

Submissions Report

Karuah Pit Consolidation Project
Modification 2 (MOD2)
Development Consent DA265-10-2004

Lot 21 DP1024341, Lot 11 DP1024564
& Lot 12 DP1024564

Andersite Road, Karuah

Prepared on behalf of Hunter Quarries Pty Ltd

Document Control Sheet					
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Unless otherwise specified in this report, information and advice received from external parties during the course of this project was not independently verified. However, any such information was, in our opinion, deemed to be current and relevant prior to its use. Whilst all reasonable skill, diligence and care have been taken to provide accurate information and appropriate recommendations, it is not warranted or guaranteed and no responsibility or liability for any information, opinion or commentary contained herein or for any consequences of its use will be accepted by ADW Johnson or by any person involved in the preparation of this assessment and report.

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Acknowledgement of Country

We, ADW Johnson, acknowledge the Traditional Custodians of the land where we live and work, the country of Awabakal, Darkinjung and the Eora Nation.

We recognise their continuous connection to the land and waters of our beautiful regions. We pay our respects to Aboriginal and Torres Strait Islanders Elders past, present and emerging.

Artwork created by Joe Griffin, a proud Aboriginal man, descendant of the Awabakal people.



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1.0 Introduction

1.1 Introduction

A Modification Application (DA265-10-2004-Mod-2) (MOD2), identified as the Karuah Pit Consolidation Project, was lodged with the NSW Department of Planning, Housing & Infrastructure (NSW Planning) on 18 May 2026 by Hunter Quarries Pty Ltd (HQPL) (the Applicant) to modify the State Significant Development (SSD) consent DA265-10-2004 for the Karuah Hard Rock Quarry under the provisions of Section 4.55(2) of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act).

The purpose of MOD2 is to enable the extraction of previously sterilised andesite resource from the remnant dividing highwall between the KHRQ and the adjoining Karuah East Quarry (KEQ) as well as within other disturbed / cleared areas from the site in a coordinated approach with the KEQ.

The Application (MOD2) has been lodged concurrently with a reciprocal Section 4.55(2) modification to the separate KEQ Development Consent (MP09_0175-MOD11) to facilitate the Karuah Pit Consolidation Project.

The Modification Application was publicly exhibited by NSW Planning between Friday 22 May 2026 to Tuesday 09 June 2026 (inclusive). The exhibition period provided opportunities for regulatory agencies, stakeholders and the general public to make submissions in relation to the Application.

On 10 June 2026, NSW Planning issued a letter to the Applicant requesting a written response to the issues raised in the submissions (both community and Government agency) received in relation to the MOD2 application.

This Submissions Report provides the Applicant's formal response to the submissions received during the exhibition period for the MOD2 application. The Submissions Report includes:

- A summary of submissions received;
- Details of actions taken since the exhibition period to address issues raised in submissions;
- A detailed summary of the Applicant's response to the issues raised in submissions; and
- An updated project justification.

This Submissions Report is prepared in accordance with DPE's *State Significant Development Guidelines – Preparing a Submissions Report March 2026*.

1.2 Project Overview

The Karuah Hard Rock Quarry (KHRQ) is located off the Pacific Highway (accessed via The Branch Lane interchange and Andersite Road), approximately 4 km northeast of the village of Karuah on the following lands:

- Lot 21 DP 102434 and Lot 11 DP 1024564 (the KHRQ site); and
- Lot 12 DP 1024564 (Conservation Offset Area).

Figure 1 below shows the location of the KHRQ and the adjoining KEQ in their local context within the Karuah Quarry Complex. In particular, the figure shows:

- The Karuah Hard Rock Quarry (DA 265-10-2004);
- The Karuah East Quarry (MP 09_0175);
- Proposed Karuah South Quarry (SSD 17_8795);
- The Eastern and Western Biodiversity Offset Areas established for the KEQ; and
- The Conservation Offset Area established for the KHRQ.

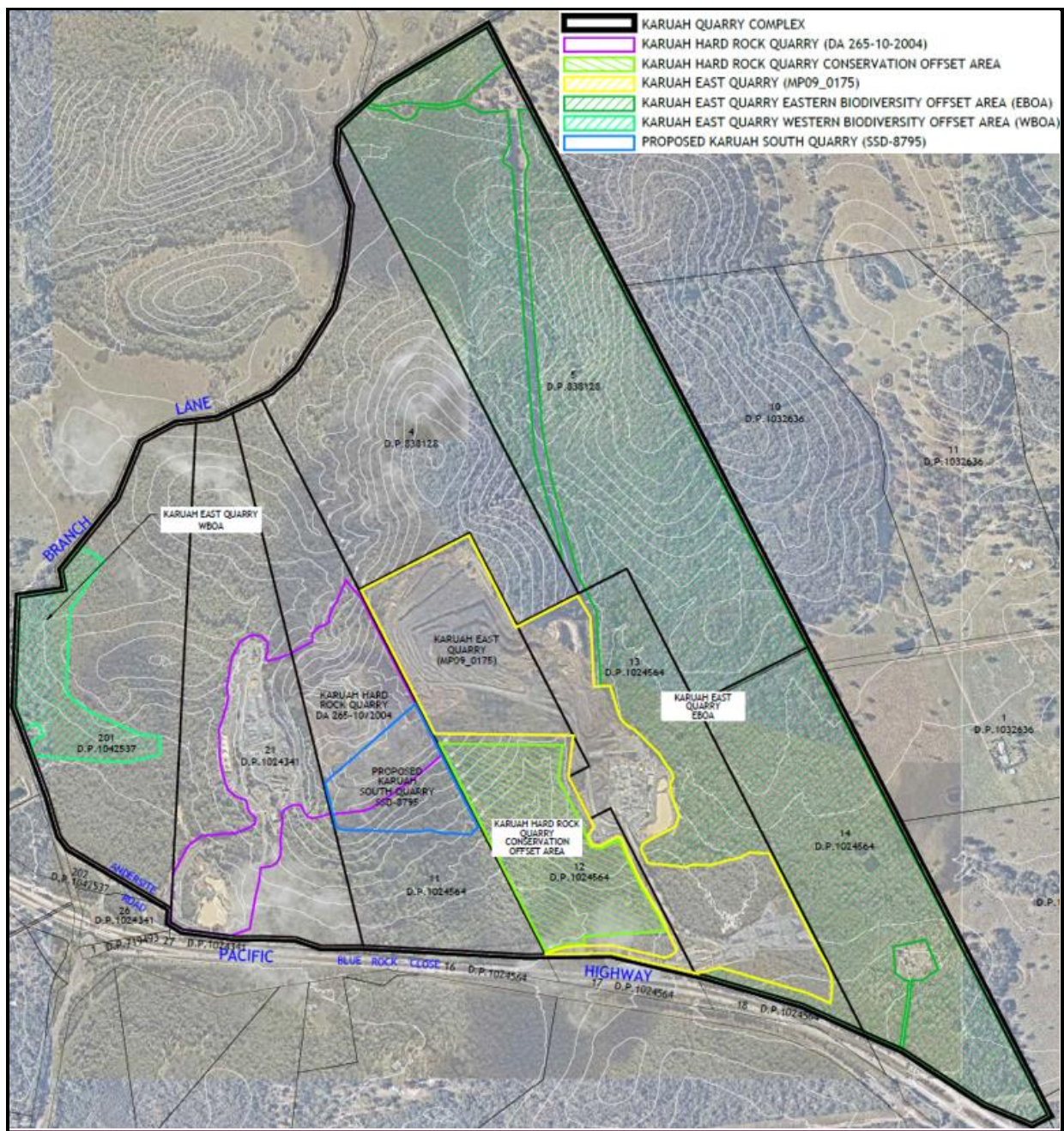


Figure 1: KHRQ in Context of Surrounding Lands, Existing Development & Other Proposed Development.

Development Consent DA265-10-2004 was granted for the KHRQ on 3 June 2005 under the provisions of 76A(7) of the EP&A Act 1979.

The key features of the Development Consent include:

- Implementing the remainder of the approved Stage 1 quarry operation and the Stage 2 extension of the quarry pit onto adjoining land of Lot 11;
- Upgrading and using the existing infrastructure at KHRQ to accommodate the extension;
- The extraction of up to 500,000 tonnes of material per year;
- Quarrying operation permitted for 22 years after the commencement of the consent (current cease date 3 June 2027);
- A total extraction limit of 11.2 million tonnes of andesite material over the period of the consent;
- The progressive rehabilitation of the quarry;
- The establishment of a Conservation Offset Area (COA) on the southern portion of Lot 12; and
- Surrender of any existing development consents and existing use rights associated with the site.

1.3 Background

The KEQ was approved to operate as a stand-alone quarry operation on lands adjoining the KHRQ, Lot 12 and Lot 13 DP 1024564, on 17 June 2014 (refer MP09_0175 (as amended)). The KEQ is well established and operational in accordance with MP09_0175 (as amended). The KEQ is operated by Karuah East Quarry Pty Limited (KEQPL), a company affiliated with HQPL, who operate the KHRQ.

During assessment of the KEQ application, one of the items that was considered by the Environment Assessment (ADW Johnson, January 2013) and NSW Planning's assessment was alternate ways to extract the known resource from Lot 12 and Lot 13 (which now contains the KEQ pit). At the time of preparation of the original KEQ application, one alternate option considered was extending the KHRQ from Lot 11 directly into Lot 12 and Lot 13; however, this was not possible because at that time HQPL only had rights conferred under specific licence terms with the landowner of Lot 11. The terms of the licence did not provide a legal right of way across Lot 11 for extraction of material within Lot 12 and Lot 13. Efforts were made by the Applicant to secure access across Lot 11; however, an agreement was unable to be achieved. Therefore, the Applicant had no other option than to pursue a stand-alone quarry on Lots 12 and 13 (the KEQ site).

The approval of the KEQ resulted in the side-by-side operation of two (2) independently operated quarries, being the KEQ and KHRQ, with a remnant dividing highwall located in between the quarry pits (refer to **Figure 1** above) consisting of sterilised material. This outcome was understood by HQPL and that the removal of the remnant structure could readily occur, subject to appropriate approvals. Lot 11 was recently acquired by the Applicant, eliminating previous land ownership constraints and the removal of the dividing highwall can now proceed.

Separately, it is noted that the former owner of Lot 11 previously submitted a separate SSD Application for the proposed Karuah South Quarry (SSD-8795) (KSQ) over part-Lot 11 which has not yet been determined. The KSQ proposal seeks to establish a third standalone quarry operation entirely on Lot 11 extracting remaining resource south of the current KHRQ extraction area.

Following acquisition of Lot 11 DP 1024564, HQPL (and affiliated companies) is also the proponent for the proposed KSQ. The following is noted:

- HQPL are currently reviewing the business case for the proposed KSQ;
- Any future amendment to the proposed KSQ project will be supported by updated documentation that accounts for the proposed Karuah Pit Consolidation Project; and
- If approved, KSQ will not commence operations until after operations at KHRQ have ceased.

1.4 Overview of Proposed Modification

The proposal seeks to modify the Development Consent for the KHRQ (DA10-265-2004) to achieve the following outcomes:

- Concurrently modify both the KHRQ and KEQ consents to extract the known resource contained within already disturbed areas of Lot 11, Lot 12 and Lot 13 including the dividing highwall, within the currently approved extraction depths of RL65 at KHRQ and RL45 at KEQ;
- Minor extension and overlap of extraction boundary of both KHRQ (into Lot 12) and KEQ (into Lot 11) extraction areas to holistically encompass the highwall structure, inclusive of appropriate safety offsets;
- Material sourced from the overlapping area of the CEA will be transported by internal haul road to either the KHRQ or KEQ for processing, stockpiling, sale and transport to market within currently approved throughput rates;
- Environmental safeguards incorporated into Management Plans that are in place for the KHRQ operation will be reviewed and updated to accommodate the proposal;
- An extension of the life of quarrying operations from 3 June 2027 to 31 December 2034 to align with the approved operational timeframe of the KEQ;
- Increase in approved total resource volume from 11.20 Mt to 13.20 Mt (18% increase);

- Application of contemporary noise and air quality conditions and associated criteria;
- Application of contemporary community engagement arrangements via the now established Joint Karuah Quarry Complex CCC;
- Extended operating hours to match the approved hours of operation of the adjoining KEQ;
- Changes to approved blasting activities as follows:
 - Change in blasting frequency from one (1) blast per week at KHRQ to a combined two (2) blasts per week in total between KHRQ and KEQ. This represents a cumulative reduction of one blast per week at the Karuah Quarry Complex (currently a cumulative total of three (3) blasts are approved to occur (two (2) at KEQ and one at KHRQ)).
 - Approved blasting hours are proposed to be extended by two (2) hours to occur between 9am and 5pm (Monday to Friday) to provide improved flexibility during blasting of the dividing highwall and align with proposed arrangements at KEQ.
- Revised final landform resulting in a free-draining landscape of the current extraction area, resulting in reduced geotechnical risks over the long-term and a landform with greater consistency with the existing surrounding environment.

No change is necessary to the Development Consent as it relates to annual extraction, processing and transport rates (capped at 500,000 tpa).

A concurrent and reciprocal Section 4.55(2) modification to the separate KEQ Project Approval (MP09_0175-Mod-11) has been submitted to NSW Planning to facilitate the Karuah Pit Consolidation Project.

An extract of the proposed MOD2 site plan is provided in **Figure 2** below.

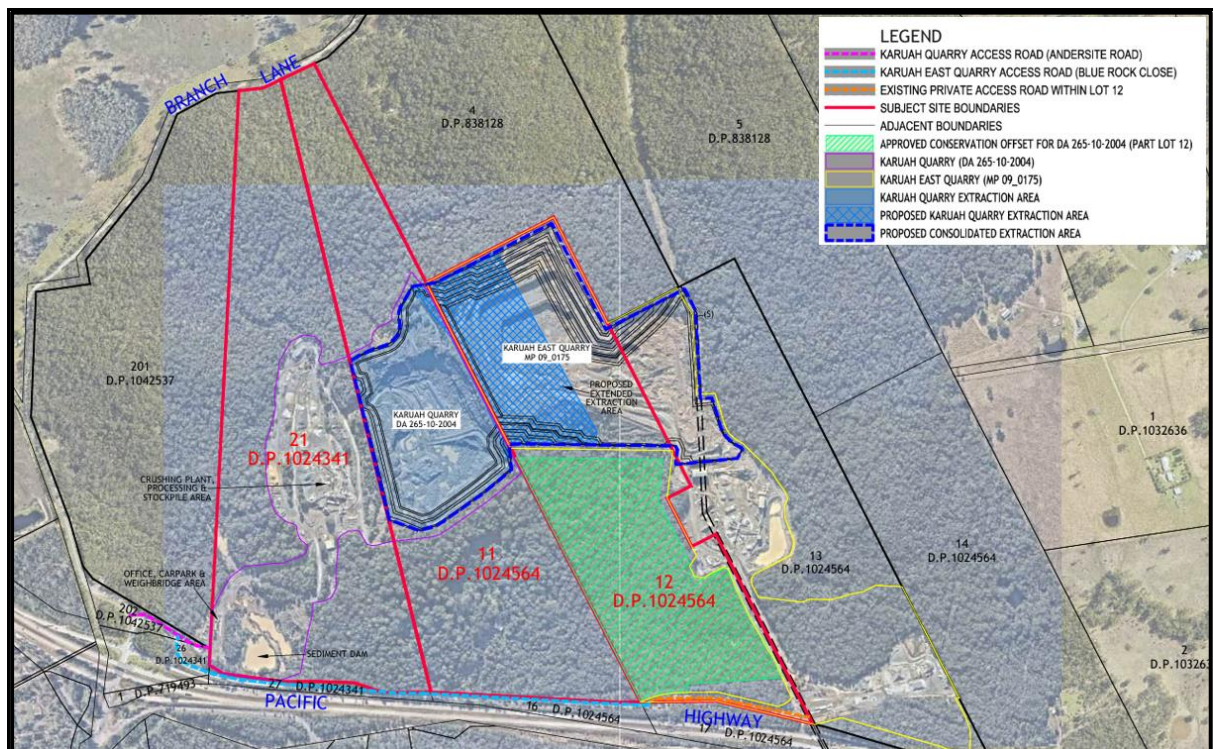


Figure 2: Extract of Proposed Site Plan for Karuah Hard Rock Quarry.

2.0 Analysis of Submissions

This section provides an analysis of submissions received during the exhibition of the proposed modification. Refer to **Appendix A** for a Submissions Register.

The Modification Application was publicly exhibited between Friday 22 May July 2026 and Tuesday 09 June 2026. During this time five (5) submissions were received from community groups and individuals. In addition, Nine (9) submissions were received from Government Agencies.

An overview of the submissions is provided below.

2.1 Government Agency Submissions

A total of nine (9) agency submissions were received and are summarised in **Table 1** below.

Table 1: Summary of Agency Submissions

Agency	Summary of Comments
NSW Department of Climate Change, Energy, the Environment & Water – Conservation Programs, Heritage & Regulation Group (CPHR)	No objection raised. Noted that in preparing the advice CPHR sought technical input on all matters concerning flooding and waterway health from the Marine, Coastal Estuaries and Flooding (MCEF) team within CPHR. CPHR confirmed it had no comment on MOD2.
NSW Department of Climate Change, Energy, the Environment & Water – Water Group	No objection raised. A combined response for both the KHRQ MOD2 and the concurrent KEQ MOD11 applications was provided noting that the recommendations were identical to each other. Recommendations were provided in relation to the following: Pre Determination NSW Planning should request: - The proponent install two (2) additional groundwater monitoring bores to the north and north-west of the proposed final quarry footprint. - The proponent revise the Water Management Plan to incorporate a dedicated Groundwater Management Plan sub -plan and to reflect the proposed changes to on -site surface water management. Post Approval NSW Planning should request: - The proponent maintain continuous access to all groundwater bores and promptly repair or reinstate any damaged infrastructure to ensure the bores remain fully operational. - An appropriate two-dimensional seepage analysis be completed for the site in its current form and to represent the anticipated final form following excavation. The seepage analysis should be submitted to DCCEE Water Group for review within six months of project approval. The above items are addressed in Table 4 below.

Agency	Summary of Comments
NSW Environment Protection Authority (EPA)	No objection raised and noted that the information supplied in the MOD2 application has allowed the EPA to undertake a complete assessment. Generally, supports the findings of the noise impact assessment, blast impact assessment, air quality impact assessment and surface water impact assessment. The following comments were provided: Matters to be Addressed with Conditions - Recommended varied EPL conditions regarding blasting frequencies / operating hours and noise monitoring arrangements. Matters for Consideration - Air Quality: The EPA noted the Air Quality Impact Assessment (AQIA) concluded the proposed modification is not expected to cause adverse impacts to sensitive receivers. The assessment also proposes the inclusion of assessment criteria for PM_{2.5} and 24-hour average criteria for PM₁₀ and PM_{2.5}. To support these changes, an updated monitoring program will be required, including the installation of an additional High Volume Air Sampler (HVAS), and two real-time air monitors. Accordingly, the EPA recommended that the proponent update its Air Quality Management Plan to reflect these revised requirements. The above items are addressed in Table 4 below.
Transport for NSW (TfNSW)	No objection to the proposal with clarifying detail requested. An identical response for both the KHRQ MOD2 and the concurrent KEQ MOD11 applications was provided. The following additional information was requested: - Sensitivity testing should be informed by the quarry's peak operational output capacities, rather than unsupported or outdated figures (from weighbridge data), to ensure traffic volumes accurately reflect maximum potential site activity. - Traffic distribution assessments for campaign-based operations, not restricted to movements associated only with current contracts. - Need for Austroads turn warrants assessments and traffic modelling to address existing and proposed impacts to the key classified road intersections using up-to-date background traffic counts and appropriate growth rates to determine the following scenarios: existing conditions, existing with any development changes and forecast conditions for the proposed 2034 end of quarry life year. - Baseline traffic conditions of the existing Karuah Quarry Complex developments and background traffic on the classified (State) road network, are unclear. - Cumulative traffic impacts on the broader road network from quarries within the region, in particular heavy vehicle movements, remain a concern for both the local community and TfNSW. These impacts should be appropriately assessed. - It is crucial to identify the baseline conditions, prior to introducing any further intensification of use, to understand any potential impacts to the efficiency and operation of the classified road network. - Impacts of heavy vehicles turn movements are yet to be sufficiently addressed at the key Pacific Highway/interchange intersections.

Agency	Summary of Comments
	a. Mid-block assessments are inadequate to address turning vehicle impacts at intersections. b. No existing intersection turn treatments have been identified for the classified road intersections. i. Assumptions regarding the interchange's swept path capability to accommodate heavy vehicles associated with the quarry developments does not replace the need for identifying existing turn treatments or undertaking turn warrant assessments and traffic modelling. 6. It is suggested that past approved development applications / modifications considered the suitability of the interchange for heavy vehicle movements, although: a. Past approvals mentioned are from 2005 and 2014, which were over 10 and 20 years ago and potentially no longer accurately reflect the existing background traffic volumes. b. It is unclear whether previous applications were referred to TfNSW or assessed for traffic impacts beyond the immediate local roads (as the current TTIS demonstrates). c. It is unclear what considerations were made in past applications. The above items are addressed in Table 4 below.
NSW Department of Climate Change, Energy, the Environment & Water – Heritage Council of NSW (Non-Aboriginal Heritage)	No objection or comments. Heritage Council of NSW noted that the proposed modification will result in a minor increase to the disturbance footprint of the quarry, and that no heritage items or areas of archaeological potential have been identified that would be affected by the proposal. <i>Note – An identical response for both the KHRQ MOD2 and the concurrent KEQ MOD11 applications was provided, with the reference to minor increase in the disturbance footprint being related to the KEQ MOD11 application.</i>
NSW Department of Climate Change, Energy, the Environment & Water – Heritage NSW (Aboriginal Heritage)	No objection. Heritage NSW noted that given the proposed modification can be undertaken within existing disturbed areas of the KHRQ and no additional clearing or land disturbance is necessary, it is unlikely that the proposal will have any impact on Aboriginal cultural heritage. On this basis, Heritage NSW had no comments.
NSW Department of Primary Industries & Regional Development (DPIRD) – Fisheries	No objection. Noted that the KHRQ footprint does not include, nor directly impact, any waterways or wetlands mapped by DPIRD Fisheries as key fish habitat. As a result, the risk to key fish habitat from the proposal is considered low. A low risk of indirect impacts to key fish habitat remains (noting that the site is located within the catchment of the Karuah River and Port Stephens (via Bulga and Yalimbah Creeks). Accordingly, DPIRD Fisheries recommended the continued implementation of best practice mitigation measures including erosion & sediment control and appropriate servicing and refuelling procedures for equipment & machinery, to prevent any potential contamination of groundwater and surface waters that may enter these waterways.

Agency	Summary of Comments
NSW Department of Primary Industries & Regional Development – NSW Resources	No objection. Noted that the Modification does not involve the recovery of Scheduled Minerals identified under Schedule 1 of the Mining Regulation 2016. Accordingly, NSW Resources has no comment.
NSW Resources Regulator	No objection. The Resources Regulator advised that it has no specific comments regarding mine safety matters in relation to the MOD2 proposal.

2.2 Public Submissions

A total of five (5) public submissions were received. Public submissions were received from one (1) community group and four (4) members of the public.

Of the submissions received, two (2) were in support of the proposed modification. The remaining three (3) submissions were in objection to the proposal.

All three (3) objections to the proposal were received from addresses within Limeburners Creek with the same known address for two (2) of the submissions (one (1) public submission and the submission from the Ironstone Community Action Group).

The public submissions received are further summarised below.

2.2.1 Community and Interest Group Submissions

Of the five (5) submissions received in total, one (1) letter of objection was received from a community and interest group, the Ironstone Community Action Group Inc.

2.2.2 Other Public Submissions

Of the five (5) submissions received in total, four (4) were received from other members of the public including two (2) objections and two (2) unique submissions of support.

2.2.3 Location of Public Submissions

Appendix B contains a figure (reproduced in **Figure 3** below) showing the location of submissions received from community and interest groups and other members of the public during the exhibition period, where the submitters location was advised.

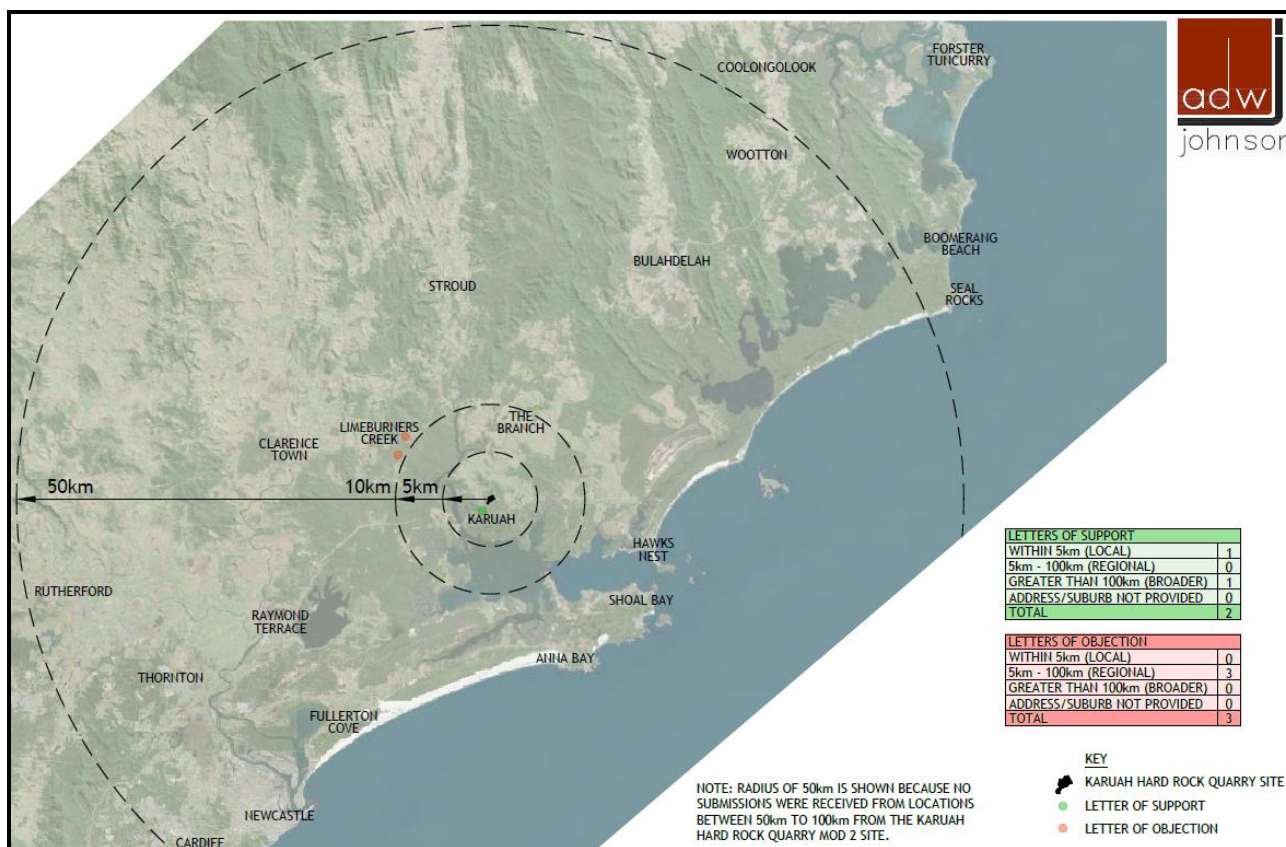


Figure 3: Public Submissions Location Plan.

Following is a breakdown of the location of public submissions, categorised in accordance with NSW Planning's *State Significant Development Guidelines – Preparing a Submissions Report March 2026*:

- One (1) submission was received from a resident within 5km of the subject site. This submission is a 'local' submission and it supports the proposed MOD2 application. No 'local' level objections were received;
- Three (3) objections were received (one (1) from a community group and two (2) from community members) from locations greater than 5km but less than 100km from the site. These submissions are 'regional' submissions. It is noted that each of these submissions were from Limeburners Creek which is located in excess of 10km from the subject site. It is noted that one of the resident submissions shares the same address as the registered addresses of the community group; and
- One (1) submission of support was received from outside of 100km from the subject site.

2.2.4 Categorisation of Issues

In accordance with NSW Planning's *State Significant Development Guidelines – Preparing a Submissions Report March 2026* matters raised in public submissions have been classified into the following categories:

- The Project;
- Procedural Matters;
- Economic, Environmental and Social Impacts of the Project;
- Justification and Evaluation of the Project as a Whole; and
- Issues beyond the scope of the project or not relevant to the project.

Table 2 below summarises the objections raised by public submissions. A summary of submissions of support for the proposed modification is provided within Table 3.

Table 2: Summary of Public and Community/Interest Group Objections

CATEGORY	SUB-CATEGORY	SUMMARY OF ISSUES RAISED
The Project	Key Uses & Activities	General objection to the proposal.
	The Project Area	Confusion regarding pit names and the location of the highwall to be removed.
Procedural Matters	Public exhibition	The need to object to two (2) separate applications is unfair to the community.
		The public exhibition period should have been 28 days per modification application (and should be extended to 28 days) and the exhibition periods should not have occurred concurrently.
		No advance warning of the exhibition period was provided. The community were notified on the first day of the submission period.
Economic, Environmental and Social Impacts	Ecology	The proposed modification includes the removal of 10.8ha of vegetation and a disturbance area of 28.1ha. This will be detrimental to native flora and fauna.
	Air Quality	The proposed modification will result in additional dust impacts.
	Noise	The proposed modification will result in additional noise impacts.
	Blasting	The proposed modification, including the extension of blasting times from 3pm to 5pm will result in toxic blast fumes.
		Increased blasting times from 3pm to 5pm will increase air quality and water quality impacts.
		Increased blasting hours should not be supported.
		A resident of Limeburners Creek requested to be added to blasting register.
	Water Quality	Increased blasting activity will generate dust which will impact water quality.
	Traffic	The proposed modification will result in increased heavy vehicle traffic as a result of increased extraction and product availability. This will put pressure on the local road network. This will result in increased trucks on the Pacific Highway which is already dangerous as a result of current truck sizes and numbers.
		Damage to road surfaces by heavy vehicles will be caused.
	Visual Impact	Concern regarding the visual impacts of the proposal.
	Amenity	The proposed development will result in increased impacts to nearby residents.
		Increased blasting times will increase quality of life impacts.
	Health	Cumulative impacts of traffic, air quality and noise are unacceptable.
		The proposal will result in adverse health impacts.
Justification and Evaluation	-	No comments raised.
Issues beyond the scope of the project	-	No representatives from NSW Planning, NSW EPA or HQPL have visited the objectors' Limeburners Creek property to respond to blasting, blast fumes / air quality, water quality and health concerns previously raised and no documentation has been produced. No compensation has been offered for house modifications, capped drinking water tanks and air purifiers.

CATEGORY	SUB-CATEGORY	SUMMARY OF ISSUES RAISED
		Objection to the ongoing operation of both the KEQ and KHRQ.
		Mitigation of actual health impacts as a result of current quarry operations is required prior to approval.
		Adverse amenity impacts from existing operations including dust, noise, blasting fumes and blasting vibration.
		The Limeburners Creek resident is not advised of scheduling of upcoming blasts which is dangerous to any person on their property and animals / wildlife.
		The approved MOD 10 KEQ application allowed expansion into a biodiversity offset area.
		Around 2014 a boundary adjustment was approved without any public exhibition.
		Any proposals involving extended disturbance areas should not be subject to a streamlined approval.
		The community were not notified for MOD's 1 – 9.
		HQPL staff have dismissed previous complaints in relation to current operations.
		The community has been robbed of an Independent Planning Commission (IPC) (formerly PAC) hearing for the proposed Karuah South Quarry.
		Environmental impacts of the Deep Creek Quarry approval.
		Traffic safety on Forest Glen Road associated with other quarry operations.
		The proposed quarry at Maytoms Lane Booral should be refused due to ecology and waterway impacts.
		ARDG Stone Ridge Quarry will destroy Wallaroo State Forest from Italia Road and destroy creek systems.
		Eagleton Quarry will destroy bushland Italia Road to Six Mile Road and join the Boral Quarry. Boral / Seaham quarry is destroying bushland.
		Eagleton Quarry should be shut down.
		The NSW Planning Portal is difficult to navigate and designed to stop people from making objections. Mandating the use of the portal should not be allowed.

Table 3: Summary of Public Submissions of Support

CATEGORY	SUB-CATEGORY	SUMMARY OF ISSUES RAISED
The Project	Key Uses & Activities	Support for the project.
Procedural Matters	-	No matters raised.
Economic, Environmental and Social Impacts	Amenity	A submission received by a local resident advised that HQPL have been operating in the location for more than twenty years and supports their continued operation subject to ongoing compliance with relevant conditions and guidelines.
Justification and Evaluation	Government Plans	Quarry and quarry products are essential.
Issues beyond the scope of the project	-	No matters raised.

3.0 Actions Taken Since Exhibition

3.1 Introduction

This section summarises the actions taken by the Applicant since the public exhibition of the proposed MOD2 development.

3.2 Engagement

3.2.1 Community Engagement

As was outlined within Section 5.8 of the Section 4.55(2) Modification Report, the proposed Karuah Pit Consolidation Project was introduced to the Joint Karuah Quarry Complex Community Consultative Committee (CCC) for both KHRQ and KEQ at an extraordinary meeting held on 3 November 2025. Overall, there was a general level of support from the CCC for the proposal.

Upon commencement of the exhibition period for MOD2, the CCC was notified by the Applicant and provided with details on how to make a submission. It is noted that one (1) member of the CCC, a local resident, made a submission of support for the proposal.

3.2.2 Agency Engagement

No consultation was undertaken with agencies post public exhibition of the MOD2 application.

The responses provided within this Submissions Report (as well as the Updated Summary of Mitigation Measures Provided within **Appendix C**) are considered to appropriately respond to all matters raised – refer to **Table 4** below).

3.3 Further Assessment of Impacts

3.3.1 Groundwater

The NSW DCCEEW – Water Group provided a number of pre and post determination recommendations as detailed in **Table 4** below. Identical comments were provided for both MOD2 and the separate MOD11 (KEQ) application.

The author of the Groundwater Assessment (EMM, 14 April 2026) has reviewed the DCCEEW – Water Group recommendations and provided a response (refer to **Appendix D** of this Submissions Report).

The recommendations made by DCCEEW Water have generally been accepted with some minor suggested changes that can be dealt with during development of an updated KEQ Groundwater Management Plan post determination (to cover the entire CEA between KEQ and KHRQ consistent with current arrangements).

A detailed response to each recommendation is provided in **Table 4** below.

3.3.2 Traffic & Transport

The MOD2 proposal seeks to extend the life of the KHRQ from 3 June 2027 to 31 December 2034 and to extend hours of operation to align with the KEQ. Annual extraction rates are not proposed to change.

The separate MOD11 application to the KEQ does not seek to change annual extraction rates, hours of operation or life of quarry. Accordingly, there will be no additional heavy vehicle traffic generated to or from the KEQ site that has not already been assessed as part of the current KEQ approval.

For completeness, a Traffic & Transport Impact Statement (TTIS) was undertaken to inform both the KHRQ MOD2 Modification Application and the KEQ MOD11 Modification Application (as well as a peer review and response to pre-lodgement comments made by TfNSW (refer to Section 6.4 of each Section 4.55(2) Modification Report).

Following review of the TTIS and peer review / response, Transport for NSW (TfNSW) have requested additional clarifying information in relation to peak operation output capacities; traffic distribution; Austroads turn warrants and modelling for existing and proposed impacts to key classified road intersections using contemporary traffic counts and application of growth rates; baseline traffic conditions associated with the existing KHRQ and KEQ.

Intersect Traffic has undertaken additional traffic counts and analysis of the local and State road network used by quarry vehicles (refer to **Appendix E**) as requested by TfNSW. The outcomes of the additional analysis and response to the matters raised by TfNSW are provided within **Table 4** below, which confirm that the proposed development is suitable in terms of traffic and transport considerations.

3.3.3 Noise

The NSW EPA were generally satisfied with the outcomes of the concurrent NIA's completed for both quarry operations (MOD2 for KHRQ and MOD11 for KEQ), subject to the application of increased monitoring frequency at the KHRQ from six-monthly to quarterly (as has been proposed by MOD2 application). This approach will align monitoring frequency at KHRQ with current practices at the adjoining KEQ and is supported by the Applicant.

The NSW EPA provided recommended varied licence conditions for EPL 11569 as well as for EPL 20611 (KEQ) post determination of MOD2 (and concurrent MOD11 to the KEQ).

The author of the NIA's, EMM has undertaken a review of the draft licence conditions (refer to **Appendix F**). The Applicant generally accepts the recommended conditions with some minor suggested amendments that will allow the establishment of a consistent set of quarterly noise monitoring locations that can be used to assess noise compliance holistically for both sites (KHRQ and KEQ) within a single quarterly monitoring program.

As recommended by the NSW EPA, the adjustments to EPL 11569 can be formalised post determination of the MOD2 application (and concurrent KHRQ MOD2 application).

The outcomes of the assessment and response to the matters raised by TfNSW are provided within **Table 4** below.

3.4 Project Amendments

No Project Amendments were necessary to respond to any Government Agency or community submissions.

An updated summary of Mitigation Measures has been provided (refer to **Appendix C**) to respond to commentary by NSW DCCEE – Water Group. The key change being that a commitment is provided confirming that groundwater management and monitoring arrangements will be accommodated within a revised standalone KEQ Groundwater Management Plan to cover the entire CEA between KHRQ and KEQ consistent with current arrangements. The following is noted (refer to **Appendix C** (Updated Mitigation Measures) of the concurrent the KEQ MOD11 Submissions Report Updated Summary of Mitigation Measures):

1. A standalone KEQ Groundwater Management Plan will be prepared within 6 months of determination of the concurrent modification applications (MOD2 to DA265-10-2004 and MOD11 to MP09_0175).
2. Commitment to install two (2) new monitoring bores (on Lot 11 DP 1024564 and Lot 5 DP838128) as shown in **Figure 4** below to be completed within 18 months of determination of the concurrent MOD2 and MOD11 applications.
3. Until items 1 and 2 above have been completed, extraction will be limited to the current approved extraction areas at KHRQ and KEQ and the 'Proposed Highwall Extraction Area' within the CEA on Lot 11 and Lot 12 DP1024564 as shown in **Figure 5** below.

4. Commitment to update the KEQ Groundwater Management Plan to include the following:
 - a. An adaptive management framework, establishing clear commitments to maintain the integrity of the monitoring network. This includes the repair or replacement of damaged monitoring bores; and the installation of replacement bores prior to the decommissioning of any bores proposed to be impacted by quarry excavation or ancillary infrastructure projects in a reasonable sequence and timeframe.
 - b. An adaptive management framework, including ongoing groundwater monitoring and review of hydrogeological conditions during the quarry operations. Should monitoring identify groundwater levels approaching the extraction depth, or any evidence of groundwater interception, the need for seepage modelling and any additional measures will be reviewed and implemented as appropriate.



Figure 4: Location of Two (2) Additional Groundwater Monitoring Bores to be Installed.

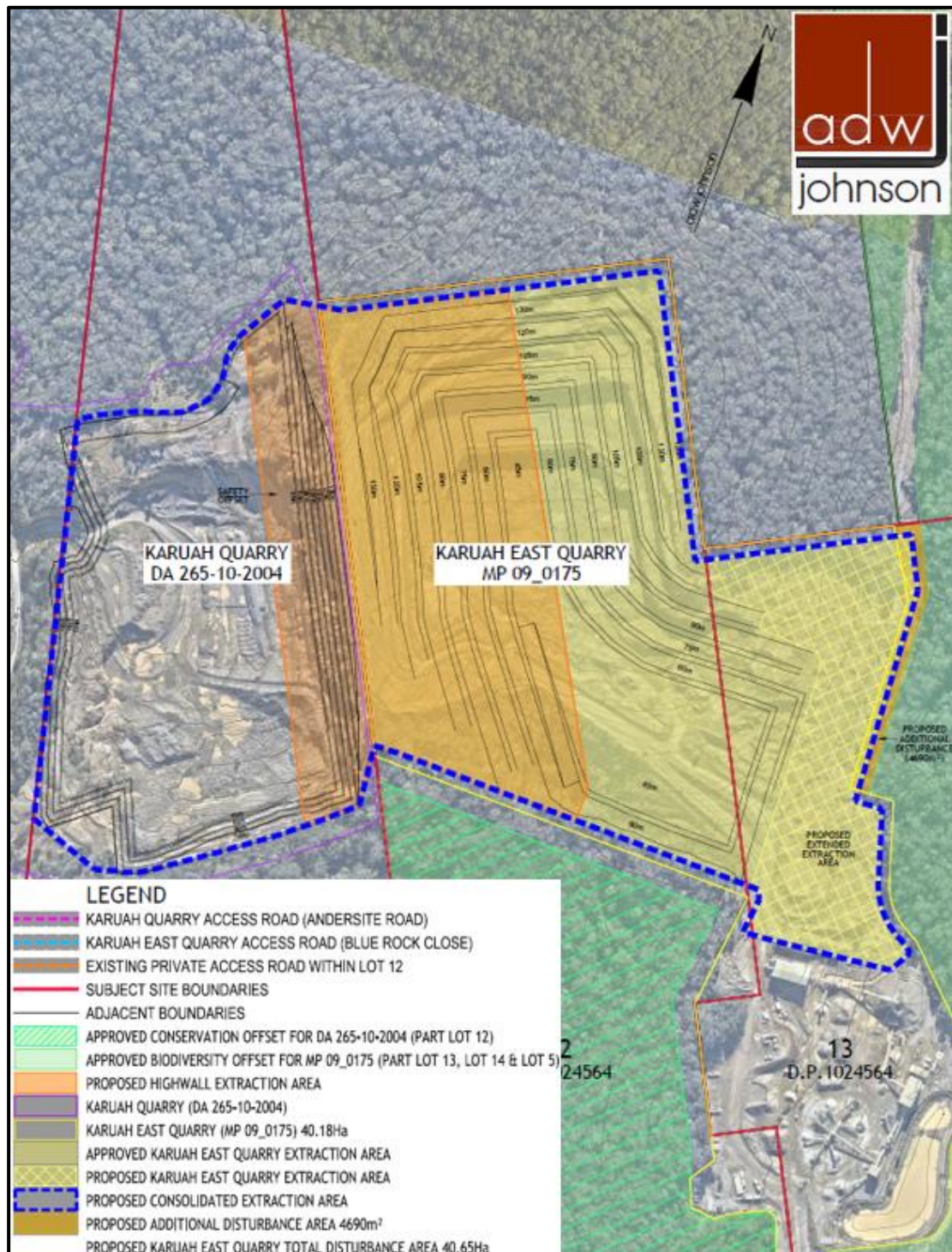


Figure 5: Location of Proposed Highwall Extraction Area within Proposed Consolidated Extraction Area.

4.0 Response to Submissions

This section provides a response to the comments contained within the submissions received by government agencies in relation to the proposed MOD2 development.

4.1 Agency Submissions

Table 4: Response to Agency Submissions

COMMENT	APPLICANT RESPONSE
NSW Department of Climate Change, Energy, the Environment & Water – Conservation Programs, Heritage & Regulation Group (CPHR)	
No objection raised.	Noted.
Noted that in preparing the advice CPHR sought technical input on all matters concerning flooding and waterway health from the Marine, Coastal Estuaries and Flooding (MCEF) team within CPHR.	
CPHR confirmed it had no comment on MOD2.	
NSW Department of Climate Change, Energy, the Environment & Water – Water Group	
No objection raised.	Groundwater management and monitoring arrangements will be accommodated within a revised standalone KEQ Groundwater Management Plan to cover the entire CEA between KHRQ and KEQ consistent with current arrangements.
Pre Determination NSW Planning should request: - The proponent install two (2) additional groundwater monitoring bores to the north and north-west of the proposed final quarry footprint, to ensure groundwater levels below the proposed floor level of RL 45 mAHD are adequately characterised and monitored. - The proponent revise the Water Management Plan to incorporate a dedicated Groundwater Management Plan sub-plan and to reflect the proposed changes to on-site surface water management.	Refer to Section 3.4 above and Appendix C (Updated Summary of Mitigation Measures) of the corresponding KEQ Submissions Report.

COMMENT		APPLICANT RESPONSE																																			
Post Approval NSW Planning should request: The proponent maintain continuous access to all groundwater bores and promptly repair or reinstate any damaged infrastructure to ensure the bores remain fully operational. An appropriate two-dimensional seepage analysis be completed for the site in its current form and to represent the anticipated final form following excavation. The seepage analysis should be submitted to DCCEE Water Group for review within six months of project approval.																																					
NSW Environment Protection Authority (EPA)																																					
No objection raised. Generally, supports the findings of the noise impact assessment, blast impact assessment, air quality impact assessment and surface water impact assessment. The NSW EPA provided matters to be addressed with conditions and matters for consideration.																																					
Matters to be Addressed with Conditions																																					
Recommended conditions of consent were provided for amendments to the blasting frequency and hours and noise limits.																																					
Noise Limits L5.1* Noise generated at the premises must not exceed the noise limits in the table below. <table><tr><th>Noise Assessment Location</th><th>Morning Shoulder LAeq (15 min)</th><th>Morning shoulder LA max</th><th>Day LAeq (15 min)</th><th>Evening LAeq (15 min)</th></tr><tr><td>A (74 Mill Hill Close, Karuah, Lot 100 DP 1028885)</td><td>35</td><td>52</td><td>40</td><td>40</td></tr><tr><td>B (64 Mill Hill Close, Karuah, Lot 3 DP785172)</td><td>35</td><td>52</td><td>43</td><td>43</td></tr><tr><td>C (54 Mill Close, Karuah, Lot 1 DP 785172)</td><td>35</td><td>52</td><td>41</td><td>41</td></tr><tr><td>D (827 Tarean Road, Karuah, Lot 250 DP 1092111)</td><td>35</td><td>52</td><td>43</td><td>43</td></tr><tr><td>E (789 Tarean Road, Karuah, Lot 22 DP 1024341)</td><td>35</td><td>52</td><td>40</td><td>38</td></tr><tr><td>All other residences</td><td>35</td><td>52</td><td>40</td><td>35</td></tr></table> *Note: Condition numbering reflects numbers within EPL 11569 and were provided by the NSW EPA for representative purposes only.		Noise Assessment Location	Morning Shoulder LAeq (15 min)	Morning shoulder LA max	Day LAeq (15 min)	Evening LAeq (15 min)	A (74 Mill Hill Close, Karuah, Lot 100 DP 1028885)	35	52	40	40	B (64 Mill Hill Close, Karuah, Lot 3 DP785172)	35	52	43	43	C (54 Mill Close, Karuah, Lot 1 DP 785172)	35	52	41	41	D (827 Tarean Road, Karuah, Lot 250 DP 1092111)	35	52	43	43	E (789 Tarean Road, Karuah, Lot 22 DP 1024341)	35	52	40	38	All other residences	35	52	40	35	The recommended EPL noise limits for KHRQ are accepted by the Applicant. It is noted that the recommended noise limits are consistent with the findings of the NIA.
Noise Assessment Location	Morning Shoulder LAeq (15 min)	Morning shoulder LA max	Day LAeq (15 min)	Evening LAeq (15 min)																																	
A (74 Mill Hill Close, Karuah, Lot 100 DP 1028885)	35	52	40	40																																	
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E (789 Tarean Road, Karuah, Lot 22 DP 1024341)	35	52	40	38																																	
All other residences	35	52	40	35																																	

COMMENT	APPLICANT RESPONSE
Noise Limits • L5.2* Noise limit definitions - For the purpose of the above table, the following definitions apply: • a. Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sunday and Public Holidays; • b. Morning Shoulder is defined as the period from 5:00am to 7:00am Monday to Saturday; • c. Evening is defined as the period from 6:00pm to 10:00pm Monday to Saturday. • L5.3* The noise limits set out in this licence apply under all meteorological conditions except for the following: • a. Wind speed greater than 3 metres/second at 10 metres above ground level; or • b. Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or • c. Stability category G temperature inversion conditions. • L5.4* To determine compliance with the noise limits set out in the table above, the licensee must locate monitoring equipment: • a. within 30 metres of a dwelling façade (but not closer than 3 metres) where any dwelling on the property is situated more than 30 metres from the property boundary that is closest to the premises; • b. approximately on the boundary where any dwelling is situated 30 metres or less from the property boundary that is closest to the premises; • c. at the most affected point at a location where there is no dwelling at the location; and • d. within approximately 50 metres of the boundary of a national park or nature reserve. Note: A non-compliance of the Noise Limits table will still occur where noise generated from the premises in excess of the appropriate limit is measured:	The recommended EPL noise conditions L5.2 – L5.5 for KHRQ are accepted by the Applicant.

COMMENT	APPLICANT RESPONSE
i. at a location other than an area prescribed in part (a) and part (b); and/or ii. at a point other than the most affected point at a location. L5.5* For the purposes of determining the noise generated at the premises the modification factors in Fact Sheet C of the EPA's "Noise Policy for Industry" must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment. *Note: Condition numbering reflects numbers within EPL 11569 and were provided by the NSW EPA for representative purposes only.	
Noise Monitoring To assess compliance with the noise limits for this premises attended noise monitoring must be undertaken in accordance with all noise conditions and: - during a period of normal quarry operations; - at each one of the locations listed in the noise limits table of this licence; - occur quarterly in the reporting period; - occur during each day period as defined in the NSW Noise Policy for Industry. Note: Quarterly attended noise monitoring must be completed (unless otherwise agreed by the Planning Secretary) to determine whether the development is complying with the relevant conditions of this consent. The frequency of noise monitoring will be reviewed, upon request.	The author of the NIA, EMM has undertaken a review of the draft recommended EPL conditions for both KHRQ (EPL11569) and KEQ (EPL 20611), refer to Appendix F. The Applicant has some minor suggested amendments to facilitate the establishment of a consistent set of quarterly noise monitoring locations that can be used to assess noise compliance holistically for both sites (KHRQ and KEQ) within a single quarterly monitoring program. The recommended adjustments in Appendix F are provided for the EPA's information and the Applicant will refine this at the time the EPLs for KHRQ and KEQ are varied to incorporate the MOD2 and MOD11 developments respectively.
Blasting L5.1* Blasting in or on the premises must only be carried out between the hours of 9.00am to 5.00pm Monday to Friday. No blasting is permitted on Saturdays, Sundays or public holidays. Blasting outside of the hours specified in this condition can only take place with the written approval of the EPA. *Note: Condition numbering reflects numbers within EPL 11569 and were provided by the NSW EPA for representative purposes only.	The Applicant accepts the draft blasting condition.
Matters for Consideration The NSW EPA provided matters for consideration relevant to Air Quality.	

COMMENT	APPLICANT RESPONSE
Air Quality: The EPA notes the Air Quality Impact Assessment (AQIA) concluded the proposed modification is not expected to cause adverse impacts to sensitive receivers. The assessment also proposes the inclusion of assessment criteria for PM_{2.5} and 24-hour average criteria for PM₁₀ and PM_{2.5}. To support these changes, an updated monitoring program will be required, including the installation of an additional High Volume Air Sampler (HVAS), and two real-time air monitors. Accordingly, the EPA recommends that the proponent update their Air Quality Management Plan to reflect these revised requirements.	It is noted that, consistent with the revised monitoring program recommendations within the AQIA, the NSW EPA have concurred that the following updates are appropriate as part of an updated Air Quality Management Plan (within the Environmental Management Strategy & Monitoring Program) to be completed post determination of MOD2): - The installation of one (1) additional high volume air sampler (HVAS) measuring PM_{2.5} at the current HVAS PM₁₀ and TSP location. - Two (2) real-time air quality monitors capable of measuring PM₁₀ and PM_{2.5} and positioned on opposites sides of the combined KEQ and KHRQ sites. The Applicant has committed to implementing an updated monitoring program.
Transport for NSW (TfNSW)	
No objection to the proposal with clarifying detail requested. Intersect Traffic have prepared a response to the matters raised by TfNSW, which is provided in Appendix E.	
The following additional information was requested: 1. Sensitivity testing should be informed by the quarry's peak operational output capacities, rather than unsupported or outdated figures (from weighbridge data), to ensure traffic volumes accurately reflect maximum potential site activity.	The Traffic & Transport Impact Statement (TTIS), submitted as part of both the MOD2 and MOD11 applications, was developed on the basis of applying conservative assumptions to determine the maximum (or peak) output capacity of each quarry (KHRQ and KEQ) as restricted by weighbridge capacity at each quarry. This approach has been applied in the context of: - very low overall total vehicle movements, - heavy dominance of quarry-related traffic, and - exclusive use of Andersite Road and Blue Rock Close by the Applicant (i.e. no other premises or landholdings are accessed). Accordingly, the purpose of providing the weighbridge data in the TTIS was to provide evidence of what the maximum capacity is (i.e. 70 vtpm with 35 loaded exit movements and 35 return movements at KEQ). A further allowance for services vehicles was included (i.e. 10 vtpm with 5 inbound movements and 5 outbound movements). <i>Note – The weighbridge at KEQ utilises a more time-efficient site layout and processing system than KHRQ and therefore this has been conservatively adopted as the maximal output for KHRQ.</i>

COMMENT	APPLICANT RESPONSE
	The TTIS was therefore conservatively based on a maximum traffic generation potential of 80 vtp/h at each quarry. 80 vtp/h is generated by KEQ (Blue Rock Close) which is doubled to 160 vtp/h to determine the total maximum traffic output (i.e. Andersite Road, The Branch Lane and the Pacific Highway Interchange). An extract of the TTIS is provided below: <i>Weighbridge data for the first six months of 2025, provided from Hunter Quarries for the existing KEQ indicates a maximum dispatch capacity of 35 vehicles (2nd June 2025) which would indicate that the likely peak hour traffic generation would be a worst-case scenario of approximately 80 vtp/h based on maximum weighbridge capacity, local delivery site and some light vehicle traffic from the site.</i> <i>Based on this advice and the results of the traffic counts undertaken for this assessment a peak hour traffic generation from each of the quarries of 80 vtp/h (88% heavy vehicles) has been adopted in this assessment. Therefore, the likely peak hour traffic volumes on the adjacent local road network providing access to the quarries would be in the order of:</i> <i>Andersite Road – 160 vtp/h; and</i> <i>Blue Rock Close – 80 vtp/h.</i> Further sensitivity analysis is not necessary as it will not provide meaningful results as the KEQ weighbridge creates a physically-fixed upper limit for peak hour traffic generation combined with low overall traffic volumes on the adjoining road network. Modelling has been based on the maximum dispatch rate at the KEQ weighbridge (and conservatively applied to both quarries) which has been informed by representative weighbridge data. It is considered that there is minimal risk of sensitivity testing showing failure of the adjoining road network and is not warranted in this instance.
2. Traffic distribution assessments for campaign-based operations, not restricted to movements associated only with current contracts.	As a point of clarification, it should be noted that both the KHRQ and KEQ operate on a continuous basis in accordance with their approved hours of operation. Neither quarry operates on a campaign basis nor is it proposed to do so.

COMMENT	APPLICANT RESPONSE
	As noted in item 1 above, the TTIS is based on the maximum KEQ weighbridge capacity (and therefore considers maximum possible worst-case traffic frequencies during periods of high demand). Accordingly, given the highly conservative rates adopted, it is considered that the traffic generation and trip distribution assessments in the report are appropriate and do not require amendment.
3. Need for Austroads turn warrants assessments and traffic modelling to address existing and proposed impacts to the key classified road intersections using up-to-date background traffic counts and appropriate growth rates to determine the following scenarios: existing conditions, existing with any development changes and forecast conditions for the proposed 2034 end of quarry life year.	As requested by TfNSW, contemporary intersection counts were undertaken at the following locations on Thursday 2nd July 2026 (PM peak traffic period) and Friday 3rd July 2026 (AM peak traffic period): • Tarean Road / The Branch Lane & Andersite Road intersection; and the • Tarean Road northern interchange intersections. The counts undertaken identified the AM peak period to be 8 am to 9 am and the PM peak period varying between 1 pm and 3.15 pm indicating that the peak AM and PM traffic periods on the local road network are heavily influenced by quarry traffic. The results of these counts are provided in Appendix E. One (1) week traffic classifier counts were also recently undertaken on Andersite Road and Blue Rock Close between Monday 24th November 2025 and Sunday 30th November 2025. This data is provided in Appendix E. The resulting baseline (2026) two-way mid-block traffic volumes extracted from this traffic data are shown in Table 5 below, inclusive of heavy vehicle percentages. Please note that the end of proposed quarry life (December 2034) baseline traffic conditions are also included in Table 5 and have been predicted by adopting a background traffic growth rate of 2% compound per annum as recommended by TfNSW for situations of normal growth where background traffic growth cannot be determined due to the lack of historical data.

COMMENT

APPLICANT RESPONSE

Table 5: Two-Way Mid-Block Traffic Volumes

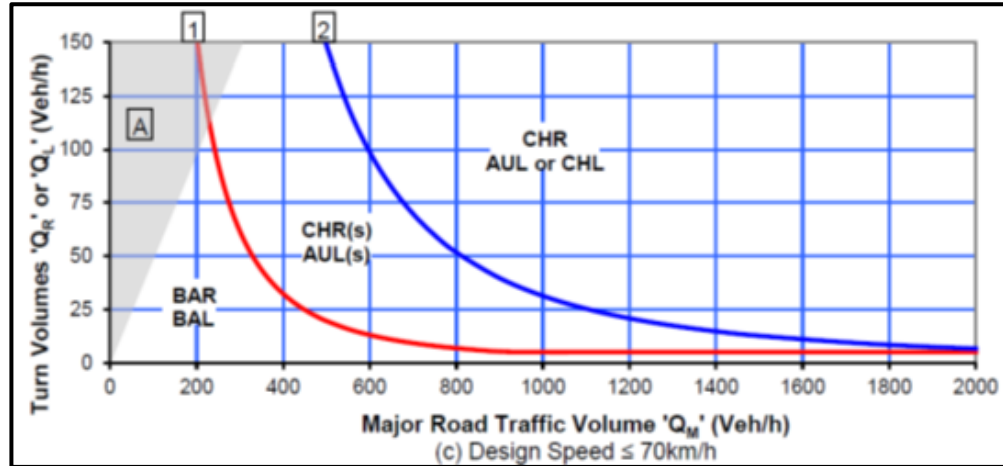
Road	Section	2026		2034 @ 2% p.a.	
		AM (vtph)	PM (vtph)	AM (vtph)	PM (vtph)
Tarean Road	south of Pacific Highway	99	126	116	148
Tarean Road	north of Pacific Highway	55	56	64	66
Tarean Road	south of Andersite Road	56	61	66	71
Andersite Road	east of Tarean Road (intersection count)	42	47	49	55
Andersite Road	east of Tarean Road (classifier count)	32	35	37	41
Blue Rock Close	east of Andersite Road (classifier count)	52	46	61	54
Andersite Road heavy vehicle percentage		18%	average		
Tarean Road north of Pacific Highway heavy vehicle percentage		34%	average		
Tarean Road south of Pacific Highway heavy vehicle percentage		9%	average		
Classifier count - 7 day result					
Andersite Road	heavy vehicle percentage 28% average				
Blue Rock Close	heavy vehicle percentage 37% average				

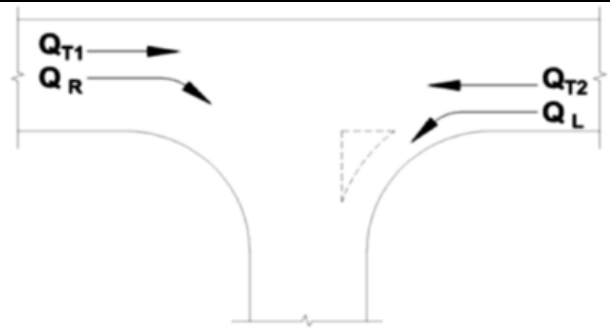
Analysis of this data confirms that the local road network is operating with extremely low two-way mid-block traffic volumes which are less than the thresholds for uninterrupted flow conditions at intersections as sourced from *Austroads Guide to Traffic Management Part 3 Traffic Studies and Analysis* and reproduced below.

Table 6: Intersection Volumes Which Capacity Analysis is Unnecessary

Type of road	Light cross and turning volumes maximum design hour volumes vehicles per hour (two way)		
Two-lane major road	400	500	650
Cross road	250	200	100
Four-lane major road	1000	1500	2000
Cross road	100	50	25

Noting that the Tarean Road / Branch Lane & Andersite Road intersection operates with major / minor flows of 38 vtph / 24 vtph and the Tarean Road / Pacific Highway interchange operates with major / minor traffic flows of 107 vtph / 52 vtph it is evident that the existing road network intersections near the quarry sites are currently operating with uninterrupted flow conditions with little (to no) delay for motorists. There is no increase in traffic intensity from the proposed development, therefore

COMMENT	APPLICANT RESPONSE																																	
	uninterrupted flow conditions at key intersection controls can be expected to continue through to the quarry end of life of 31 December 2034 (as is currently approved for KEQ (MP09_0175) and currently proposed under MOD2 (DA265-10-2004) for KHRQ). Therefore, it is reasonable to conclude the proposal does not adversely impact on the adjoining local road network. Due to the very low through traffic volumes on Tarean Road a turn lane warrant assessment in accordance with Austroads would not result in any warrant for dedicated turn lanes therefore the current layout is suitably safe and based on traffic volumes currently operate with little if any delay or safety concerns. Turn lane warrants are provided in <i>Austroads Guide to Traffic Management Part 6 – Intersections, Interchanges and Crossings Management</i> with the appropriate warrant graph reproduced below.  The graph plots Turn Volumes 'Q_R' or 'Q_L' (Veh/h) on the Y-axis (0 to 150) against Major Road Traffic Volume 'Q_M' (Veh/h) on the X-axis (0 to 2000). It features three main curves: a blue curve for 'CHR AUL or CHL', a red curve for 'CHR(s) AUL(s)', and a grey shaded area for 'BAR BAL'. A box labeled 'A' is located in the upper left quadrant. The graph is labeled '(c) Design Speed ≤ 70km/h'. <table><caption>Approximate data points from Figure 6</caption><tr><th>Major Road Traffic Volume 'Q_M' (Veh/h)</th><th>CHR AUL or CHL (Veh/h)</th><th>CHR(s) AUL(s) (Veh/h)</th></tr><tr><td>200</td><td>150</td><td>150</td></tr><tr><td>400</td><td>100</td><td>100</td></tr><tr><td>600</td><td>75</td><td>75</td></tr><tr><td>800</td><td>60</td><td>60</td></tr><tr><td>1000</td><td>50</td><td>50</td></tr><tr><td>1200</td><td>45</td><td>45</td></tr><tr><td>1400</td><td>40</td><td>40</td></tr><tr><td>1600</td><td>35</td><td>35</td></tr><tr><td>1800</td><td>30</td><td>30</td></tr><tr><td>2000</td><td>25</td><td>25</td></tr></table> Figure 6: Turn Lane Warrant Graph.	Major Road Traffic Volume 'Q _M ' (Veh/h)	CHR AUL or CHL (Veh/h)	CHR(s) AUL(s) (Veh/h)	200	150	150	400	100	100	600	75	75	800	60	60	1000	50	50	1200	45	45	1400	40	40	1600	35	35	1800	30	30	2000	25	25
Major Road Traffic Volume 'Q _M ' (Veh/h)	CHR AUL or CHL (Veh/h)	CHR(s) AUL(s) (Veh/h)																																
200	150	150																																
400	100	100																																
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800	60	60																																
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1400	40	40																																
1600	35	35																																
1800	30	30																																
2000	25	25																																

COMMENT	APPLICANT RESPONSE																															
	 <table><tr><th>Road type</th><th>Turn type</th><th>Splitter island</th><th>Q_M (veh/h)</th></tr><tr><td rowspan="3">Two-lane two-way</td><td rowspan="2">Right</td><td>No</td><td>= Q_T1 + Q_T2 + Q_L</td></tr><tr><td>Yes</td><td>= Q_T1 + Q_T2</td></tr><tr><td>Left</td><td>Yes or no</td><td>= Q_T2</td></tr><tr><td rowspan="3">Four-lane two-way</td><td rowspan="2">Right</td><td>No</td><td>= 50% x Q_T1 + Q_T2 + Q_L</td></tr><tr><td>Yes</td><td>= 50% x Q_T1 + Q_T2</td></tr><tr><td>Left</td><td>Yes or no</td><td>= 50% x Q_T2</td></tr><tr><td rowspan="3">Six-lane two-way</td><td rowspan="2">Right</td><td>No</td><td>= 33% x Q_T1 + Q_T2 + Q_L</td></tr><tr><td>Yes</td><td>= 33% x Q_T1 + Q_T2</td></tr><tr><td>Left</td><td>Yes or no</td><td>= 33% x Q_T2</td></tr></table> Figure 7: Calculation of the Major Road Traffic Volume Q_M. Noting Q_{MR} and Q_{ML} are less than 200 vtp/h at all nearby intersections, the turn lane warrant assessment determines that all intersections are suitably safe as BAR / BAL intersections with no requirement for specific right and left turn deceleration lanes.	Road type	Turn type	Splitter island	Q_M (veh/h)	Two-lane two-way	Right	No	= Q_T1 + Q_T2 + Q_L	Yes	= Q_T1 + Q_T2	Left	Yes or no	= Q_T2	Four-lane two-way	Right	No	= 50% x Q_T1 + Q_T2 + Q_L	Yes	= 50% x Q_T1 + Q_T2	Left	Yes or no	= 50% x Q_T2	Six-lane two-way	Right	No	= 33% x Q_T1 + Q_T2 + Q_L	Yes	= 33% x Q_T1 + Q_T2	Left	Yes or no	= 33% x Q_T2
Road type	Turn type	Splitter island	Q_M (veh/h)																													
Two-lane two-way	Right	No	= Q_T1 + Q_T2 + Q_L																													
		Yes	= Q_T1 + Q_T2																													
	Left	Yes or no	= Q_T2																													
Four-lane two-way	Right	No	= 50% x Q_T1 + Q_T2 + Q_L																													
		Yes	= 50% x Q_T1 + Q_T2																													
	Left	Yes or no	= 50% x Q_T2																													
Six-lane two-way	Right	No	= 33% x Q_T1 + Q_T2 + Q_L																													
		Yes	= 33% x Q_T1 + Q_T2																													
	Left	Yes or no	= 33% x Q_T2																													
4. Baseline traffic conditions of the existing Karuah Quarry Complex developments and background traffic on the classified (State) road network, are unclear. a. Cumulative traffic impacts on the broader road network from quarries within the region, in particular heavy vehicle movements, remain a concern for both the local community and TfNSW. These impacts should be appropriately assessed. b. It is crucial to identify the baseline conditions, prior to introducing any further intensification of use, to understand any potential impacts to the efficiency and operation of the classified road network.	As a point of clarification, it should be noted that there are no other quarries operating or approved to operate in the vicinity of the KHRQ and KEQ sites who utilise the same section of the road network to access the Pacific Highway. The KEQ and KHRQ are the only quarry developments, with no other landholders, that use Blue Rock Close and Andersite Road to access The Branch Lane & Tarean Road. Given that the proposal will not result in any intensification of traffic on these roads and there are no other traffic generating operations/premises that would contribute to cumulative impacts, no further cumulative impact assessment can be completed.																															

COMMENT	APPLICANT RESPONSE
	Any future quarry development that would access the above-mentioned road network would be subject to its own assessment process that would consider traffic and transport impacts. Whilst not specifically stated in the TfNSW correspondence, as confirmed within the TTIS (Section 6.0), there is currently an application under assessment by the NSW Department of Planning, Housing & Infrastructure (NSW Planning) for the proposed Karuah South Quarry (KSQ) (SSD-8795) on Lot 11 DP 1024564, which proposes access from Blue Rock Close. With its recent acquisition of Lot 11, HQPL are now the proponent for the KSQ application. There are no cumulative impacts from the proposed KSQ because, if approved, its operations will not commence until after KHRQ has ceased operation. It is also noted that Tarean Road by 2034 will have a maximum mid-block two-way traffic volume of approximately 150 vtp. This is contrasted against the two-way mid-block capacity of a rural two-way two-lane road of up to 1,400 vtp. Accordingly, Tarean Road is currently operating at only a nominal 10% capacity. Therefore, it has significant spare two-way mid-block capacity to cater for any future development in the area.
5. Impacts of heavy vehicles turn movements are yet to be sufficiently addressed at the key Pacific Highway/interchange intersections. - Mid-block assessments are inadequate to address turning vehicle impacts at intersections. - No existing intersection turn treatments have been identified for the classified road intersections. - Assumptions regarding the interchange's swept path capability to accommodate heavy vehicles associated with the quarry developments does not replace the need for identifying existing turn treatments or undertaking turn warrant assessments and traffic modelling.	As requested by TfNSW, swept path analysis for heavy vehicles was undertaken (conservatively modelled using a 25m long B-Double) at the following intersections (refer to Appendix E): - Karuah interchange – South On-Ramp; - Karuah Interchange – South Off-Ramp; - Karuah Interchange – North Off-Ramp; and - Karuah Interchange – North On-Ramp. All swept paths completed demonstrate compliance is readily achieved with no need for any intersection upgrades.
6. It is suggested that past approved development applications / modifications considered the suitability of the interchange for heavy vehicle movements, although:	The Applicant notes TfNSW's position and has completed the requested assessments where appropriate and where meaningful conclusions can be developed.

COMMENT	APPLICANT RESPONSE
a. Past approvals mentioned are from 2005 and 2014, which were over 10 and 20 years ago and potentially no longer accurately reflect the existing background traffic volumes. b. It is unclear whether previous applications were referred to TfNSW or assessed for traffic impacts beyond the immediate local roads (as the current TTIS demonstrates). c. It is unclear what considerations were made in past applications.	
NSW Department of Climate Change, Energy, the Environment & Water – Heritage Council of NSW (Non – Aboriginal Heritage)	
No objection or comments. Heritage Council of NSW understands that the proposed modification will result in a minor increase to the disturbance footprint of the quarry, and that no heritage items or areas of archaeological potential have been identified that would be affected by the proposal.	Noted. As a point of clarification, it is noted that MOD2 does not seek to increase the disturbance footprint of the KHRQ.
Heritage NSW (Aboriginal Heritage)	
No objection. Heritage NSW noted that given the proposed modification can be undertaken within existing disturbed areas of the KHRQ and no additional clearing or land disturbance is necessary, it is unlikely that the proposal will have any impact on Aboriginal cultural heritage. On this basis, Heritage NSW has no comments.	Noted.
NSW Department of Primary Industries & Regional Development (DPIRD) – Fisheries	
No objection. Notes that the KHRQ footprint does not include, nor directly impact, any waterways or wetlands mapped by DPIRD Fisheries as key fish habitat. As a result, the risk to key fish habitat from the proposal is considered low. A low risk of indirect impacts to key fish habitat remains (noting that the site is located within the catchment of the Karuah River and Port Stephens (via Bulga and Yalimbah Creeks). Accordingly, DPIRD Fisheries recommends the continued implementation of best practice mitigation measures including erosion & sediment control and appropriate servicing and refuelling procedures	Noted. The KHRQ Site Water Management Plan that applies to the KHRQ will be updated and ongoing implementation of erosion and sediment control; and servicing & refuelling procedures as required by the Management Plans will continue.

COMMENT	APPLICANT RESPONSE
for equipment & machinery, to prevent any potential contamination of groundwater and surface waters that may enter these waterways.	
NSW Department of Primary Industries & Regional Development – NSW Resources	
No objection. Notes that the Modification does not involve the recovery of Scheduled Minerals identified under Schedule 1 of the Mining Regulation 2016. Accordingly, NSW Resources has no comment.	Noted.
NSW Resources Regulator	
No objection. The Resources Regulator advises that it has no specific comments regarding mine safety matters in relation to the MOD2 proposal.	Noted.

4.2 Public Submissions

The table below provides a response to the public submissions received in objection to the proposed MOD2 development.

Table 7: Response to Public Objections

COMMENT/ISSUE RAISED	APPLICANT RESPONSE
The Project	
General objection to the proposal.	The proposed development is considered to be strongly justified and the outcomes of technical assessments undertaken to inform the application confirm that the proposal achieves compliance with all necessary standards and consent conditions (as proposed to be modified). The level of objection received is considered to be low (3 objections, all of which came from Limeburners Creek, with two from the same address) and matters raised in the objections are addressed by the Section 4.55(2) Report as well as this Submissions Report. It is noted that the only local submission (i.e. within 5km of the subject site), refer to Figure 3 above, is a letter of support. It is also noted that the Joint Karuah Quarry Complex Community Consultative Committee (CCC) (for both the KHRQ and KEQ), which includes representation from five (5) local residents, two (2) stakeholder groups (being the North Arm Cove Residents Association and the Port Stephens Shellfish Program) and MidCoast Council are generally supportive of the proposal.

COMMENT/ISSUE RAISED	APPLICANT RESPONSE
	Whilst a low number of regional objections was received, it is considered that there is a general level of support for the proposal from the local community.
Confusion regarding pit names and the location of the highwall to be removed.	Figure 4 of the Section 4.55(2) Report for the MOD2 proposal and Figure 4 of the Section 4.55(2) Report for the concurrent MOD11 (to KEQ) proposal clearly shows: • The location of the KHRQ; • The location of the KEQ; and • The location of the remnant dividing highwall to be removed. Furthermore, Section 3 of both Section 4.55(2) Modification Reports clearly describe the proposal relevant to each consent as well as providing a proposed site plan for each quarry (Figure 5 of the KHRQ s4.55(2) Modification Report and Figure 6 of the KEQ s4.55(2) Modification Report). The proposal is considered to clearly described and depicted.
Procedural Matters	
The need to object to two (2) separate applications is unfair to the community.	The proposed modification was exhibited by NSW Planning in accordance with the requirements of Schedule 1 of the <i>Environmental Planning and Assessment Act 1979</i>. Noting that members of the public have been able to review the proposal and lodge a submission (for both MOD2 to KHRQ and MOD11 to KEQ) and subsequently bring about the requirement for the Applicant to review and respond to matters raised, this demonstrates that the public exhibition period has achieved its purpose.
The public exhibition period should have been 28 days per modification application (and should be extended to 28 days) and the exhibition periods should not have occurred concurrently.	
No advance warning of the exhibition period was provided. The community were notified on the first day of the submission period.	
Economic Environmental and Social Impacts	
Ecology	
The proposed modification includes the removal of 10.8 ha of vegetation and a disturbance area of 28.1 ha. This will be detrimental to native flora and fauna.	No vegetation clearing is necessary to facilitate the MOD2 proposal and no new areas of additional disturbance are proposed. Proposed MOD2 will have no ecological impact. DA265-10-2004 currently only specifies an extraction footprint and does not formally specify a total disturbance footprint for the KHRQ. The MOD2 proposal will formalise a total disturbance area of 28.1ha (the current disturbance area in accordance with the current approval).

COMMENT/ISSUE RAISED	APPLICANT RESPONSE
<u>Air Quality</u> The proposed modification will result in additional dust impacts.	An Air Quality Impact Assessment (AQIA) was prepared to accompany the MOD2 Section 4.55(2) Modification Application in accordance with the NSW EPA document <i>Approved Methods for the Modelling and Assessment of Air Pollutants in NSW</i> and is detailed within Section 6.3 of the Section 4.55(2) Modification Report. The AQIA makes the following conclusions: - Proposed MOD2 will not cause adverse impacts with respect to dust considerations or deposition levels, based on modelling which confirms compliance with air quality assessment criteria at all sensitive receivers. - Post blast fume emissions are not expected to result in any adverse air quality impacts based on modelling which demonstrated compliance with air quality assessment criteria at all sensitive receivers. - Emissions from diesel exhausts associated with off-road vehicles and equipment are not expected to result in any adverse air quality impacts, based on modelling which demonstrated compliance with air quality assessment criteria at all sensitive receivers. - Modelling results at all sensitive receivers are sufficiently below the respective air quality assessment criteria which demonstrate that any uncertainties in the modelling would not change the outcomes of the assessment. The Applicant successfully implements an Air Quality Monitoring Program within the KHRQ Environmental Management Strategy & Monitoring Program, that can be readily updated to accommodate the MOD2 development. The MOD2 proposal will result in an improvement to air quality monitoring, which will consist of the following updates: - One (1) site specific meteorological station, at the current location. - Removal of Depositional Dust Gauges. - Provision of one additional HVAS monitor for PM_{2.5}, at the current location, for compliance purposes. - Two (2) real-time air quality monitors capable of measuring PM₁₀ and PM_{2.5} and positioned on opposite sides of the Karuah Quarry Complex site to allow for the calculation of development contributions to air quality for ongoing management purposes. The proposed development is considered to be acceptable in terms of Air Quality impact considerations and potential dust generation from the MOD2 proposal can be readily managed.

COMMENT/ISSUE RAISED	APPLICANT RESPONSE
Noise	
The proposed modification will result in additional noise impacts.	A Noise Impact Assessment was prepared for the MOD2 development and is detailed within Section 6.1 of the s4.55(2) Modification Report. The NIA included background noise monitoring and modelling to predict the noise impacts of the proposed development. The NIA concludes that noise emissions from the proposed MOD2 development will have a negligible impact and can be supported. Due to the predicted negligible noise impact, apart from updating the Noise Monitoring Program within the KHRQ Environmental Management Strategy & Monitoring Program to accommodate MOD2, no further noise mitigation is necessary. Ongoing noise monitoring will continue at the currently approved monitoring locations however the frequency of monitoring will be increased to quarterly monitoring (currently six-monthly monitoring is completed), to achieve consistency with the monitoring regime for the adjoining KEQ to provide greater compliance confidence and streamlined reporting processes. A contemporary operational noise criteria condition is proposed to be included into the KHRQ consent based on the outcomes of the NIA.
Blasting	
The proposed modification, including the extension of blasting times from 3pm to 5pm will result in toxic blast fumes.	As noted above, the AQIA considered post blast fume emissions. The outcomes off the assessment confirmed that post blast fumes emissions are not expected to result in any adverse air quality impacts based on modelling which demonstrates compliance with air quality assessment criteria at all sensitive receivers.
Increased blasting times from 3pm to 5pm will increase air quality and water quality impacts. Increased blasting hours should not be supported.	The MOD2 proposal seeks a minor two (2) hour increase in blasting activity from 3.00pm to 5.00pm Monday to Friday. As noted above, the AQIA considered post blast fume emissions and dust deposition levels associated with this minor increase in blasting times. The outcomes off the assessment confirmed that emissions are not expected to result in any adverse air quality impacts based on modelling which demonstrates compliance with air quality assessment criteria at all sensitive receivers. This outcome also confirms that there will be no dust related impacts on nearby properties that rely on tank water for potable purposes. Consideration of water quality is detailed below.

COMMENT/ISSUE RAISED	APPLICANT RESPONSE
A resident of Limeburners Creek requested to be added to blasting register.	Blasting at KHRQ is undertaken in accordance with the Environmental Management Strategy & Monitoring Program (EMS&MP) (which includes the implementation of a Blast Notification Register) and the Blast Control Plan. Residents within 2km of the KEQ are notified of upcoming blasting activity. It is considered appropriate to maintain this arrangement post determination of MOD2.
<u>Water Quality</u>	
Increased blasting activity will generate dust which will impact water quality.	As noted above, the AQIA considered dust deposition levels and confirmed that emissions are not expected to result in any adverse air quality impacts based on modelling which demonstrates compliance with air quality assessment criteria at all sensitive receivers. A Surface Water Assessment (SWA) was prepared as part of the MOD2 application (refer to Section 6.5 of the Section 4.55(2) Modification Report). The SWA considered the proposed surface water management system and sizing of sediment controls specifically for the proposed MOD2 project. The SWA confirmed that the MOD2 development does not require any significant departures from the approved and established general arrangement of KHRQ's surface water management system. Updates will include: • The approved KHRQ Site Water Management Plan will be updated to accommodate the MOD2 development. • The existing in-pit sump will be proportionally upgraded. • A bund wall will be constructed on the Lot 11/12 boundary for the extent of the extraction area at the time the KEQ is extracted to approximately RL65m. • During Stage 2 of the extraction sequence, strategic blasting is to be undertaken to maintain westward flows in KHRQ and eastward flows in KEQ. Erosion and sediment controls will be implemented in accordance with the Blue Book Volume 2E (Mines & Quarries).
<u>Traffic</u>	
The proposed modification will result in increased heavy vehicle traffic as a result of increased hours of operation, extraction and product availability. This will put pressure on the local road network. This will result in increased trucks on the Pacific Highway which is already dangerous as a result of current truck sizes and numbers.	The KHRQ Development Consent as it relates to annual extraction rates will not be affected by proposed MOD2. The KHRQ proposal does seek to extend the life of the KHRQ from 3 June 2027 to 31 December 2034 and also extend the hours of operation to achieve consistency with the KEQ. A Traffic & Transport Impact Statement (TTIS) was undertaken as part of the Modification Report as well as a peer review and response to pre-lodgement comments made by TfNSW (refer to Section 6.4 of the Modification Report).

COMMENT/ISSUE RAISED	APPLICANT RESPONSE
	Additionally, as part of this Submissions Report (refer to Table 4 above and Appendix E) further traffic assessment has been completed including contemporary traffic counts and further analysis of the local and State road network used by quarry vehicles. The assessments completed confirm that the proposed Karuah Pit Consolidation Project will not increase annual extraction rates or intensify existing development. The proposal will not change conditions on the local and state road network therefore will not adversely impact on the local and state road network.
Visual Impact Concern regarding the visual impacts of the modification was raised by a resident of Limeburners Creek.	One of the key benefits of the Karuah Pit Consolidation Project is the positive visual impact outcomes that will be generated, in particular by removal of the remnant dividing highwall located between the KHRQ and KEQ. Provided below is an extract from the VIA showing the existing view of the remnant highwall from the Pacific Highway (northbound) and a montage of the proposal (i.e. post removal). Figure 8: Existing View from Pacific Highway (northbound) & Indicative Montage of Proposal.

COMMENT/ISSUE RAISED	APPLICANT RESPONSE
	A Visual Impact Assessment (VIA) was prepared for the MOD2 development (refer to Section 6.7 of the Modification Report). The VIA confirms that due to local topography, existing vegetation, access and existing development, views to the KEQ are generally limited to less than 1,500m except for filtered views from further distances. The VIA concludes that the MOD2 proposal has a low to negligible visual impact, with a beneficial effect on the landscape, as the proposed works will eliminate most views of the site from surrounding areas. By removing views of the existing KHRQ, the proposed changes will enhance the visual character through better integration with the landscape. Further to the abovementioned findings of the VIA, the objector's residence is located approximately 11km to the north west of the KHRQ. Noting the findings of the VIA, it is highly likely that the only impact from the proposed MOD2 development will be the removal of the remnant dividing highwall, which will achieve a positive visual impact by better integrating the KHRQ with the surrounding landscape.
Amenity	
The proposed development will result in increased impacts to nearby residents. Increased blasting times will increase quality of life impacts. Cumulative impacts of traffic, air quality and noise are unacceptable.	It is noted that within the local context (i.e. 5km) of the proposed MOD2 development, no objections were received and one (1) letter of support was received. The MOD2 Section 4.55(2) Modification Report comprehensively considers all key amenity related impacts (including cumulative impacts) as follows: • Noise (Section 6.1 of the s4.55(2) Modification Report); • Blasting & Vibration (Section 6.2 of the s4.55(2) Modification Report); • Air Quality (Section 6.3 of the s4.55(2) Modification Report); • Traffic (Section 6.4 of the s4.55(2) Modification Report and Table 4 & Appendix E of this Submissions Report); • Visual (Section 6.7 of the s4.55(2) Modification Report); and • Surface Water Management (refer to Section 6.5 of the s4.55(2) Modification Report). The specialist reports confirm the MOD2 proposal is acceptable in terms of potential impacts and can be appropriately managed.
Justification and Evaluation	
No comments received.	N/A
Issues Beyond the Scope of the Project	

COMMENT/ISSUE RAISED	APPLICANT RESPONSE
No representatives from NSW Planning, NSW EPA or HQPL have visited the objectors' Limeburners Creek property to respond to blasting, blast fumes / air quality, water quality and health concerns previously raised and no documentation has been produced. No compensation has been offered for house modifications, capped drinking water tanks and air purifiers.	Comments not relevant to the MOD2 application. The KHRQ and KEQ operate in accordance with their respective development consents, secondary approvals and management plans.
Adverse amenity impacts from existing operations including dust, noise, blasting fumes and blasting vibration.	
Mitigation of actual health impacts as a result of quarry operations is required prior to approval.	
HQPL staff have dismissed previous complaints in relation to current operations.	
Objection to the ongoing operation of both the KEQ and KHRQ.	
The Limeburners Creek resident is not advised of scheduling of upcoming blasts which is dangerous to any person on their property and animals / wildlife.	Not relevant to the MOD2 application. Blasting at KHRQ is undertaken in accordance with its Environmental Management Strategy & Monitoring Program (EMS&MP) (which includes the implementation of a Blast Notification Register) and the Blast Control Plan.
The approved MOD 10 application allowed expansion into a biodiversity offset area.	Not relevant to the MOD2 Application. KEQ MOD 10 was granted approval on 18 May 2023 following a robust assessment by NSW Planning and other Government agencies.
Any proposals involving extended disturbance areas should not be subject to a streamlined approval.	Not relevant to the MOD2 application. It is presumed that this is a reference to the Streamlined Biodiversity Assessment Report (SBDAR) prepared as part of the separate MOD11 application for KEQ. The SBDAR approach is consistent with the Biodiversity Assessment Method (BAM) to assess biodiversity impact and offsetting obligation under the <i>NSW Biodiversity Conservation Act 2016</i> (BC Act). A SBDAR was confirmed as the appropriate assessment pathway and was requested by CPHR during pre-lodgement consultation (refer to Section 5.4 of the MOD11 s4.55(2) Modification Report).
Around 2014 a boundary adjustment was approved without any public exhibition.	Not relevant to the MOD2 Application.

COMMENT/ISSUE RAISED	APPLICANT RESPONSE
The community were not notified for MOD's 1 – 9.	Not relevant to the MOD2 Application. MOD's 1-9 relate to the separate KEQ Major Project approval (MP09_0175). The original KEQ application was publicly exhibited by NSW Planning in accordance with the provisions of the EP&A Act. MODs 1, 2, 8 and 10 were also publicly exhibited by NSW Planning. MOD 9 was not formally exhibited; however, the application was presented to the CCC and was publicly available on NSW Planning's website and a number of public submissions were received and considered during assessment of the application.
The community has been robbed of an Independent Planning Commission (IPC) (formerly PAC) hearing for the proposed Karuah South Quarry.	Not relevant to the MOD2 Application. The proposed KSQ remains under assessment.
Environmental impacts of the Deep Creek Quarry approval.	Not relevant to the MOD2 application.
Traffic safety on Forest Glen Road associated with other quarry operations.	None of the quarry operations mentioned are affiliated with KHRQ or KEQ.
The proposed quarry at Maytoms Lane Booral should be refused due to ecology and waterway impacts.	
ARDG Stone Ridge Quarry will destroy Wallaroo State Forest from Italia Road and destroy creek systems.	
Eagleton Quarry will destroy bushland Italia Road to Six Mile Road and join the Boral Quarry. Boral / Seaham quarry is destroying bushland.	
Eagleton Quarry should be shut down.	Not relevant to the MOD2 application.
The NSW Planning Portal is difficult to navigate and designed to stop people from making objections. Mandating the use of the portal should not be allowed.	

Table 8: Response to Items of Support

COMMENT	RESPONSE
The Project	
Support for the project.	The Applicant welcomes this comment and agrees that the project can be supported. The Applicant considers that the project is strongly justified. The proposal will generate a range of beneficial outcomes including the extraction of a previously sterilised remnant dividing highwall between two established quarries and delivery to market to support the ongoing growth of the local & regional construction industry and key infrastructure projects. The proposal will result in significantly improved visual amenity (particularly when viewed from the Pacific Highway), improved operational and post closure geotechnical safety and will facilitate an improved final landform (with a free draining landscape) that is consistent with the surrounding landscape. The proposal will also ensure continued and uninterrupted employment for existing HQPL (and KEQPL) staff.
Procedural Matters	
No matters raised.	N/A
Economic, Environmental and Social Impacts	
<u>Amenity</u>	
A submission received by a local resident advised that HQPL have been operating in the location for more than twenty years and supports their continued operation subject to ongoing compliance with relevant conditions and guidelines.	The Applicant welcomes this comment, particularly noting that this comment was received from a local resident, located less than 5km from the subject site. HQPL have been operating the KHRQ since 2002 (and KEQPL have been operating the adjacent KEQ) since 2017. HQPL (and KEQPL) are highly confident that the proposed Karuah Pit Consolidation Project can be successfully delivered in accordance with the respective Development Consents for KHRQ and KEQ (as proposed to be amended), secondary approvals and management plans.
<u>Justification and Evaluation</u>	
Quarry and quarry products are essential.	The Applicant strongly agrees with this comment. The KHRQ and KEQ sites are known to contain a high-quality andesite resource. Material produced by the quarries include armour and gabion rock; concrete, drainage, and asphalt aggregates; manufactured sands, road bases and other fill products to support construction, infrastructure, and other development projects across Greater Newcastle, the Hunter Valley and Mid-North Coast regions. Materials from the quarries are supplied to a range of government agencies/organisations including Transport for NSW, a number of local Councils, the Port of Newcastle, Ausgrid, Newcastle Airport, Tier 1 infrastructure providers as well as the general construction, land development and infrastructure industries within Greater Newcastle, the Hunter Valley and Mid-North Coast regions.

COMMENT	RESPONSE
	The quarries also supply and support downstream businesses, including the Tea Gardens Hunter Readymix Concrete Plant, which in turn contributes to the local construction industry in the MidCoast LGA. In addition to the above, materials from KHRQ and KEQ are supplied to State Significant Infrastructure (SSI) projects including the Singleton Bypass, the Newcastle Inner City Bypass (SSI-6888), Pacific Highway widening at Hexham Straight, and the M1 Pacific Motorway Extension to Raymond Terrace (SSI-7319), which are critical to deliver improved connectivity of the Mid-North Coast (including the MidCoast LGA) to Sydney, Newcastle and the Hunter Valley. The proposal will allow continued supply of high quality quarry products to market. The overall Karuah Pit Consolidation Project (i.e. the modification of both of the KHRQ and KEQ consents) will secure the extraction of remaining in-situ resource of approximately 28.47 million tonnes (Mt) of material as measured from LiDAR contours captured in September 2024, inclusive of stockpiled overburden and currently approved resource that has not yet been extracted in accordance with the respective approvals, broken down as follows: • KHRQ – 5.25 Mt; and • KEQ – 23.22 Mt. The need for quarry products is acknowledged within the Hunter Regional Plan, which identifies that NSW needs a reliable supply of construction materials to support continued growth including sand and gravel, crushed rock, recycled materials and secondary aggregates created from construction, demolition and excavation. The need for hard rock quarry products is also acknowledged by the industry group Cement Concrete & Aggregates Australia (CCAA) who observe that demand for hard rock is outpacing current supplies.
Issues beyond the Scope of the Project	
No matters raised.	N/A

5.0 Updated Project Justification

5.1 Project Justification

A detailed project justification for the proposed development is provided within Chapter 7.0 of the Section 4.55(2) Modification Report and this remains unchanged and valid.

The Applicant has considered all submissions received (Government Agency and public).

Where requested, clarifying information has been provided to Government Agencies to allow assessment of the MOD2 application to progress to determination (refer to **Table 4**).

All matters raised within the public submissions have been addressed within **Table 7** and **Table 8** of this Submissions Report.

The s4.55(2) Modification Report and this Submissions Report have demonstrated that the MOD2 project can be undertaken satisfactorily with regard to all key environmental considerations.

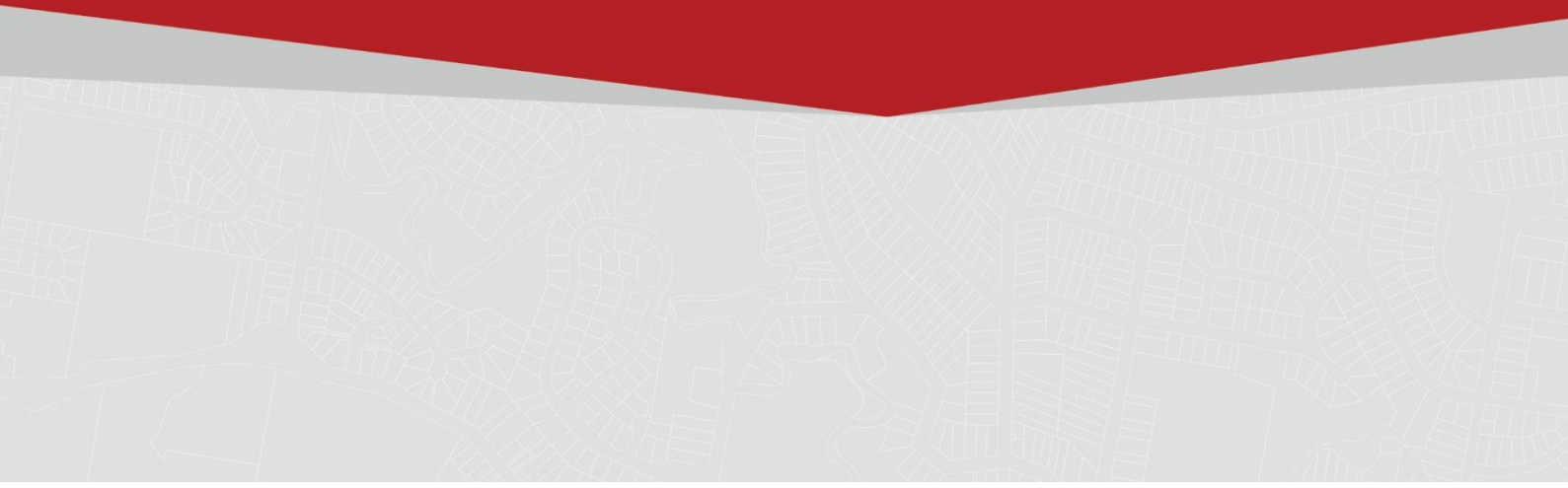
Following consideration of Government Agency and public submissions received, the Applicant remains confident that the proposed Karuah Pit Consolidation Project is strongly justified and can be supported. This is evidenced by the general level of support for the project (by both agency and public submissions as well as the Joint Karuah Quarry Complex CCC) and the lack of any objection from within the immediate local area.

6.0 Conclusion

This Submissions Report demonstrates that the proposed MOD2 development can be undertaken satisfactorily with regard to the matters raised by Government Agencies and the community in relation to the proposed development.

Overall, it is considered that the proposed MOD2 amendment to State Significant Development Consent 265-10-2004 to facilitate the Karuah Pit Consolidation Project is a suitable development that can be supported.

Appendix A



Appendix A

Submissions Register

Appendix B



Appendix B

Public Submissions Location Plan

Appendix C



Appendix C

Updated Summary of Mitigation Measures

Appendix D

Groundwater Advice

Appendix E

Traffic Advice

Appendix F

Acoustic Advice

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