



JUSTIN MELEO

SUPPORT

Submission ID: 216739

Organisation:	<i>Australian Resource Development Group Pty Limited</i>	Key issues: <i>Other issues</i>
Location:	<i>New South Wales</i>	
Attachment:	<i>Attached overleaf</i>	

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Refer attached written submission

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Delivered via email: ipcn@ipcn.nsw.gov.au

21 November 2024

Dear Stephen,

Stone Ridge Quarry (SSD – 10432) Submission to Independent Planning Commission

We refer to the IPC's consideration of the above project and provide the following submission (refer Attachment 1).

This submission is provided to the IPC by Australian Resource Development Group Pty Limited (ARDG) to addresses specific issues raised by the community at the Public Meeting held on 14 November 2024.

This submission does not present any additional information not already contained in assessment documentation already before the IPC either as part of the EIS, Submissions Report, Amendment Report, Response to DHPI Requests, and/or the IPC Stakeholder Meeting, Site Inspection and Public Meeting process.

Yours sincerely,



Dr Justin Meleo
Director – Planning and Development

Attachment 1

Stone Ridge Quarry (SSD – 10432)

Submission to Independent Planning Commission

1. Traffic

The following aspects of the Project's traffic were raised as concerns during the Public Meeting:

- Early morning truck traffic noise (commencing at 4.30 am) passing residents' dwellings on Italia Road, noting that this relates to dwellings northwest of the quarry access point beyond the crest on Italia Road
- Safety issues at Pacific Highway / Italia Road intersection, on Italia Road and on the Pacific Highway due to increased truck traffic
- Design options for Pacific Highway / Italia Road intersection
- Enforcement of proposed haulage route to / from site (*i.e.* 'left out, left out' at site access on Italia Road and at Pacific Highway for haul trucks; 'right in' only at site access for haul trucks; turnaround on Pacific Highway at Tarean Road interchange)

Community concerns regarding potential traffic impacts of the Project are acknowledged. ARDG is committed to ensuring that impacts of quarry haul traffic on the community are minimised by implementing a range of management and mitigation measures and controls that will be documented in a Traffic Management Plan (TMP) prepared for the Project, which will form part of the broader Environmental Management Strategy (EMS) prepared and implemented for the Project. The following information is submitted to address issues raised at the public meeting.

Early Morning Truck Noise

The Project's hours of operation for loading and despatch, detailed in Table 1 of the draft Development Consent, are:

- 6 am to 10 pm Monday to Friday
- 7 am to 3 pm Saturday
- At no time on Sundays or public holidays

As emphasised to the IPC at the Stakeholder, Site and Public meetings, ARDG is committed to only utilising that portion of the dedicated B-double haul route on Italia Road between the site entrance and the Pacific Highway for haulage to / from the site. We note that on this haul route there is only a single dwelling (R1) located at the corner of Italia Road and the Pacific Highway. Importantly, as detailed in Table 6-7 of the Department of Planning, Housing and Infrastructure (DPHI) assessment report, the Project will not increase existing noise levels at this receiver.

It is acknowledged that residents west of the quarry access point experience very early morning truck traffic noise passing their dwellings. Importantly, this existing traffic noise would not be exacerbated by the Project, given that the Project does not propose to use this section of Italia Road.

In order to minimise early morning truck noise, ARDG is committed to ensuring that trucks do not arrive at site well before opening hours. Early morning truck queuing at the site entrance will be prevented by implementing and enforcing a Driver's Code of Conduct that amongst other matters would clearly outline the prohibition on queuing at the site access, or on Italia Road. In addition, the site entrance will be constructed to limit available space for queuing prior to opening hours. Further, prominent signage at the site entrance will clearly indicate the prohibition on queuing on the access road.

Road Safety

As noted at the Public Meeting, the Project has been the key driver for proposed road safety improvements at the Pacific Highway / Italia Road intersection. ARDG consulted extensively with TfNSW over a period of five (5) years on a range of design options for treatment of the intersection, which included a design for a southbound overpass. ARDG has also engaged with the two other quarry operators / proponents on Italia Road regarding upgrade of the intersection. As discussed at the Public Meeting, the design accepted by TfNSW would facilitate a dedicated left turn lane on to the Pacific Highway from Italia Road with an associated acceleration / merge lane. It is currently the subject of a DA to Port Stephens Council which is under assessment.

Concerns were raised at the Public Meeting regarding increased truck usage both along Italia Road and the Pacific Highway. We note that the issue of the capacity of these roads, as well as the Tarean Road interchange to the north (for both existing, Project and cumulative use scenarios) were modelled and assessed in the TIA, which confirmed satisfactory performance levels and safety on all roads.

The site access opposite the entrance to Boral Seaham Quarry was developed in consultation with Port Stephens Council. The site access point is the safest option, as it achieves critical sight distance requirements that cannot be achieved at alternate locations. In addition, it consolidates the existing Seaham Quarry access to maintain a single conflict point on Italia Road.

Safe driving for all vehicles (in particular haulage vehicles) to / from the site is of paramount importance to the Project. It is acknowledged that the short section of Italia Road that would be utilised by the Project would experience an increase in heavy vehicle traffic. The TIA prepared for the Project assessed this impact (including cumulative impacts) and as detailed in the DPHI assessment report, the assessment concluded that the additional traffic associated with the project would not present unacceptable safety risk to existing road users. Since the TIA was prepared, Port Stephens Council has reduced the posted speed limit on Italia Road from 90 km/hr to 80 km/hr which will further improve road safety.

Enforcement of Haulage Route

It is critically important that all haulage trucks accessing the Project adhere strictly to the proposed Project haulage route. As indicated by ARDG at the Public Meeting, a zero-tolerance policy to non-compliance will be strictly enforced. Breach of the policy would result in serious employment and site access implication for drivers including an immediate ban from further accessing the site.

Enforcement of the rules governing strict adherence to the haulage route will be managed via a range of measures that would be detailed in the Traffic Management Plan (TMP) prepared for the Project and implemented on site. These controls include:

- Driver's Code of Conduct included in the site induction process, which would include –
 - Responsibilities of each haulage driver for accessing and exiting the site using the approved haulage route (*i.e.* right in; left out at Italia Road/ left out at Pacific Highway; turnaround at Taren Road; U-turns on the Pacific Highway prohibited)
 - The zero-tolerance policy for non-compliance with the approved haulage route

- Driver and vehicle registration process for all haul trucks to enable tracking of drivers against vehicles
- Clear entry / exit signage that reinforces the approved haulage route and consequences for non-compliance

Compliance with the haulage route will be managed through:

- Regular random audits of vehicle movements through the Pacific Highway / Italia Road intersection
- Remote camera monitoring of site entrance / exit
- GPS tracking on company vehicles
- Hotline for reporting non-compliance
- Community complaints reporting procedures
- Regular Community Consultation Committee (CCC) meetings at which traffic management issues will be discussed

2. Air Quality

The following aspects of the Project's management of dust were raised as concerns during the Public Meeting:

- Dust management at the site and potential for hazard associated with crystalline silica
- Potential contamination of residents' drinking water tanks

Community concerns regarding potential air quality impacts of the Project are acknowledged. The following information is submitted with respect to the issues raised at the Public Meeting.

Dust management / crystalline silica

Hard rock quarry operations by their nature have the potential to generate dust which if not managed appropriately can be problematic from a WH&S perspective for site personnel, as well as nearby sensitive receptors. The assessment of air quality impacts (including cumulative impact) presented in the EIS indicated Project compliance with all relevant criteria (as detailed in the DPHI assessment report).

Dust management is a critical WH&S responsibility and consideration of any quarry operation. Importantly, control and management of dust generation at the source is critical for ensuring a safe working environment for all quarry site personnel. Effective dust management at the source also ensures that potential impacts at sensitive receptors are well below the relevant EPA criteria limits.

A summary of the potential risk of silica dust to sensitive receptors is detailed in Items 195-197 of the DPHI assessment report. This indicated that the potential health risk to sensitive receptors is low and manageable, given that PM 2.5 levels at the Project site boundary were approximately 4x lower than the criteria limit.

ARDG is committed to ensuring that impacts of dust on quarry site personnel and the community are minimised through the implementation of a range of management and mitigation measures that will be documented in a Dust Management Plan that will identify the potential dust causes, compliance requirements, testing measures and control methods for the site. Control and suppression of dust generated through quarry operations would be achieved through the implementation of a range of measures including:

- water sprays on processing plant
- watering of stockpiles
- use of eco-binders on unsealed trafficked surfaces
- sealing of entrance road
- Driver’s Code of Conduct included in the site induction process, which would document the mandatory dust management procedures for all haul trucks leaving the site, including –
 - inspection and clean down of drawbars / tail gates / flat surfaces
 - use wheel and truck wash
 - tarping of loads
 - speed limits on unsealed surfaces in quarry
- monitoring to ensure compliance with WH&S requirements as well as Environmental Protection Licence conditions, including
 - the use of real time meteorological and air quality monitoring data (including regional monitoring data collected and reported by the EPA and Bureau of Meteorology)
 - Regular review of operations as required to determine efficacy of all operational controls
- community complaints reporting procedures
- regular CCC meetings at which dust management issues will be discussed

Residents’ water tanks

As indicated at the Public Meeting (and detailed in Item 187 of the DPHI assessment report), ARDG has committed to undertaking routine inspections (and cleaning if necessary) of nearby resident’s water tanks and solar cells. This would include undertaking inspections to determine baseline conditions.

3. Biodiversity

The following aspects of the Project’s biodiversity assessment and impacts were raised as concerns during the Public Meeting:

- Reliance of the Project on Port Stephens Comprehensive Koala Plan of Management (CKPoM)
- Bats in Balickera Tunnel – monitoring
- Impact to habitat corridors and movement of fauna

Community concerns regarding potential biodiversity impacts of the Project are acknowledged. The following information is submitted with respect to the issues raised at the public meeting.

Port Stephens Comprehensive Koala Plan of Management (CKPoM) 2002

Several comments were made suggesting that the CKPoM (PSC, 2002) is an “outdated document” and should therefore not be relied on for assessment of Project impacts. It is worth noting that:

- The Project was assessed against the requirements of the Biodiversity Assessment Methodology (BAM), not the CKPoM (PSC, 2002), in accordance with the SSD assessment process.

- The CKPoM (PSC, 2002) was utilised by ARDG to help guide site selection and its decision to proceed with the Project.
- The CKPoM (PSC, 2002) is a current planning document mandated by Port Stephens Council, against which assessment of potential impacts of development on koala in the LGA is made. While the CKPoM is not technically required to be part of the SSD assessment process, ARDG was requested by DPHI to prepare an assessment of the Project against the '*performance criteria for development applications*' listed in Appendix 4 of the CKPoM (PSC, 2002). Assessment of the Project against the performance criteria indicated compliance of the Project with all criteria.

Bats in Balickera Tunnel

The Blast Impact Assessment prepared for the EIS, and additional information provided during the RTS phase of the Project, determined that vibration and overpressure from blasting associated with the Project were unlikely to affect bats roosting in the Balickera Tunnel. Notwithstanding, ARDG has committed to the preparation and implementation of an adaptive management plan which includes vibration monitoring, monitoring of bat movement at the Balickera Tunnel portals during and immediately following Project Blasts, and a commitment to modify blast activities in the unlikely event that blasts do disturb bats in the Tunnel. The requirement for both the plan and monitoring are conditioned in the draft Development Consent.

Impacts to Corridors

While a detailed assessment of the potential impacts to habitat corridors and fauna movement is included in Section 3.2.3 of the BDAR prepared for the Project, this issue was raised as a concern during the Public Meeting and accordingly is addressed here.

In a regional context, the Project disturbance footprint sits within a larger habitat patch which is notionally bounded by Karuah River in the east, the Pacific Highway in the south and the Williams River in the west (refer **Figure 1**). Direct connectivity to the east of the Pacific Highway in the vicinity of the Project disturbance footprint is limited to Nine Mile Creek which flows beneath the Pacific Highway and eventually into Grahamstown Dam. Connectivity across the Pacific Highway for mobile fauna species is possible, however, it presents a significant vehicle strike risk for terrestrial species. The Project location does not present a barrier to fauna movement from the east of Pacific Highway and the broader habitat patch located to the West of the Pacific Highway.

The Project disturbance footprint is surrounded by large areas of intact native vegetation within the Wallaroo State Forest, with direct connection to Wallaroo National Park, Karuah National Park and Karuah State Conservation Area. The Project disturbance footprint is located within the southern limit of the Wallaroo State Forest and represents < 2 % of the total area of the Wallaroo State Forest and a significantly smaller area of the existing regional habitat corridors (refer **Figure 1**). The Pacific Highway separates the Wallaroo State Forest and the Project disturbance footprint from other local conservation areas to the east of the Pacific Highway, such as parts of the Karuah National Park, the Medowie State Conservation Area, the Medowie Nature Reserve, Moffats Swamp Nature Reserve and Tilligerry State Conservation Area.

At a local scale, the existing land bridge pinch point associated with the Balickera Canal is approximately 1,200 m wide (distance between the two portals) (refer **Figure 2**) and this presents a physical barrier to terrestrial fauna

movement but not to avian fauna. It is recognised that the proposed disturbance area would result in the creation of two new pinch points (approximately 390 m and 675 m wide) between the Project disturbance footprint and the northern and southern portals of the Balickera Tunnel and associated land bridge for terrestrial fauna movement.

There are also three additional existing pinch points located to the south/west of Italia Road, around the northern, eastern and southern sides of the existing and proposed disturbance footprint Seaham Quarry (refer **Figure 2**). These existing pinch points have widths of approximately 165 m, 275 m and 215 m on the northern, eastern and southern sides respectively of the Seaham Quarry footprint (for a total corridor width approximately 655m). These existing pinch points already pose a constraint to fauna movement on land south/west of Italia Road. The location of the Project development footprint in the mapped regional corridor (refer **Figure 1**) would not isolate any areas of habitat and the pinch points created by the project are wider than any of the existing local connectivity pinch points south/west of Italia Road and the larger of the corridors to be retained north of Italia Road to the southeast of the Project disturbance area is similar in size to the cumulative width of habitat corridors to the south of Italia Road.

Balancing the needs of resource optimisation and biodiversity constraints has been a key design consideration for the Project, reflected in the amendment of the Project boundary (as part of the response to submissions process) via relocating the western extent of the footprint as far away from Italia Road as possible. This has resulted in the retention of a wildlife corridor between Italia Road and the quarry disturbance footprint that will retain access to land to the south. The proposed disturbance footprint was also further reduced as part of the response to submissions process (via a reduction in extent of the northern and eastern boundary), which also reduced potential impacts on the mapped regional corridor.

Restrictions on fauna movement within the corridor in the vicinity of the quarry disturbance footprint would also be minimised by limiting fencing to operational areas of the quarry in accordance with regulatory / safety requirements. Non-operational areas within the disturbance footprint as unfenced until such time as they become part of the operational area. Fencing would be post and wire strand to help facilitate fauna movement.

In addition to a reduced speed limit along the proposed quarry access road, ARDG would implement fauna crossing signage, a driver education program and reduced speed limit for heavy vehicles travelling into or leaving the quarry on Italia Road as part of the Driver's Code of Conduct to reduce the potential for road related fauna impacts. The speed limit along Italia Road has also recently been reduced from 90 km/hr to 80 km/hr for all motorists which, will further assist in reducing the potential for vehicle strike of fauna.

4. Public Access and Use of the Forest

Concern was raised at Public Meeting that the Project would adversely affect existing public enjoyment and use of the Forest given the exclusion of the public from the site.

The proposed Project disturbance footprint is 68.02 ha, which represents < 2 % of the area of Wallaroo State Forest (3,596 ha). Therefore, based on area alone, impacts to public use of the forest would be minimal. Importantly, Nine Mile Road, which is one of the main access roads into the forest near the Project will not be affected by the proposal and would remain open. As detailed in **Section 3**, any operational areas of the quarry

would be fenced, while the areas within the disturbance footprint would remain unfenced until such time as they become part of the operational area. Prominent signage would be installed along the fence warning of quarry operations and restrictions on entry to the site.

5. Cumulative Impacts and Management Plans

Several concerns were raised that cumulative impacts of the Project were not considered. While we note that at the Public Meeting the IPC specifically requested DPHI to respond to this issue, it is worth reiterating that assessment of cumulative impact assessments of the Project were undertaken for all relevant matters and documented in the EIS.

Comment was also made that management plans have not been prepared for the Project. ARDG has a clear commitment to the preparation of an Environmental Management Strategy (EMS) for the Project. Preparation of an EMS is a post-approval requirement of the Project and as such is conditioned in the draft Development Consent, as are requirements for preparation of a range of specialist plans for each area of management.

6. General Comments

Several additional issues were raised, the substance of which are précised below, with a response provided for each issue.

- *Balickera House (R19) not included in blast assessment or cumulative impacts assessments*

The Blast Impact Assessment (BIA) addressed all identified sensitive receptors (including private residences), buildings/structures (including heritage sites), infrastructure, animals and significant natural features within 2 km of the Project site. The BIA specifically identified Balickera House (R19) as a ‘heritage site’ for the assessment, with specific vibration and airblast criteria. The assessment indicated Project compliance with both vibration and airblast criteria under ‘worst-case’ operating scenarios. Balickera House (R19) was also included as sensitive receptor for both Noise Impact and Air Quality Impact Assessments, which also assessed cumulative impacts of these aspects of the Project.

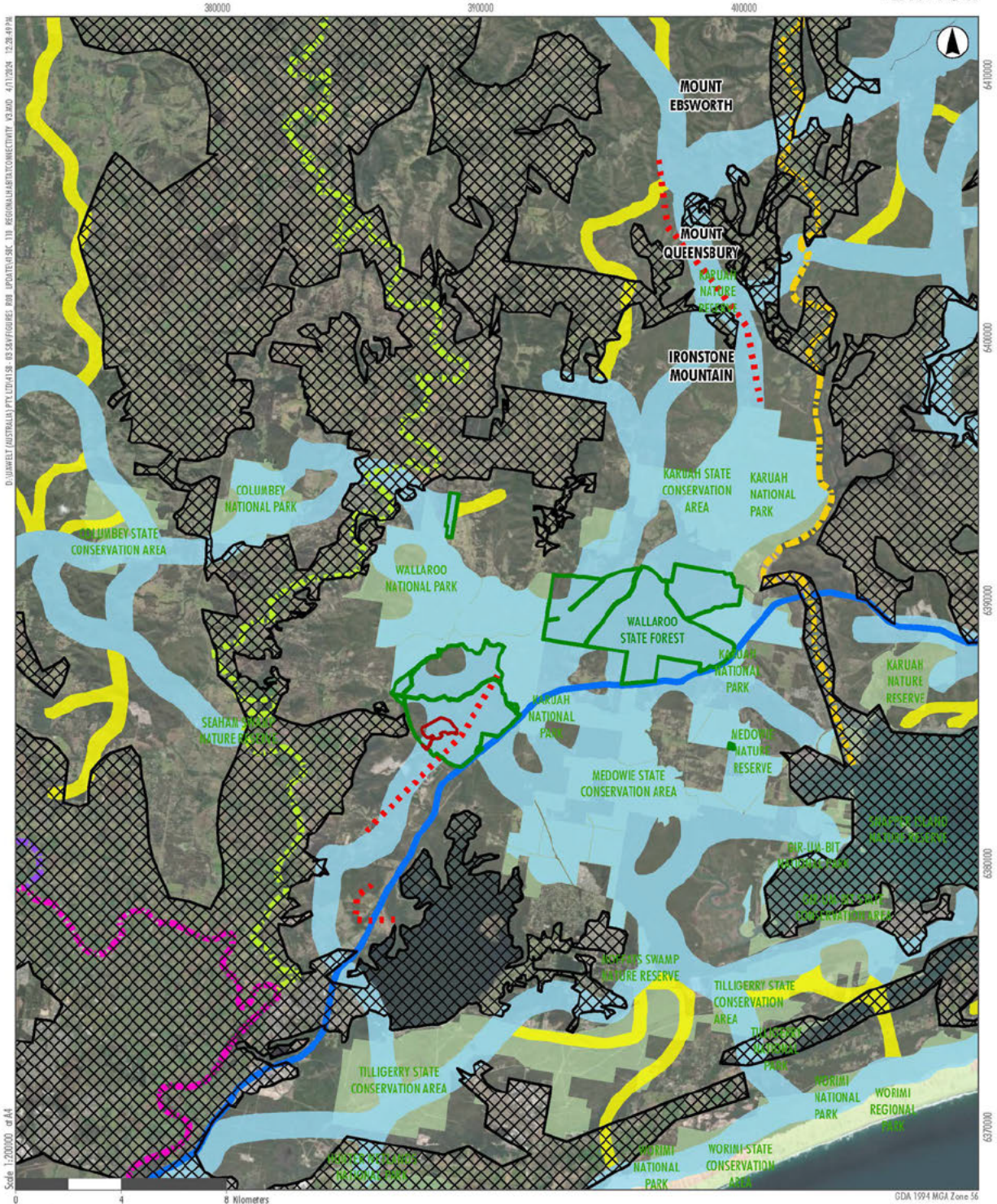
- *Farms (R19) and animals not assessed*

Potential impacts on grazing animals located at R19 was specifically addressed in the BIA.

7. References

Port Stephens Council (2002). *Port Stephens Comprehensive Koala Plan of Management*.

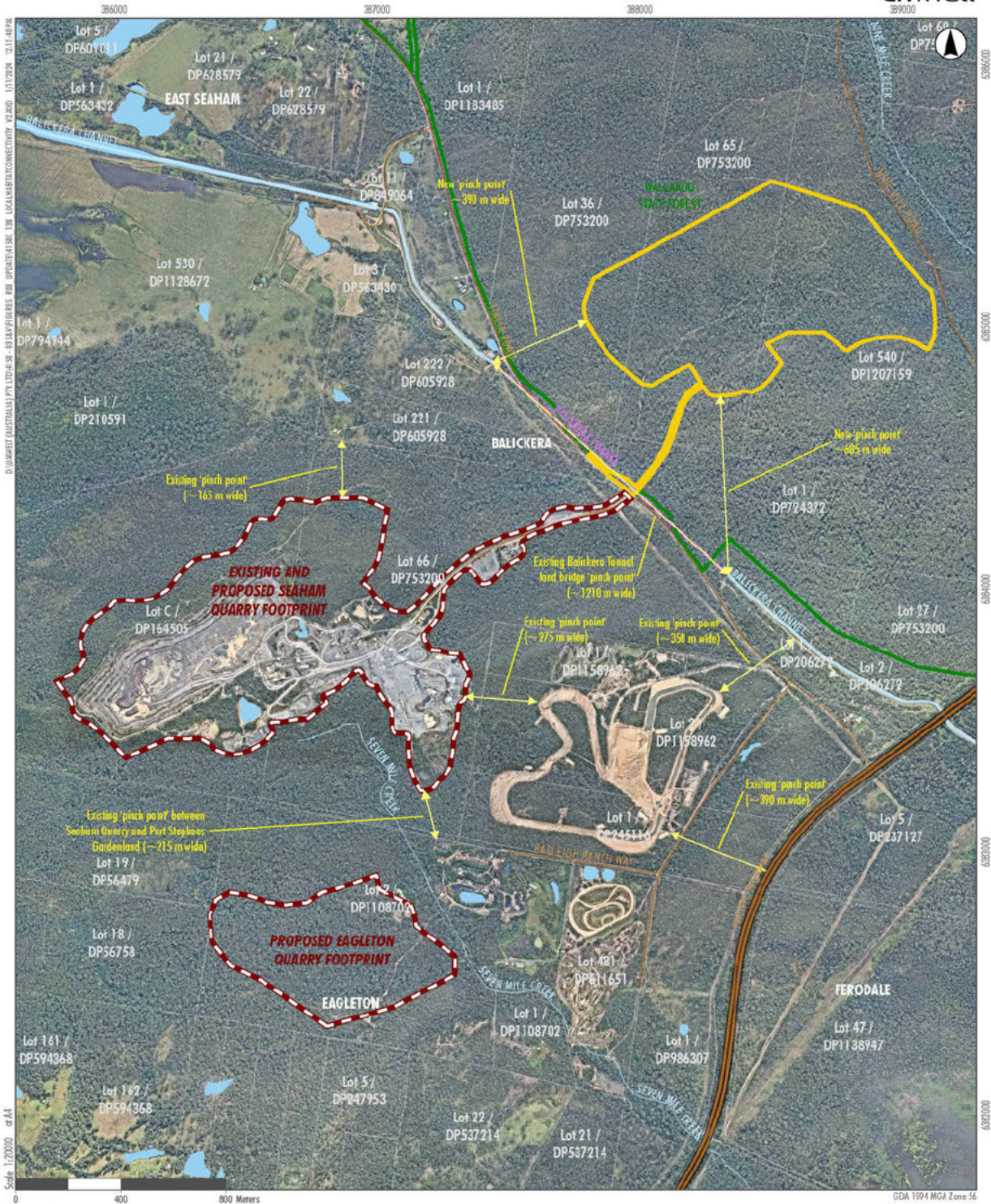
Figures



- Scale 1:200000 at A4
0 4 8 Kilometers
- Legend**
- Disturbance Area (Development footprint)
 - Local Habitat Linkage
 - Broad Area Habitat Linkage Barrier
 - National Parks (NPWS Estate)
 - Wallaroo State Forest
 - Fauna Corridors**
 - Regional
 - Subregional
 - Hunter River (likely barrier to connectivity)
 - Karuah River (likely barrier to connectivity)
 - Paterson River (likely barrier to connectivity)
 - Williams River (likely barrier to connectivity)
 - Pacific Highway (Barrier / risk of vehicle strike)

Image Sources: ESRI Basemap (2021) | Data sources: NSW FSD (2022), DPE (2010), Umwelt (2022)

Figure 1 – Regional Habitat Connectivity



- Legend
- Disturbance Area (Development footprint)
 - Proposed Quarry Footprints
 - Wallaroo State Forest
 - Pacific Highway
 - Road
 - Balickera Tunnel
 - Drainage Line
 - Waterbody
 - Lot Boundaries

Image source: Neorap (August 2022) Data source: NSW FSDP (2022)

Figure 2 – Local Habitat Connectivity