, although the Blue Mountains Conservation Society opposes that project on grounds not exclusively related to the Bell Quarry DA. Less than five kilometres of the Great Western Highway would be affected by that project.

The remainder of the traffic network used by the trucks would be subject to increased traffic congestion. Trucks and other vehicles would cause increased emissions through braking and

accelerating on numerous relatively steep sections of the Great Western Highway as well as queuing at existing and new traffic signals which would, in many cases, have to have their phasing modified to cope with the increase in overall traffic and changes to the composition of the traffic. Of course, there would be pressures to adopt band-aid type traffic improvements at various newly created traffic bottlenecks.

## **SPILLAGE AND CRASHES DURING TRUCK MOVEMENTS**

It would be very difficult to create adequate safeguards against environmental damage from load spillage and/or vehicle crashes along the Great Western Highway, Darling Causeway and Bells Line of Road. Major sections of these roads are adjacent to World Heritage National Parks or very close to them.

The catchment areas within these World Heritage National Parks have already suffered extensive stress and contamination accumulating during decades of road construction, road maintenance and traffic movement. These stresses result from direct impacts on the hydrological systems including streams and swamps as well as disturbance to the vegetation communities whose health underpins the ongoing functioning of the hydrological systems and ecosystems.

These concerns are exacerbated by the lack of specifics regarding the exact types of fill that will be transported by truck to dump in the disused quarries.

## **STATIC WATER BODY**

The local communities near to the Bell quarries recognise the usefulness of the site in its existing state in providing a static water body that can be used for aerial firefighting purposes. Our Society appreciates the point they are making. Non-interference with the static water body could quite likely facilitate halting future wildfires before their full potential for environmental damage is realised.

## **CONCLUSION**

The development application has not been sufficiently modified to overcome the objections which led to the project's rejection in 2019. The impacts of the fires in 2019/2020 add to the reasons for being cautious about further disturbance in the Wollangambe River catchment as well as in other catchments in the Greater Blue Mountains World Heritage Area which would be affected by the truck movements.

The Blue Mountains Conservation Society continues to oppose this project.

Yours sincerely



Tara Cameron  
President  
Blue Mountains Conservation Society  
mobile 0419 824 974 or email [president@bluemountains.org.au](mailto:president@bluemountains.org.au)