



Response to Submissions - Relocation of the Administration Centre at the Calga Sand Quarry

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Compiled by:



R.W. CORKERY & CO. PTY. LIMITED

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Prepared by:

Rocla Materials Pty Ltd
ABN: 30 083 169 091
RMB 1215 Peats Ridge Road
CALGA NSW 2250

Telephone: (02) 4375 1151
Facsimile: (02) 4375 1171
Email: john.gardiner@rocla.com.au

Prepared in conjunction with:

R.W. Corkery & Co. Pty. Limited
Geological & Environmental Consultants
ABN: 31 002 033 712

Brooklyn Office:

1st Floor, 12 Dangar Road
PO Box 239
BROOKLYN NSW 2083

Telephone: (02) 9985 8511
Facsimile: (02) 9985 8208
Email: brooklyn@rwcorkery.com

Orange Office:

62 Hill Street
ORANGE NSW 2800

Telephone: (02) 6362 5411
Facsimile: (02) 6361 3622
Email: orange@rwcorkery.com

Brisbane Office:

Level 19, 1 Eagle Street
BRISBANE QLD 4000

Telephone: (07) 3360 0217
Facsimile: (07) 3360 0222
Email: brisbane@rwcorkery.com

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CONTENTS

	Page
ENVIRONMENT PROTECTION AUTHORITY (EPA).....	1
GOSFORD CITY COUNCIL (GSC).....	2
NSW OFFICE OF WATER (NOW).....	2
DIVISION OF RESOURCES AND ENERGY (DRE).....	2
ROADS AND MARITIME SERVICES (RMS).....	2
PUBLIC SUBMISSION – CALGA PEATS RIDGE (CPR) COMMUNITY GROUP.....	5

PREAMBLE

This document assembles a series of responses to the issues raised in submissions by four State Government Agencies, Gosford City Council and the public relating to the proposed relocation of administration centre at Calga Sand Quarry. The proposal to relocate the administration centre was outlined and its environmental impact assessed in an Environmental Assessment (EA) placed on the DP&I website on 26 January 2012. Each relevant issue has been reproduced in this document with an individual response provided.

It is noted at the outset that some members of the public incorrectly suggested the proposed relocation of the wash plant and its associated operational components should have been assessed in the document. The relocation of the wash plant was assessed in the 2004 EIS but its relocation has been delayed till 2012 due to the depressed status of the building industry. The EA included some relevant references to the wash plant given its juxtaposition to the proposed relocated administration centre.

Issue / Response
ENVIRONMENT PROTECTION AUTHORITY (EPA)
Issue 1: Recommended Conditions of Approval
A. The Environment and Protection Authority (EPA) understands the proposed modifications and has no objection. The EPA has provided Recommended Conditions of Approval for this proposal.
Response <i>Noted – See Responses to Issues 1 and 2 below.</i>
B. Administrative Conditions: Works to be undertaken in accordance with information supplied. 1. Except as provided by these recommended conditions of approval, the works and activities shall be undertaken in accordance with the proposal contained in: - The s75W modification application regarding DA94-4-2004 as submitted to the NSW Department of Planning and Infrastructure; - The document "Environmental Assessment for the Relocation of the Administration Centre at the Calga Sand Quarry prepared by R.W. Corkery & Co. Pty Limited and dated January 2012. Unless otherwise specified in these conditions of approval.
Response <i>Accepted</i>
Operational Conditions: Chemical Storage - All above ground tanks containing material that is likely to cause environmental harm must be bunded or have an alternative spill containment system in place. - All bunds must be impervious and sized to contain at all times 110% of the largest container stored within the bund. - All above ground tanks must be designed and constructed in a manner which prevents the ingress of rain or water into the tanks. - All tanks must be clearly labelled to identify their contents. Erosion and Sediment Control - Stormwater at all areas of the premises which has the potential to mobilise sediment and other material must be controlled and diverted through appropriate sediment and erosion control and/or pollution control measures/structures to prevent the pollution of waters. - Sediment and erosion control and/or pollution control measures/structures must be maintained at all times to prevent the pollution of waters. Aboriginal Cultural Heritage In the event that surface disturbance at either demolition or construction sites identify a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the object(s). The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) (managed by OEH) and the management outcome for the site included in the information provided to the AHIMS.
Response <i>Noted – All of the above operational conditions are accepted although it is noted that both the demolition and construction sites are within the approved quarry footprint and are fully disturbed. Hence, there is no possibility of locating a new Aboriginal object – Consequently, this conditional requirement is unnecessary.</i>

Issue / Response
GOSFORD CITY COUNCIL (GSC)
Issue 2: General Response
Gosford City Council raises no objection to the proposal other than it requests the Department to ensure the replacement bore does not adversely impact on the Somersby aquifer.
Response <i>Noted – Rocla accepts Council's conditional requirement.</i>
NSW OFFICE OF WATER (NOW)
Issue 3: General Response
NOW has reviewed the EA and has no objections to the proposal. Should any amendments to the water management system be required, the Site Water Management Plan should be updated accordingly. The decommissioning and relocation of the bore used for potable water supply will require assessment and approval by NOW.
Response <i>Noted – All necessary approvals regarding the relocated bore will be submitted to NOW.</i>
DIVISION OF RESOURCES AND ENERGY (DRE)
Issue 4: General Response
The proposed relocation raises no concern from the Mineral Resources Branch. There are no issues in the EA relevant to the interests of DPI Agriculture, Fisheries and Forests NSW.
Response <i>Noted</i>
ROADS AND MARITIME SERVICES (RMS)
Issue 5: General Response
The RMS has reviewed the information provided and would have no objections to the proposed development modification.
Response <i>Noted</i>
PUBLIC SUBMISSION – ANNETTE AND STEVE WILBY
Issue 6: Non Compliance Regarding Water Licences
'We are somewhat surprised this relocation of the administration centre can be considered when there is an outstanding problem regarding water with this quarry. This has been ongoing for some time now.'
Response <i>Discussions between the Department of Planning and Infrastructure (DP&I) and R.W. Corkery and Co Pty Ltd (RWC) prior to the lodgement of the application and supporting Environmental Assessment (EA) determined that the relocation of the administration centre would be assessed under a separate application with an EA not related to other activities within Calga Sand Quarry or the proposed Southern Extension. The relocation of the administration centre was assessed by the NSW Office of Water (NOW) with no objections issued. Notwithstanding the above position, Rocla has purchased water licences with a recorded water volume of 77ML. These licences are as follows.</i> i. WAL 2541 – 6 units ii. WAL 20019 – 26 units iii. WAL 27185 – 15 units iv. WAL 17384 – 10 units <i>The latter licences were acquired in 2012</i>

Issue / Response
PUBLIC SUBMISSION – AUSTRALIAN WALKABOUT WILDLIFE PARK (AWWP)
Issue 1: Impact on Surrounding Residences
A. 'It is important to note that the EA suggests that Walkabout Park is situated only south of Darkinjung Road, whereas Walkabout Park extends all the way along Peats Ridge Road (ALL of property 'S' in Figure 3.1).'
Response <i>It is noted that both parcels of land referred to are owned by the Australian Wildlife Walkabout Park (via C.J. Barnard), however, the Park itself is currently defined by an electrified fenced boundary south of Darkinjung Road.</i>
B. 'Walkabout Park's daytime and overnight visitors may be impacted. Tourists visiting the wildlife park should be able to sleep peacefully until a reasonable 'I'm on holiday' time in the morning, and to enjoy the quiet ambience of the bush when they are awake ... Walkabout Park's daytime and overnight visitors may be impacted.'
Response <i>Noise monitoring at the AWWP has demonstrated that the $L_{Aeq15min}$ noise levels of the quarry-related activities including the wash plant in its current location do not exceed the recorded L_{A90} levels by more than 5dB(A). Furthermore, the relocation of the administration centre (and wash plant) to the rehabilitated quarry floor will further reduce noise emissions as the lower elevation and surrounding quarry faces will shield the surrounding residences including the owner's residence on the AWWP.</i> <i>The noise levels resulting from the proposed relocation of the administration centre (and wash plant) would result in lower noise levels than if the administration centre (and wash plant) were not moved at all. Considering that monitored noise levels are not exceeded at present, it is clearly expected the proposed relocated operations would not increase noise levels.</i>
C. 'The EA does not cover the potential effects of resiting the wash plant.' 'The EA does not cover the potential effects of truck and internal haulage vehicle traffic to and from the wash plant.'
Response <i>There is no requirement for the EA to assess the impacts of the relocated wash plant as the wash plant and traffic travelling to and from the plant were previously assessed in the 2004 EIS. Inclusion of the information on the proposed relocated plant in the EA was simply to provide the context between both the relocated plant and new administration centre which are now proposed to be relocated generally concurrently.</i>
D. The EA does not discuss the pros and cons of various new location options for the wash plant.
Response <i>As discussed above, the relocation of the wash plant and mortar sand plant has previously been approved and is shown in the EA to be generally located in the area of the 2004 EIS. In any event, it was Rocla's preferred approach a range to consider an optimisation process with respect to all relevant variables rather than considering options for the plant location.</i>
Issue 2: Sewage
A. 'Walkabout Park is worried that the new sewage disposal will contaminate the local water supply. We are especially concerned because the sewage will be dealt with in the bottom of an old quarry crater where flood waters can collect and cause the system to overflow, and even under normal conditions, sewage might contaminate the ground water, the creeks and, most devastating of all because it will impact everyone not just those of us downstream from the quarry, is the risk of the already damaged aquifer being contaminated.'

Issue / Response
Response <i>The new sewage disposal system within the relocated administration centre will be designed to satisfy Council's specifications. Council will no doubt ensure that the design is appropriate for its location – as it does throughout its entire LGA which has many systems adjacent to sensitive areas.</i> <i>Incidentally, it is worth noting that AWWP is <u>not</u> downstream of the Calga Sand Quarry, as claimed.</i>
B. 'Walkabout Park would like to see Council approval for an adequate sewage disposal system before this application to move the Administration Centre is allowed to go ahead.'
Response <i>This request is not appropriate given Council has the authority to issue the required approval without reference to adjoining landholders for proposals for a sewage disposal system.</i>
Issue 3: Noise and Visual
A. 'The EA does not cover the potential effects of the new roads that will carry trucks and internal haulage vehicles ... Walkabout Park is particularly concerned about the noise and the visual impacts.'
Response <i>The 2004 noise assessment of the proposed operations considered noise from both internal haulage vehicles and road trucks. The proposed exit road from the quarry adjacent to the southern boundary will in fact provide a greater level of noise protection than the noise scenario assessed in 2004.</i> <i>As discussed in Section 3.3 of the EA, the relocated administration centre (on the quarry floor) would not be visible from any off-site location including the AWWP.</i>
B. 'Walkabout Park is concerned re the impact of demolition and construction noise. Although Rocla says they will warn residents before this occurs, the impact on our business (even if we know it is going to happen) is incalculable. Visitors experiencing the noise will go away and tell others that Walkabout Park is not a peaceful place to visit, causing loss of future business growth. Rocla should be required to agree to adequately compensate Walkabout Park if visitors are affected by the noise of demolition or construction.'
Response <i>Rocla (Page 23 of the EA) refers to notifying (not warning) residents of the period of demolition and construction noise. Rocla will conduct the demolition and construction activities through adopting the requirements of the Interim Construction Noise Guidelines. All persons in NSW have the right to demolish and construct approved buildings, structures, etc. provided they satisfy the above guidelines – which Rocla intends to do. As such, no compensation is appropriate if the short-term noise is identified at the AWWP, i.e. above the already very audible traffic noise from the F3 Freeway and Peats Ridge Road.</i>
C. 'If the traffic noise especially the noise of trucks struggling up the steep incline in low gear, affects Walkabout Park visitors, Rocla should be required to adequately compensate Walkabout Park.'
Response <i>Trucks will not "struggle" up the exit road from the quarry. Furthermore, they will not be required to stop/start in the currently approved location. The 2004 Noise Assessment has previously assessed trucks travelling from the quarry floor to the quarry entrance. Hence, it has not been necessary to reassess this component in this document. Rocla is required to demonstrate through compliance modelling that the new configuration for the processing operations and relocated administration centre comply with the relevant noise criteria.</i>
D. 'Walkabout Park is also concerned that the new road system will be visible to visitors to Walkabout Park and will impair their experience. Walkabout Park requests that this be properly assessed as the topography of the land is such that even the existing wash plant at a 2km distance is visible from Walkabout Park. If the road system as proposed will be visible from Walkabout Park, Rocla should be required to redesign it so that it isn't.'

Issue / Response
Response <i>As discussed in Section 3.3, of the EA the relocated administration centre (on the quarry floor) would not be visible from any off-site location including the AWWP.</i>
PUBLIC SUBMISSION – TASSIN BARNARD
Note: Only those new issues not raised in the AWWP submission have been responded to in this section.
Issue: Noise, Visual and Compensation
A. From a personal point of view, my family lives on the premises of Walkabout Park. Already we are disturbed by noise from Rocla. Although noise levels have improved since Rocla upgraded their wash plant with rubber sound mufflers, the noise is still intrusive and, at times depending on what materials they are processing, is barely bearable. Any increase in noise is, therefore, of serious concern to me. In addition, Rocla's operating hours include Monday through Saturday which means, because of noise disturbance, we never get a chance to 'sleep in'. Rocla should not be allowed to make this worse.
Response <i>The concurrent relocation of both the wash plant and the administration centre <u>will</u> result in reduced noise levels. Noise levels <u>will not</u> be higher, as claimed.</i>
B. Rocla should be required to agree to compensate me if noise affects our quality of living.
Response <i>Rocla fully accepts compliance with the background $L_{A90} + 5\text{dB(A)}$ at the AWWP residence is fundamental to its operation at the Calga Sand Quarry. Noise measurements previously recorded at the AWWP residence have confirmed compliance and Rocla would be pleased, subject to access being granted, to add the AWWP residence to the quarterly monitoring program. In light of this past and predicted compliance, there is no need for any consideration of compensation.</i>
C. Rocla should be required to agree to compensate me if the quality of my water deteriorates.
Response <i>Firstly, no surface water flows from Rocla's property towards or onto AWWP.</i> <i>Secondly, the extensive monitoring undertaken and reported upon every year in the AEMRs for the Calga Sand Quarry demonstrate that groundwater levels and quality to the south and in all directions around the Quarry are not being affected by the quarry's activities. Therefore, concerns regarding deterioration of water quality are unfounded.</i> <i>It is further noted that any such claims for compensation can only be based upon independent test results of the bore on AWWP. The owners of the AWWP have refused access for Rocla to organise the independent testing and professional evaluation of the AWWP – hence compensation claims cannot be considered whilst access is refused.</i>
PUBLIC SUBMISSION – CALGA PEATS RIDGE (CPR) COMMUNITY GROUP
Issue 1: Wash Plant Coverage in EA
'The EA document says it is the "Environmental Assessment for the relocation of the Administration Centre". The title does not draw attention to the relocation of the Wash Plant. The content of the EA is confusing in this regard. The section "The Quarry Site and Extraction Stages" says that Rocla will "locate the new Wash Plant (as well as) the Administration Centre". However, the environmental effects of a new Wash Plant are not covered, and the Wash Plant is not shown in the various Figures ... If Rocla is proposing to move the Wash Plant, the impacts of doing so need to be thoroughly addressed in the EA.' The document should properly address the environmental impacts of the wash plants new position or its existing position to the new Administration Centre.

Issue / Response
Response <i>There is no requirement for the EA to assess the impacts of the relocated wash plant as the wash plant and traffic travelling to and from the plant were previously assessed in the 2004 EIS. Inclusion of the information on the proposed relocated plant in the EA was simply to provide the context between both the relocated plant and new administration centre which are now proposed to be relocated generally concurrently.</i>
Issue 2: Noise
A. 'Not mentioned in the EA is the new noise that will be generated if the Wash Plant is resited with the Administration Centre. Although the Wash Plant noise may be muffled if it is at the bottom of a pit with steep access and exit roads, there will be the added (and new) noise of the fully laden sand trucks struggling up and down the steep roads in low gear and with the need to gear up and down.'
Response <i>Trucks will not "struggle" up the exit road from the quarry. Furthermore, they will not be required to stop/start in the currently approved location. The 2004 Noise Assessment has previously assessed trucks travelling from the quarry floor to the quarry entrance. Hence, it has not been necessary to reassess this component in this document. Rocla is required to demonstrate through compliance modelling that the new configuration for the processing operations and relocated administration centre comply with the relevant noise criteria.</i>
B. If Rocla is proposing to move the Wash Plant along with the Administration Centre to the bottom of 'stage 2/3', the impact assessment must include the noise impact, additional fuel use and additional vehicle exhaust generated by the trucks as they traverse the steep access and exit roads down the escarpment into the pit in low gear and at all hours.
Response <i>The relocation of the wash plant to the quarry floor has previously been approved which in turn meant the transportation of the products from the quarry floor was previously assessed, i.e. with trucks travelling out of the quarry. Hence, there will be no substantive change that needs to be assessed.</i>
C. If Rocla is not proposing to move the Wash Plant along with the Administration Centre (2010 AEMR) despite them identifying the Wash Plant in the EA as being the greatest source of noise impact on neighbours, why not?
Response <i>Rocla proposes to concurrently relocate the wash plant and administration centre. It was indeed Rocla's intention to relocate the wash plant prior to 2012, however, realities must prevail in that the depressed state of the building industry in the Central Coast and Sydney has underpinned the delay in the relocation of the wash plant.</i>
D. The statement "The existing ambient noise levels would not be expected to change during the construction of the Administration Centre" (including the new road system) is not reassuring. Even if true (which we dispute), ambient noise levels do not reflect the actual experience of noise by neighbours.
Response <i>Ambient noise refers to noise from <u>all</u> sources including noise from Peats Ridge Road, F3 and activities on adjoining properties together with the normal noise from Rocla's operation. Hence, the statement remains appropriate.</i>
E. The noise of the existing quarry operations is already causing ongoing disturbance to the residence and business south of the quarry. Any construction or demolition work in the vicinity of the existing quarrying activity will clearly increase the noise impact on neighbours south of the quarry where noise levels are already at times at unacceptable levels.
Response <i>This issue has been previously addressed – see AWWP.</i>

Issue / Response
F. The statement that the “relocation should significantly reduce the opportunity for neighbours to distinguish project-related noise from the background noise on Peats Ridge Road and the F3 Freeway” is a furphy. Just because the neighbours are unsure which direction the noise is coming from, does not mean that the noise impact of the quarry will not increase.
Response <i>It remains a fact that the noise climate at residences surrounding the Calga Sand Quarry is dominated by traffic noise from the F3 and Peats Ridge Road. It is similarly a fact that noise levels will be lowered due to the relocation of the wash plant and administration centre. Hence, the conclusion/statement in the EA is correct.</i>
Issue 3: Project Life
A. ‘In the section “Project Life:” Rocla says that they have “five million tonnes of product left in Cell 3” thus justifying the need to build a larger Administration Centre. However, in 2005 they only had 5.8 million tonnes available. ‘Stage 3/3’ (previously approved as ‘stage 2’ which was exhausted by 2004) and ‘stage 3/1’ and ‘stage 3/2’ are now finished, and ‘stage 3/6’ is two thirds complete. There cannot be 5 million tonnes of material left in just ‘stage 3/4’ and ‘stage 3/5’ as this would mean that only 800 thousand tonnes had been removed to date, which is obviously not the case.’
Response <i>Rocla has reviewed its sand resource remaining within the remaining approved stages of the quarry and established the 5 million tonnes referred to in the EA was incorrect. The correct figure should be approximately 3.8 million tonnes.</i>
B. Unless Rocla is including production from the as yet not approved extension, there does not appear to be sufficient future volume to justify the need for a vastly expanded Administration Centre. Existing facilities have been sufficient for Rocla’s operations since 2002. Although Rocla has been running at around 50% capacity for some time, the existing Administration Centre was designed to cope with the full capacity production of 400,000 tonnes per year. If production volumes are not planned to increase above those originally anticipated, why does Rocla need to increase its environmental ‘footprint’ and, therefore, its environmental impact? One reads into this an anticipation of increased volume output. However, this is not possible as the sand resource of the existing operations is finite (and, as articulated in our previous paragraph, almost certainly vastly overstated at 5 million tonnes). The community is unclear as to why, even though there may be a legitimate need to relocate the Administration Centre, Rocla is also applying to expand its facilities so dramatically (e.g. 40 space parking area, showers, more toilets, increased building area with larger staff room and the consequential increased roof run-off, etc.)
Response <i>The ongoing operation of and sequence of operations within the Calga Sand Quarry relies upon the relocation of the administration centre. In relocating the administration centre and wash plant to the floor of the quarry, the opportunity presents itself for Rocla to consolidate parking on site in one location instead of the existing arrangements where parking occurs near the administration centre, processing area and on the quarry floor.</i>
Issue 4: Roads and Traffic
A. The Proposed Administration Centre is described as “office, amenities, light vehicle car park, storage shed and related facilities and infrastructure”. No mention is made of parking or waiting areas for large trucks. Most importantly, the road system (for road trucks, internal haulage and movement of heavy machinery, as well as the afore mentioned “light vehicles”) should be specifically included as the surface area disrupted for the road system far exceeds the surface area disrupted for the buildings and car park (see Rocla’s Figure 2.1) so is obviously significant.

Issue / Response
The resiting of the Administration Centre requires new roads that will, according to the EA, not only carry “light vehicles”, but will also carry “road-registered product trucks ... earthmoving equipment and internal haulage”. To state that “the formation of the internal roads usually involves a bulldozer simply pushing a new route to the required area” ignores the impacts of creating the roads, the roads themselves, and the vehicular traffic on these roads.
Response <i>There will be no requirement for truck parking as no trucks will be parked up at the quarry. Any truck waiting to be loaded will be waiting on the internal road network awaiting its turn to be loaded.</i> <i>The construction of the proposed road would not involve any additional equipment that is present either full-time or from time to time. Hence, the noise associated with road construction would be no different to extraction and related activities on site.</i>
B. Aside from the physical impact of the roads themselves, the noise and visual impact on surrounding residences and businesses must also be assessed.
Response <i>Noise and visual issues have been addressed in earlier responses.</i>
Issue 5: Aboriginal Cultural Heritage
Have all the impacted areas been subject to Aboriginal cultural assessment satisfactory to Darkinjung Land Council? Although most of the areas that will be affected have already been topographically changed, are there any remaining areas (however small) that may have cultural significance?
Response <i>No – no areas remain undisturbed.</i>
Issue 6: Wash Plant Relocation
‘Rocla, at Rocla Community Consultation Committee meetings, previously said their plan was to move the Wash Plant to ‘stage 3/1’ or ‘stage 3/2’. It is implied (although not specifically stated) in this EA that the Wash Plant will either be moved to ‘stage 2/3’, or that it will not be moved at all.’
Response <i>Rocla has always intended to move the wash plant to the quarry floor generally to the location nominated in the EA.</i>
Issue 7: Sewage and Waste Disposal
The Administration Centre obviously cannot go ahead without an acceptable sewage and waste disposal solution, so approval for the latter should be required before approval is given for the overall relocation.
This is particularly important as Rocla is not replacing ‘like with like’ when it comes to sewage and waste production and disposal, so there will have to be extensive due diligence in the process of assessing the new Administration Centre for approval, and it cannot be assumed that approval will be given.
With the addition of showers and an increase in the number of toilets and the larger lunch room and the new training facilities, all planned to cater for a greater number of personnel and visitors, not to mention the increased roof area, the sewage and waste volumes from the expanded Administration Centre will exceed current volumes.
Response <i>Rocla will seek approval for a sewerage treatment system considered appropriate for its use, i.e. the comparative size of the existing/proposed system is not relevant. What is important is its design.</i>
Considering the topography of the excavated quarry floor where the sewage and waste will be produced, at an elevation many meters below the level of the surrounding land, their discharge and disposal (at the bottom of this ‘pit’) should be of particular concern.
The risk of flood or excess water occurrence is almost inevitable in the light of Rocla having experienced a number of excessive surface water events over recent years due to heavy rainfall and runoff.

Issue / Response
Not only does surface water from the cut sides of the quarry pit seep through the walls into the pit even in normal conditions, but excessive rain water (a common occurrence in Calga) will flow directly into, and will collect in, the pit where it will almost certainly compromise sewage and waste disposal. The potential for flooding of the new facilities in the pit is far higher than the potential for flooding of the existing facilities which are at ground level, making contamination of surface, ground, aquifer and stream water highly likely. The risk of contamination of the drinking water of residences downstream of the quarry is not only high, but the effects would be devastating. Considering the aquifer has already almost certainly been fractured by quarrying activity, it is also possible that any overflow of sewage would find its way into the aquifer which even further reaching consequences.
Response <i>The new sewage disposal system within the relocated administration centre will be designed to satisfy Council's specifications. Council will no doubt ensure that the design is appropriate for its location – as it does throughout its entire LGA which has many systems adjacent to sensitive areas.</i>
Issue 8: Visibility
Rocla has not been clear as to whether the new road system and the traffic thereon will be visible to Peats Ridge Road and/or the neighbouring Walkabout Park (note the area labelled "S – CJ Barnard" on Rocla's Figure 3.1 is actually part of Australia Walkabout Wildlife Park and is adjacent to the proposed new road system).
Response <i>Vehicles using the new road adjacent to the northeastern would be visible from a comparatively short section of Peats Ridge Road and would not be visible from the Barnard Property north of the AWWP.</i>
Issue 9: Air Quality
The reference here appears to relate to air quality affecting neighbouring properties and, in this context, appears reasonable. However, no statement has been made as to the assessment of dust impacts on Rocla personnel. Would the topography effects concentrate dust levels in 'the pit'? Additional monitoring with a remedial plan should be considered for this unknown OH&S impact.
Response <i>Rocla has always and will continue to monitor the health of its employees and contractors at the frequency considered appropriate.</i>
Issue 10: Hazards
Security will be worse if all buildings are at the bottom of a 'pit' remote from the quarrying activities which continue along Peats Ridge Road. It will be far easier for anyone to access the actual excavation sites from Peats Ridge Road without being seen by personnel in the new Administration Centre at the distant end of the quarry and below ground level.
Response <i>The proposed closed circuit television at the front gate will overcome the problems envisaged by the community.</i>
Issue 11: Justification
The community questions whether the choice of site for the new Administration Centre is appropriate considering the complications of sewage and waste disposal, potential for water contamination, increased noise from the new and extensive road system, and the noise of the trucks traversing the steep incline to the new Administration Centre.
Response <i>The community has identified a number of design issues as "complications" yet Rocla considers that these issues have been appropriately reflected in the practical design of the centre.</i>

Issue / Response
Issue 12: Non-compliance of existing operations
A. Rocla has failed to demonstrate that they can comply with their current conditions of consent on a number of fronts. Most notably their ongoing and persistent use of water in excess of NOW's assessment of their allocation and usage Response <i>Discussions between the Department of Planning and Infrastructure (DP&I) and R.W. Corkery and Co Pty Ltd (RWC) prior to the lodgement of the application and supporting Environmental Assessment determined that the relocation of the administration centre would be assessed under a separate application with an Environmental Assessment (EA) to other unrelated activities within Calga Sand Quarry or the proposed Southern Extension. The relocation of the administration centre was assessed by the NSW Office of Water (NOW) with no objections issued. Notwithstanding the above position, Rocla has purchased water licences with a recorded water volume of 77ML. These licences are as follows.</i> <i>i. WAL 2541 – 6 units</i> <i>ii. WAL 20019 – 26 units</i> <i>iii. WAL 27185 – 15 units</i> <i>iv. WAL 17384 – 10 units</i> <i>The latter two licences were acquired in 2012.</i> <i>Rocla submitted a works approval with respect to i) and ii) above on September 2009. This application is <u>still</u> being “processed” by NOW.</i>
B. We question whether Rocla should be allowed to make any changes to their existing operations until they can demonstrate that they are able to, and prepared to, comply with (to quote Rocla) “all relevant statutory goals”. Response <i>Rocla is required to operate the Calga Sand Quarry in accordance with the development consent conditions which are periodically audited by external auditors and DP&I together with an internal audit reported in each AEMR. Importantly, it is noted that where non-compliances have been identified, there has been no environmental harm as a consequence. In many cases, the previous non-compliances identified have related to availability of documentation not held on site. Whilst ever the current approach is adopted, when the subject conditions are identified as non-compliant and remediable action implemented, it is appropriate for the quarry to continue operations (and modify) its activities, if approved.</i>
Issue 13: State Significance
When Rocla applied to commence the current operations in 2004 they stated that this quarry is absolutely necessary to keep up with Sydney's demand for sand. This appears to be a gross exaggeration. Producing an average of 200,000 tonnes of sand per year over 7/8 years, this caters to only 3% of Sydney's needs. On this basis, we question whether this application should be assessed by the Planning Department, or should rather be referred in its entirety to Gosford City Council. Response <i>The community's statement ignores the inescapable facts relating to the depressed construction and building industry in the Central Coast and Sydney over the past 5 years. A comparison of Rocla's production during a below average period with Sydney's average sand consumption is not valid. Finally, Rocla has no control over which agency is the Consent Authority for its operation. It is nominated in NSW legislation.</i>