INTRODUCTION

Provided below is a response to the submissions made with regards to the Goonumbla Quarry Expansion.

ROADS AND MARITIME SERVICE

The proponent accepts both RMS recommendations.

RURAL FIRE SERVICE

The proponent accepts both RFS recommendations.

OFFICE OF ENVIRONMENT AND HERITAGE

As noted in the EIS, and consistent with OEH comments, impacts to White box yellow box Blakely's red gum woodland would be offset by compensatory planting of 3.6 ha of locally native plants in the retained vegetation along the hill and ridge beyond the quarry footprint. The plantings would aim to enhance the floristic and structural characteristics of the woodland and increase resilience of those areas.

OEH recommendations 1 to 3 inclusive are accepted by the proponent. It is not possible however to secure the offset in perpetuity through a legal instrument as the land is not owned by Ausrock Quarries Pty Ltd. The proponent would, however, provide for the long term protection and management of the offset area through expanding that portion of the development site leased from the landowner and managing this area in accordance with the *Biodiversity Offset Management Plan*.

ENVIRONMENT PROTECTION AUTHORITY

With the possible exception of the below, the proponent accepts the EPA GTAs.

With respect to the hours of operation, the noise assessment was scoped to provide information to permit extraction and processing to start at 7.00 am Monday to Friday, and from 7.00 am to 3.00 pm on Saturday. The assessment showed compliance, however the GTAs restrict these activities to the existing EPL hours.

We seek clarification from the EPA on this matter.

BORAL

Geolyse considers that the EIS does adequately address the SEARS and that the assessment of impacts are appropriate and accurate.

Specific comments on water, air quality, noise, biodiversity, traffic and waste are not addressed via this response on the basis that the appropriate regulatory authorities (being the Roads and Maritime Service, the Environment Protection Authority and the Office of Environment and Heritage) have all determined that the assessment methodologies undertaken and the information provided in the EIS has been adequate to permit informed decision making and to enable the issue of their General Terms of Approval (or concurrence as applicable).

The following responses in relation to the specific Boral submission is provided below. Nomenclature adopted by Boral is adopted for ease of cross referencing.

2.1.1 Inconsistencies

- The DA lodged is supported with an EIS that identifies and assesses impacts with the proposed expansion. The extent of works proposed via the EIS is clearly articulated and does not include regularisation of any works that are suggested to have been completed without consent. The EIS does not seek to act retrospectively or to regularise activities which may have historically occurred. It is the role of the consent authority to determine the application as lodged and advertising of the application by Council provides interested parties the opportunity to comment on the information as lodged. It is not an opportunity to comment on matters outside of the scope of the application, as Boral have done.
- There is no inconsistency with regards to ARTC consultation. The Executive Summary details the consultation between the proponent and ARTC, while Section 4.3 details the consultation effort between Geolyse and ARTC.
- The various site drawings and Lot/DP descriptor clearly confirm the access track is to be located in Lot 32.

2.2.1 Adequacy of Assessment

- Sections 5.4 and 5.7.3 make it clear that an EPL is required.
- No change to the existing approved road is proposed and therefore, notwithstanding, the provisions of the Water Management Regulation with respect to controlled activities, no specific approval under the WM Regs are required in relation to the development proposed via this EIS.
- The existing development is greater than 40 metres from mapped waterfront land. The proposed expansion results in the area of impact associated with the proposed development being offset by a greater distance.
- The submission notes perceived inadequacies in the assessment with regard to the Mining SEPP, specifically, clauses 12AB(3), 12AB(7) and 12(a)(i). The following is noted in this regard:
    - *12AB(3) – Cumulative Noise Level* – the assessment has been the subject of review by the EPA including issuance of their General Terms of Approval – the assessment is therefore considered acceptable and sufficient in this context;
    - *12AB(7) – Aquifer Interference* – The submission considers that the desktop groundwater assessment undertaken by Geolyse is insufficient through the lack of site-specific data with regards to water quality and hydraulic conductivity. Geolyse maintains that site specific data is available on the grounds that the existing open-cut pit extends to a depth of approximately 33 m below surface and has not intersected groundwater (Section 13.2.2 of the EIS). Geolyse considers hydraulic data sourced from site observations of the existing open-cut pit to be significantly more comprehensive than inference of the hydraulic profile from point data collected from a monitoring bore network. In the [unlikely] event of groundwater being intersected by the proposed quarry expansion, noting that the vertical extent of Stage 2 is limited to 10 m below the existing quarry base, the mitigation measures documented in Section 13.3 of the EIS (dot point 2) are sufficient to avert potential associated environmental impacts to groundwater resources.
    - *12(a)(i) – Existing and approved uses of land in the vicinity of the* development – surrounding land uses in the area near or surrounding the development site are characterised by broad acre farm operations with scattered residential dwellings. To the west is the Parkes-Narromine Railway line, which is the subject of the currently pending Inland Rail Major Project (being State Significant Infrastructure). The EIS provides consideration of the degree of primary production land within the Parkes Shire and estimates less than 0.000003% of land is affected. The surrounding land uses are described in Section 12.1 of the EIS. Cumulative impacts from aspects of the development are considered both generally within Section 21 of the EIS, as well as specifically in relation to noise, air quality and traffic. In the context of these specific assessments, the assessment found that cumulative impacts are unlikely. In respect of all three specific assessment areas, the relevant regulatory bodies have completed their assessment and issued their GTAs/concurrence. The EIS concludes there is minimal likelihood of unreasonable or significant cumulative impacts. The EIS notes that any future cumulative impacts associated

with potential future mining operations in the vicinity of the site would be the subject of separate assessment in the context of those future applications. The EIS provides sufficient consideration of the project in the context of the existing and approved uses in the vicinity of the site to enable the consent authority to make a favourable determination in the context of Mining SEPP Clause 12(a)(i).

- Terrestrial biodiversity is addressed in Section 5.8.3.1 of the EIS. The LEP requires consideration of potential impacts to terrestrial biodiversity and identification of appropriate mitigation measures; this is adequately addressed by the Flora and Fauna Assessment completed by Biosis, provided in Appendix C of the EIS and accepted by OEH via their grant of General Terms of Approval.

2.10 Waste

- Timing of classification/removal of material from the waste dump is clearly addressed in Section 15.8.5 of the EIS: waste material would be disposed of lawfully before quarry expansions works commence.
- Appropriate waste classification guidelines would be used.
- Acid base accounting tests are not considered to be necessary. Petrographic analysis did not identify any sulphides in the rock composition. Acid rock drainage is caused by formation of acid when sulphide-bearing rocks are exposed to oxidising conditions (https://www.alsglobal.com/-/media/als/resources/services-and-products/geochemistry/technical-notes/acid-rock-drainagetechnical-note.pdf?la=en).
- The volume of overburden stripping volume is provided clearly in Drawing 215453_02C_C004 (Stage 1 Quarry Layout). The volume of waste in the waste dump is not known but it is evident from Figure 31 in the EIS that is occupies a small surface area (approximately 15 x 10 m). Section 18.1.2 states that “no significant volumes of general waste would be produced”.

2.11 Public Safety

- Context for the petrographic analysis is provided in the petrographic report in Appendix G of the EIS; it was undertaken to determine suitability of the basalt for use as ballast and marine armour rock. The petrographic analysis is dated 10 July 2013 and development consent no. DA 12097 was granted on 16 July 2013, and therefore the analysis was undertaken before consent was granted.
- The petrographic analysis identifies the ‘approximate average composition’ of the ballast material. The primary and secondary mineral components identified do not include any minerals that form naturally occurring asbestos.

2.12 Visual

- It is relevant to note that notification to neighbours did not result in any submission, and consultation with neighbours did not raise visual impacts as a concern.
- RMS have not identified any concerns with the potential visual impacts from public viewpoints.

2.13 Social and Economic

- Clause 7 of Schedule 2 of the EP&A Regulations specifies that an EIS must include justification for the carrying out of the proposed development and this may include a cost benefit analysis. However, this is not the only way to provide this justification. It is the position of the applicant that the justification for the carrying out of the development is clearly articulated and a Cost Benefit Analysis is not required to understand that a source of construction material, located close to its end use location, would have a benefit for the community (through reduced costs and reduced disruption to the community from a reduction in traffic movements and emissions).

2.14 Consultation

- The consultation with neighbours involved Geolyse calling and speaking with all neighbours on 12-13 February. It is relevant to note that no objections/submissions from neighbours were received following Council’s notification of the DA.

2.15 Rehabilitation and Closure

- Section 3.2 provides detail on rehabilitation. Specific rehabilitation details and plans would be provided in a Rehabilitation Plan.

2.16 General Requirements

- The commercial viability of the expansion is a consideration for Ausrock Quarries Pty Ltd as the development proponent.
- The mitigation measures proposed are not generic; they are specific and fit for purpose.
- The EIS describes how the quarry would operate and what mitigation measures would be adopted as part of its entire operation. The proponent has no objection to the surrendering of the existing consent.
- There is no proposed extraction or new development activity within 40 m of waterfront land (refer EIS Figure 25).

2.17 Justification of proposal

Geolyse are of the view that the EIS is fit for purpose and does not contain assessment deficiencies, incorrect conclusions or inadequate mitigation measures. The EIS has been prepared in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*; the statement contains all available information that is relevant to the environmental assessment of the proposal; and the information contained in the statement is neither false nor misleading.

3 Conclusion

The EIS adequately addresses the SEARs, it is consistent throughout and the assessment of impacts has been completed cognizant of relevant policies and guidelines.