

Submissions Report



for the

Bass Point Quarry Modification 3

PA 08_0143



Prepared by:

R.W. CORKERY & CO. PTY. LIMITED

May 2022

This page has intentionally been left blank

Bass Point Quarry

Submissions Report

Project Approval No. 08_0143

Modification 3

Prepared for:

Hanson Construction Materials Pty Ltd
ABN: 90 009 679 734
Level 18, 2-12 Macquarie Street
PARRAMATTA NSW 2150

Telephone: (02) 9354 2600
Fax: (02) 9354 2695
Email: andrew.driver@hanson.com.au

Prepared by:

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

Telephone: (02) 9985 8511
Email: admin@rwcorkery.com

Brooklyn Office:

Level 1, 12 Dangar Road
PO Box 239
BROOKLYN NSW 2083

Orange Office:

62 Hill Street
ORANGE NSW 2800

Brisbane Office:

Level 54, 111 Eagle Street
BRISBANE QLD 4000

Ref No. 706/06

May 2022



This Copyright is included for the protection of this document

COPYRIGHT

**© R.W. Corkery & Co. Pty Limited 2022
and**

© Hanson Construction Materials Pty Ltd 2022

All intellectual property and copyright reserved.

Apart from any fair dealing for the purpose of private study, research, criticism or review, as permitted under the Copyright Act, 1968, no part of this report may be reproduced, transmitted, stored in a retrieval system or adapted in any form or by any means (electronic, mechanical, photocopying, recording or otherwise) without written permission. Enquiries should be addressed to R.W. Corkery & Co. Pty Limited.



CONTENTS

	Page
EXECUTIVE SUMMARY.....	V
1. INTRODUCTION.....	9
1.1 SCOPE.....	9
1.2 DOCUMENT FORMAT	9
2. ANALYSIS OF SUBMISSIONS.....	10
3. ACTIONS SINCE EXHIBITION	11
3.1 CONSULTATION SINCE EXHIBITION	11
3.1.1 Community Consultation	11
3.1.2 Government Agency Consultation	11
3.2 DEFINITION OF MATERIALS TO BE IMPORTED	11
4. RESPONSE TO SUBMISSIONS	13
4.1 INTRODUCTION	13
4.2 CLARIFICATION OF THE PROPOSED MODIFICATION	13
4.3 VISUAL AMENITY	16
4.4 AIR QUALITY.....	16
4.5 NOISE	18
4.6 BIODIVERSITY	19
4.7 REHABILITATION	20
4.8 IMPORTATION OF MATERIALS.....	21
4.8.1 Classification of Imported Materials	21
4.8.2 Volume of Material to be Imported.....	22
4.8.3 Timing.....	23
4.8.4 Protocols	24
4.8.5 Testing and Certification	24
4.9 TRAFFIC AND TRANSPORTATION.....	25
4.10 COMMUNITY ENGAGEMENT	27
5. EVALUATION.....	28
5.1 INTRODUCTION	28
5.2 AMENDMENTS AND REFINEMENTS TO THE PROJECT.....	28
5.3 UPDATED CONTEXT FOR THE PROJECT	28
5.4 UPDATED JUSTIFICATION OF THE PROJECT	28
5.4.1 Social and Economic Considerations	28
5.4.2 Biophysical Considerations.....	29
5.5 THE CONSEQUENCES OF NOT PROCEEDING WITH THE PROJECT	29
5.6 CONCLUSION	29
6. REFERENCES.....	30



CONTENTS		Page
APPENDICES		
Appendix 1	Register of Submitters.....	31
 FIGURES		
Figure 1	Amenity Barrier Locations	15
 TABLES		
Table 1	Approved Transportation Limits	26

EXECUTIVE SUMMARY

Introduction

This *Submissions Report* presents the response from Hanson Construction Materials Pty Ltd (Hanson) to the submissions received by the Department of Planning and Environment (DPE) regarding the proposed modification to the development consent for the Bass Point Quarry (the Quarry) during and following the public exhibition period for the *Modification Report for the Bass Point Quarry – Modification 3* (the Proposed Modification).

Hanson is seeking approval to recognise the existing and proposed locations of amenity barriers within the Quarry in response to a Development Control Order served to Hanson by DPE on 4 February 2021. In addition, Hanson is seeking permission to clearly incorporate the importation of fill material for use in landscaping and progressive rehabilitation at the Quarry. The consent authority for the Proposed Modification is DPE.

During and following the formal exhibition period, submissions were provided to DPE from four Government agencies, one organisation and two individuals. Each of these submissions were registered on the DPE Major Projects website. Both individual public submissions received were in opposition to the Proposed Modification and were provided by members of the Community Consultative Committee (CCC) for the Quarry. The most commonly raised matters were clarifications around the importation and classification of material to be imported, followed by potential impacts to visual amenity and air quality upon the community in the vicinity of the Quarry.

Feedback provided by Frasers Property Australia that is currently developing the Shell Cove Marina noted that by restricting imported materials to Virgin Excavated Natural Materials (VENM) and Excavated Natural Materials (ENM), opportunities for beneficial use of material outside this classification would be foregone. As a result, Hanson consulted with the EPA, Council and DPE on requirements for other types of waste material to be accepted. As a result of this consultation and further discussions with Frasers Property Australia, Hanson is proposing to extend the definition of materials that may be imported to the Quarry to include:

- VENM imported to the site; and
- Materials permitted by an EPL, where an applicable Resource Recovery Order and Exemption, issued in accordance with Clauses 91 and 92 of the *Protection of the Environment Operations (Waste) Regulation 2014* (or its latest amendment), is in place and which allows the material to be received for application to land. This would include ENM as well as other relevant materials as specified by the EPA.

Any material that is imported would be permitted to be used as a fill material under the conditions of an applicable Resource Recovery Exemption and would be managed in accordance with the conditions specified in the applicable Resource Recovery Order. Current Resource Recovery Orders and Exemptions are available from the EPA website¹.

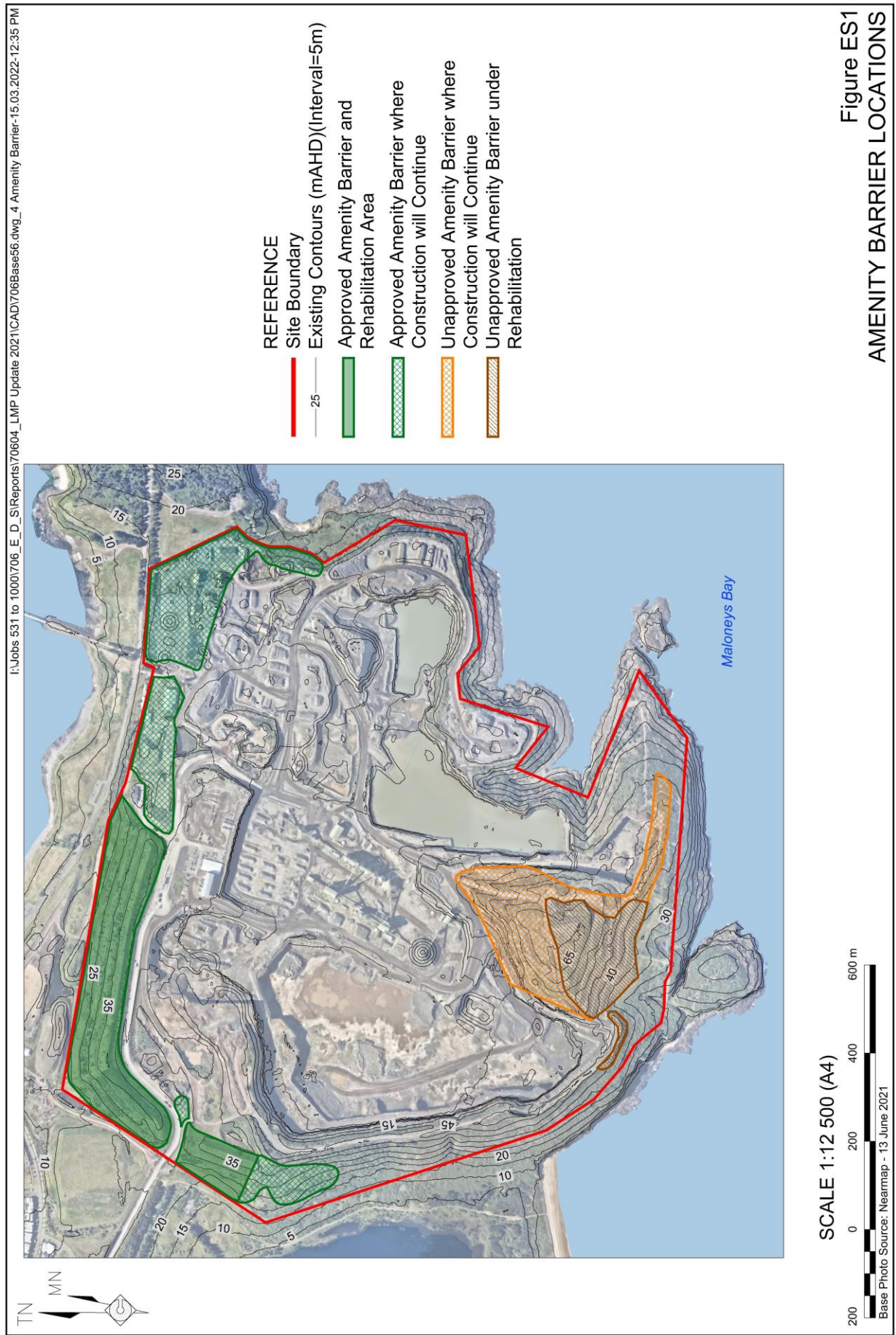
¹ <https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/resource-recovery-framework/current-orders-and-exemption>

In response to the matters raised in submissions Hanson has clarified the process and ongoing environmental management activities that would continue including the following.

- The locations and status of existing amenity barriers within the Quarry and those that would be the constructed and rehabilitated has been clarified. An updated version of Figure 4 from the *Modification Report* is presented as **Figure ES1** and clearly presents contour levels, a comparison of approved and unapproved amenity barriers, approved and unapproved rehabilitation areas and areas where construction is proposed to continue.
- The visual amenity benefit of barriers in the northeast of the Quarry Site has been clarified and discussed. It is reiterated that the barriers are not necessary to obscure approved Quarry operations, but would provide a visual amenity benefit for all views towards the Quarry.
- Dust that may be generated during the emplacement of materials would be minimised in accordance with the approved *Air Quality Management Plan* and ongoing environmental management and monitoring commitments would apply.
- Similarly, Hanson will continue to undertake Quarry operations in accordance with the approved *Noise and Blast Management Plan*. Any noise generated during the emplacement of materials would be minimised in accordance with the approved plan and ongoing environmental management and monitoring commitments would apply.
- The use of fill materials for rehabilitation of the Quarry Site would occur in accordance with the approval *Landscape Management Plan*. Existing performance and completion criteria would apply to these activities.
- The approved transportation limits for the Quarry are provided in Condition 8 of Schedule 2 of Project Approval (PA) 08_0143. It is noted that that there would be no exceedances of these approved movements as a result of importation of materials. The transport activities for the import of materials that use the public road network would be monitored using the weighbridge for the Quarry consistent with current practices.

Hanson has provided clarification of the protocols for the import of materials. This includes the following details raised in community submissions.

- A conservative estimate has been made that 900 000t of material would be required to construct the remaining amenity barriers.
- Material would be imported on a campaign basis as the materials are generated. Therefore, it not possible to explicitly specify timing for the process. A limit of 200 000tpa has been proposed to give certainty to the community.
- Based on this estimate, no more than 5 714 additional vehicle movements would be generated based on an average heavy vehicle carrying capacity of 35t. It is noted the Quarry is approved for no more than 500 heavy vehicle movements within 24 hours, and that there would be no exceedances of these approved movements as a result of importation of materials.



- Given the nature of the sources of imported materials and irregularity of importation campaigns it is not possible to define a transport route beyond that contained in PA 08_0143 which specifies a route as far as Shellharbour Road for material importation as requested in the submissions.
- It is reiterated that transportation of fill materials would continue to be the responsibility of the operator depositing the material and subject to approval for that operation including traffic generation.
- Opportunities for imported material to be backfilled in a quarry vehicle would be prioritised in order to reduce total traffic generation.

The proposed modification would not result in any additional environmental impacts that are not consistent with those currently approved under PA 08_0143. While there would be campaigns of material import and emplacement, the environmental impact of these campaigns are expected to remain consistent with those currently approved. It is noted that retaining the constructed amenity barriers would result in an overall increase in visual amenity given that they would obscure possible views of the approved operations within the Quarry Site.

Environmental management at the Quarry would continue in accordance with the approved management plans and internal Hanson procedures. This *Submissions Report* demonstrates that potential impacts associated with visual amenity, operational noise and dust and traffic changes would continue to be acceptable and generally consistent with the existing approved operation.

On balance, the proposed modification would be in the public interest as it would enable the ongoing beneficial use of the material generated by development elsewhere and would improve the visual amenity for neighbours to the Quarry.

1. INTRODUCTION

1.1 SCOPE

This document has been compiled to provide a response to the key matters raised in public and government agency submissions lodged with the Department of Planning and Environment (DPE) during and following the public exhibition period for the *Modification Report for the Bass Point Quarry – Modification 3* (the proposed modification). Hanson Construction Materials Pty Ltd (Hanson) is seeking approval to recognise the existing and proposed locations of amenity barriers within the Quarry in response to a Development Control Order served to Hanson by DPE on 4 February 2021. In addition, Hanson is seeking permission to clearly incorporate the importation of fill material for use in landscaping and progressive rehabilitation at the Quarry. The Modification Report was publicly exhibited between 15 December 2021 and 19 January 2022. Three public and organisation submissions were received in response to the proposed modification and feedback has been provided by four government agencies including Shellharbour City Council (Council).

This document provides an analysis of the submissions received relating to the proposed modification, a summary of actions taken since the public exhibition of the *Modification Report* and a review of the matters raised. The document concludes with an updated evaluation of the Project's merits that reflect all additional matters addressed in this document.

1.2 DOCUMENT FORMAT

This report has been compiled in six sections as follows.

- Section 1: introduces the report.
- Section 2: provides an analysis of the submissions received from Government agencies, organisations and individuals in the community.
- Section 3: provides a summary of the actions taken since exhibition, including consultation that has been undertaken as a result of the content of some of the submissions.
- Section 4: provides a comprehensive set of responses to the matters raised by organisations/individuals and Government agencies.
- Section 5: provides an updated evaluation of the proposed modification taking into consideration the matters raised in submissions.
- Section 6: provides details of documents referenced in the Submissions Report.

A Register of Submitters is provided as **Appendix 1**, which presents the details of public and organisation submissions and the matters raised in them.

2. ANALYSIS OF SUBMISSIONS

Appendix 1 presents a Register of Submitters including a review of the matters raised and where each has been addressed in this document.

A total of three public submissions were received by DPE following public exhibition of the *Modification Report* for the Project. The public submissions may be separated into the following categories.

- Opposing public submissions – two individual submissions from members of the general public opposing the proposed modification.
- Organisation submission – one submission from an organisation providing feedback on the proposed modification.

Over the same period, four Government agencies provided feedback following review of the *Modification Report*. It is noted that the government agency submissions addressed the proposed modification generally regarding the matters relevant to the administrative functions of each agency.

Opposing individual public submissions received were provided by residents of Shell Cove and Minnamurra, located approximately 1.5km west and 2.5km south of the Project respectively. Both submissions were received from current members of the Community Consultative Committee (CCC) for the Project. All members of the CCC were consulted regarding the proposed modification in CCC meetings on 30 March 2021 and 2 March 2022 with updates on the modification provided on 20 July 2021, 28 September 2021 and 14 December 2021. This reflects the local nature of potential impacts associated with the proposed further development of existing visual amenity barriers and incorporation of imported fill materials for use in landscaping and progressive rehabilitation.

The most commonly raised matters were clarifications around the importation and classification of material to be imported, followed by potential impacts to visual amenity and air quality upon the community in the vicinity of the Quarry.

3. ACTIONS SINCE EXHIBITION

3.1 CONSULTATION SINCE EXHIBITION

3.1.1 Community Consultation

Hanson supports a Community Consultative Committee (CCC) in accordance with Condition 6 of Schedule 5 of PA 08_0143. An update on the proposed modification application was presented to the CCC at an extraordinary meeting on 2 March 2022. At that meeting the issues raised by the community in public submissions were reiterated and discussed. A presentation summarising some of the key responses to these submissions and general clarifications regarding the proposed modification was also provided during this CCC meeting.

3.1.2 Government Agency Consultation

Consultation was undertaken with the NSW Environment Protection Authority (EPA) regarding the permissibility and management requirements relating to the importation of materials under a Resource Recovery Order for use in landform construction and rehabilitation. The EPA advised that this would require lodgement of a variation to EPL 2193 and implementation of required monitoring and reporting measures consistent with the Resource Recovery Order.

Consultation with Shellharbour City Council (Council) was undertaken in a virtual meeting on 10 March 2022. The discussion focused on the need to more clearly present areas of approved and proposed amenity barrier construction and the importation of material under a Resource Recovery Order. Council indicated that the import of material was supported as long as it was done in accordance with EPA requirements and was appropriately managed when applied to land.

Consultation with officers at DPE also included discussion of the proposed import of materials for use in landform construction and rehabilitation.

These matters have been considered in response to the request from Frasers Property Australia that is discussed in Section 4.8.

3.2 DEFINITION OF MATERIALS TO BE IMPORTED

Feedback provided by Frasers Property Australia that is currently developing the Shell Cove Marina noted that by restricting imported materials to Virgin Excavated Natural Materials (VENM) and Excavated Natural Materials (ENM), opportunities for beneficial use of material outside this classification would be foregone. As a result, Hanson consulted with the EPA, Council and DPE on requirements for other waste material to be accepted (as noted in Section 3.1.2). As a result of this consultation and further discussions with Frasers Property Australia, Hanson is proposing to extend the definition of materials that may be imported to the Quarry to include:

- VENM imported to the site; and
- Materials permitted by an EPL, where an applicable Resource Recovery Order and Exemption, issued in accordance with Clauses 91 and 92 of the *Protection of the Environment Operations (Waste) Regulation 2014* (or its latest amendment), is in place and which allows the material to be received for application to land. This would include ENM as well as other relevant materials as specified by the EPA.

Any material that is imported would be permitted to be used as a fill material under the conditions of an applicable Resource Recovery Exemption and would be managed in accordance with the conditions specified in the applicable Resource Recovery Order. Current Resource Recovery Orders and Exemptions are available from the EPA website².

Any material imported to the Quarry would be used for application to land either through construction of amenity barriers or rehabilitation. This is consistent with the existing approval that permits the import of material for these uses. Therefore, the import and use of this material would be consistent with the already approved activities and therefore substantially the same as the activities originally approved under PA 08_0143. In addition, the approach would be consistent with the current modification application and therefore does not constitute an amendment to the application as it has been presented to the community and DPE.

Furthermore, where imported material meets the relevant beneficial use requirements under a relevant Resource Recovery Order, there is no change to the approved use for the purposes of project approval. Handling and management of the material would occur in accordance with the EPA's requirements for the use of the materials as specified in the relevant guidance.

Suggested wording for a condition of consent for this process is as follows.

Any material imported to the site is to be Virgin Excavated Natural Material or material subject to a Resource Recovery Order that is permitted to be used as a fill material under the conditions of the associated Resource Recovery Exemption, in accordance with the Protection of the Environment (Waste) Regulation 2014.

² <https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/resource-recovery-framework/current-orders-and-exemption>

4. RESPONSE TO SUBMISSIONS

4.1 INTRODUCTION

This section provides a response to all submissions received following the exhibition of the *Modification Report*. In order to limit repetition and allow the matters raised in the submissions to be adequately and efficiently addressed, each submission was reviewed, and the matters raised were categorised. **Appendix 1** provides a Register of Submitters and summary of the matters raised in each submission.

The following subsections provide representative comments from a range of submissions for each issue raised and a consolidated response to that issue. The representative comment(s) have been chosen to highlight the matter identified and it is noted that these may not be the only feedback received in submissions that comment on a specific matter.

4.2 CLARIFICATION OF THE PROPOSED MODIFICATION

Representative Comment(s)

To enable Council to undertake a thorough review of the modification and provide comments as requested, additional information and amended plans are required as per the below:

- *Amended plans which clearly show the existing and proposed contour levels across the areas the subject of this modification (note that the submitted plans are not provided at a resolution which allows for the reading of the contour lines).*
- *Amended plans which clearly identify what amenity barriers exist on the site currently, what additional amenity barriers (or additional height to be added to existing barriers) are proposed to be constructed at the site and what parts, if any, of the existing amenity barriers have current development consent.*
- *Additional information which clarifies whether the screen mounds noted on the 'Approved Quarry Layout Plan' as being 30m AHD and 40m AHD along the northern boundary of the quarry are existing and have been constructed to the approved heights.*
- *Amended plans which clearly identify what rehabilitation areas have development consent and which are proposed as part of the modification request.*
- *Clarification on the use of VENM/ENM materials. Parts of the information indicate that the VENM/ENM is to be used for landscaping and rehabilitation and others indicate it is to be used in the construction of the visual amenity barriers.*

Shellharbour City Council

My objection to the proposed amendment Mod 3 is based on concerns that the scope of the project does not clearly explain how the proposed amendment relates to the remediation work subject to Development Control Order served to Hanson by the Department of Planning, Industry and Environment and dated 4 February 2021...

...The visual amenities to be modified or constructed are not clearly detailed in the modification proposal. I am requesting the approval document to be revised to include a diagram that clearly shows existing visual amenities vs the proposed visual amenities, the diagram needs to allow the general public to understand the locations where the visual amenities will be constructed or modified.

...In my opinion the benefits of the control order are not clearly understood and the largest impact of not enforcing the control order would be the management of the stockpiled material from land which is owned by Shellharbour council.

Leslie Brooks of Shell Cove, NSW

Very little content refers to the primary reason for this Modification - the approval of the unlicensed material on the southern headland/mound of Bass Point. The report instead relates to 200,000 tonnes p/a of imported material for new 'Amenity Barriers' construction.

...The disturbing statement in 5.2.3 Consequences of Not Proceeding with the Proposed Modification - should the proposed modification not proceedis unfortunate and concerning.

Vicki Steele of Minnamurra, NSW

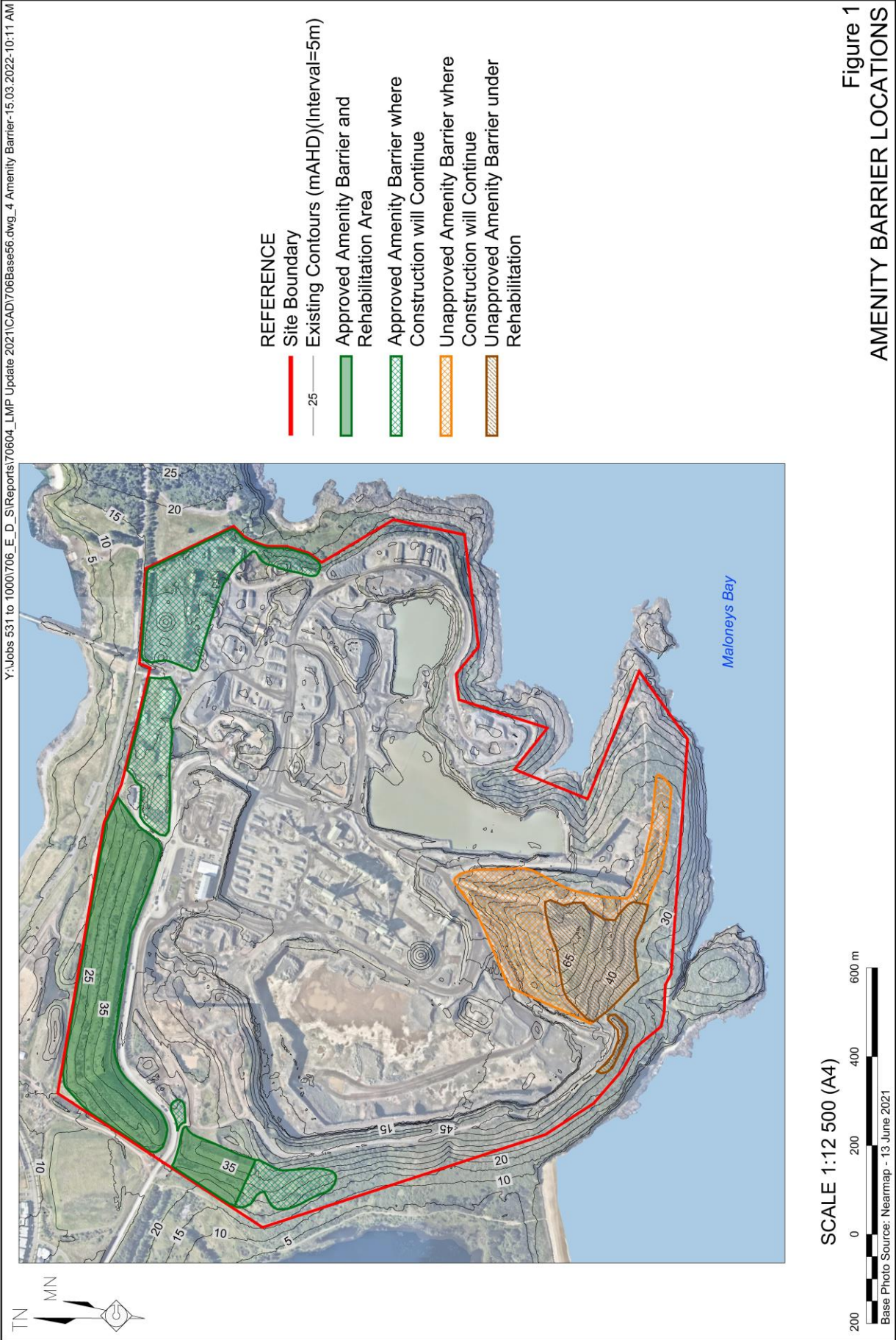
Response

An updated version of Figure 4 from the *Modification Report* clearly presenting contour levels, a comparison of approved and unapproved amenity barriers, approved and unapproved rehabilitation areas and areas where construction is proposed to continue is presented as **Figure 1**.

Section 2.2 of the *Modification Report* defines the proposed modifications to the locations and scales of the amenity barriers within the approved Quarry Site to consist of the following.

- Further extension and development of the approved and existing visual amenity barriers to the north-west of the Quarry Site, to a potential maximum extent of that shown on Figure 3 of the *Modification Report*.
- Increasing the extent of the approved visual amenity barrier locations to the north-east of the Quarry Site, to a potential maximum extent of that shown in Figure 3 of the *Modification Report*, and an increase in the approved maximum height from 30m AHD to 40m AHD, where practicable, to allow for a more consistent landform when compared to the existing areas to the north-west.
- Further development of the area in the vicinity of the existing southern visual amenity barrier to a potential maximum extent of that shown on Figure 3 of the *Modification Report*, to allow for increased visual impact mitigation during the latter stages of extraction in the southern areas of the approved extraction area. No change in the current height of the existing modified landform is proposed. The barriers on the southern section of the Quarry Site are not currently approved under PA 08_0143 and consist of land completed and under rehabilitation as well as locations for future material placement and barrier construction.

It is proposed that imported material would be used for amenity barrier construction as shown in **Figure 1**. Following completion of the amenity barriers, these areas will be rehabilitated in accordance with the approved *Landscape Management Plan*. This notwithstanding, imported materials may be used for both amenity barrier construction and rehabilitation generally within the Quarry Site.



As noted in Section 1.4 of the *Modification Report*, construction of amenity barriers has occurred under the existing approved operations; however, it was identified that the emplacement of materials in the southern section of the Quarry is not considered consistent with plans presented in the original EA (InSite, 2011) for the Project and therefore is not compliant with Condition 2 of Schedule 2 of PA 08_0143. This condition requires that the Quarry be operated in accordance with the EA amongst other documents. The proposed modifications have been proposed to rectify this non-compliance which was the subject of the Development Control Order served to Hanson by DPE and dated 4 February 2021.

Hanson notes that the submitter finds the information presented in Section 5.2.3 of the *Modification Report* disturbing and agrees that it is preferable for the constructed amenity barriers to remain in place to retain established vegetation and avoid the need to extract material. The fact that the consequences of not proceeding with the proposed modification would be overwhelmingly negative provides justification that the proposed modifications should proceed.

4.3 VISUAL AMENITY

Apart from possible impact to the views from the south and the remediation of the visual amenity the visual impacts on the north eastern boundary would have little benefits for the community.

Leslie Brooks of Shell Cove, NSW

Response

As identified in Section 8.7.4 of the EA for the Bass Point Extension Project (InSite, 2011), the existing processing plant and equipment is located in the northern section of the Quarry in an area which has been determined to be visually prominent. Additionally, stockpiles are located nearby to ensure the operational efficiency of activities undertaken within the processing area. The EA notes that these areas of the Quarry can clearly be seen and identified when viewing the Quarry Site from the north. It is agreed that construction of amenity barriers in this area as shown in **Figure 1** is unlikely to benefit the community to the west and south of the Quarry. Development of the northern barriers would improve the visual amenity of the Quarry when viewed from the north, particularly from areas such as Barrack Point and Windang Island. This notwithstanding, it is considered that construction and vegetation of the proposed amenity barriers would improve views towards the Quarry, except during short-term construction and vegetation establishment periods.

4.4 AIR QUALITY

Representative Comment(s)

...The EPA has received dust complaints from the community relating to the quarry during normal operations. Hanson is aware of these complaints.

The creation of new amenity barriers has the potential to create additional dust issues during the unloading and landscaping of imported material. Hanson need to ensure all imported material is managed in a way that minimises dust emissions during amenity barrier construction, including but not limited to, dust suppression techniques and limiting construction works to appropriate weather conditions.

NSW Environment Protection Authority (EPA)

...The visual amenity barriers are for most practical purposes are completed and throughout the construction process to date there was a significant dust impact. Since 2018 to present 17% of complaints recorded in Hanson Bass Point Complaint Register were related to dust complaints.

...Historically while the Marina has been under construction the cause of dust impacting the nearby community of Shell Cove has been difficult to isolate as dust has been generated by both quarry activities and by Marina construction activities. With the majority of Marina work completed the modification on the quarry site should hold Hanson responsible for any dust complaints, otherwise it will be impractical to hold either Hanson nor Frasers as the responsible agents for dust control.

Leslie Brooks of Shell Cove, NSW

...In this submission I am objecting to the proposed amendment on the basis that the importing of VENM/ENM will create an unwanted dust impact and the construction of the visual amenities will have a minimal benefit to blocking off quarry activities for the wider community.

*...The summary suggests “the proposed modification would not result in any additional environmental impacts that are not consistent with those currently approved under PA 08 0413 or that would be discernible by the community” so does that mean Hanson’s website documented *dust complaints (see below) between October 2014 to November 2021 will continue. (dust pollution from wind exposure of the 200,000 tonnes (VENM) and (ENM) p/a in constructing the proposed Amenity Barriers. *NB: Of the 79 complaints in the Hanson Complaints register from Sept 2014- Nov 2021 29 relate to blasting activities and ground vibration and 18 for dust related incidents.*

Vicki Steele of Minnamurra, NSW

Response

As identified in Section 4.3 of the *Modification Report*, the existing environmental setting as it relates to air quality is influenced by regular operational activities approved under PA 08_0143. The operation of the Quarry includes dust emission sources such as the crushing and screening plant, trucks driving on unsealed roads and dust lift off from stockpiles. The Air Quality Assessment for the Bass Point Quarry Extension Project (Heggies, 2010) predicted that emissions of TSP, PM₁₀, PM_{2.5} and dust deposition directly attributable to the Quarry would be unlikely to result in adverse cumulative impacts. Furthermore, it is considered unlikely that air quality impacts would be noticeable or significantly higher at surrounding residences as a result of the proposed modification.

Despite the above, as noted in the submission, identifying the emission source of dust impacting the local community can be considered challenging due to the number of potential sources present in the local setting. The *Modification Report* states that a range of non-Project related dust sources exist within the vicinity of the Quarry, including:

- Construction activities at the Shell Cove Harbour Precinct.
- Construction activities at the Shell Heights residential development.
- Dust from surrounding quarrying operations including quarries at Bombo, Albion Park, Dunmore as well as the waste facility at Minnamurra.

Although construction activities within the Shell Cove Harbour Precinct are nearing completion, the remainder of the non-Project related sources identified above are expected to continue operations into the foreseeable future, and therefore, so are potential cumulative air quality

impacts. As a result, it is unreasonable that Hanson be considered responsible for all dust in the locality as suggested in the submission. However, Hanson will investigate all complains and continue to seek opportunities for improvement of air quality outcomes where these arise. These may include new technologies, operational improvements or other measures identified during operations.

Air quality impacts would continue to be managed in accordance with the *Air Quality Management Plan* for the Quarry. It is noted that should approval for the proposed modifications be granted, the *Air Quality Management Plan* will be reviewed and updated to reflect any operational changes that may come about as a result of the proposed modification. It is considered that the existing program of dust monitoring would remain a suitable measure to detect any exceedances of the approved air quality criteria, and to guide remedial actions in the event that any exceedances are detected. Should an exceedance of the approved air quality criteria be identified upon review of monitoring results at the Quarry, Hanson will undertake remedial actions as necessary, however mitigation and management of air quality impacts not directly attributable to Quarry operations are the responsibility of the non-Project related sources from where they may originate.

It is noted that Hanson currently undertakes air quality management and mitigation measures as detailed in Table 8 of the approved *Air Quality Management Plan*, which is publicly available on the Hanson website³.

4.5 NOISE

Representative Comment(s)

The importation of material has the potential to increase truck and machinery movements at the site which may increase the noise generated by the premises. Hanson need to be aware of this risk and only conduct works during approved hours of operation and during appropriate weather conditions.

NSW Environment Protection Authority

Response

As identified in Section 4.4 of the *Modification Report*, the potential short-term noise generation for the proposed activities would occur against a backdrop of significantly higher levels from previously assessed and approved activities, both within the Quarry Site and from ongoing development and transport activities in the areas surrounding the Quarry Site. Equipment with a similar or lower sound power generation would be used on a campaign basis. It is therefore considered unlikely that these activities would be discernible from existing Quarry operations.

Notwithstanding, Hanson will continue to undertake Quarry operations in accordance with the approved *Noise and Blast Management Plan*. Noise mitigation and management measures are identified in Sections 3.2 to 3.4 of the approved *Noise and Blast Management Plan*. It is noted that these measures include the following.

- Where practicable, schedule the use of any noisy equipment to the daytime only.

³ https://www.hanson.com.au/media/7676/aqmp_72_final.pdf

- During extreme weather conditions i.e. strong winds, the Quarry Manager will relocate and operate major noise emitting mobile plant items away from areas where any adverse prevailing wind conditions would normally enhance noise emissions in the nearby residential areas in order to reduce noise levels, where reasonable and feasible.

While not explicitly stated in the *Noise and Blast Management Plan*, Hanson has and will continue to restrict all Quarry operations to the approved hours of operation.

4.6 BIODIVERSITY

Representative Comment(s)

We have reviewed the Modification Report and note that the Report states there would not be any changes to biodiversity matters as a result of the modification. However, we request Planning and Assessment Group (PAG) clarify the process for complying with Clause 30A(2) of the Biodiversity Conservation (Savings and Transitional) Regulation 2017, which states:

- (b) a biodiversity development assessment report is required to be submitted and taken into consideration if Division 4 of Part 7 of the new Act would have applied to the original development (as proposed to be modified) if planning approval had been granted after the commencement of the new Act, and*
- (c) however a biodiversity development assessment report is not required to be submitted if the authority or person determining the application for modification (or determining the environmental assessment requirements for the application) is satisfied that the modification will not increase the impact on biodiversity values.*

Regarding the Landscape Management Plan (LMP) provided as Appendix 1 of the Modification Report, we advise that we have no specific comments on the Plan. We note the original approval did not require consultation with the Department of Planning, Industry and Environment – Biodiversity and Conservation Division (DPIE – BCD) or predecessor departments. However, Shellharbour City Council provided detailed biodiversity comments as part of an earlier consultation process. Please ensure that DPIE – BCD is not given a post-approval role as stated in the updated material.

Biodiversity & Conservation Division, Environment, Energy and Science

Response

Clarification for the process for complying with Clause 30A(2) of the *Biodiversity Conservation (Savings and Transitional) Regulation 2017* is a matter for DPE as noted in the BCS submission. Regardless, it is reiterated that it is considered that the proposed modification would not result in additional biodiversity-related impacts and would not disturb any new areas not already approved or historically disturbed.

Hanson notes BCS' request to not be given a post-approval role regarding updates to the *Landscape Management Plan* for the Quarry and will engage in no further consultation with BCS on this matter at their request. In the event that consultation with BCS is necessary during preparation of the updated *Landscape Management Plan*, Hanson will do so through the appropriate channels.

4.7 REHABILITATION

Representative Comment(s)

...When Hanson acknowledged this material was outside the development's approval the area was quickly graded, a stabilising seed medium applied and Jamberoo Native Nursery undertook the extensive planting of tube stock. A quick cover up that sadly neglected to provide the follow on care program of watering /weeding and replacement of dead plants.

...An accurate, current rehabilitation report of southern headland native vegetation after two years of regeneration.

...Steve Butcher, Manager, and Chelsea Flood (Compliance Officer) arranged a special meeting on 6th January for further discussion and a site visit. The site visit was disappointing, reparation of the southern headland is neglected, terrible weed infestation and no evidence of trees in the plastic tree guards. There has been little attempt to repatriate this damaged headland environment.

...Considering the major development to Shellcove and Bass Point in recent years this (southern headland) is necessary as an important wildlife corridor between Bass Point and the Killalea Reserve... This area is protected under the Coastal Management Act 2016 and the Act should be carefully considered with any future Modifications.

...Hopefully, Hanson/Frasers as responsible corporate citizens will commit to repair the environmental damage to the southern headland of Bass Point (subject to approval of the material) and replant/manage the area for 5-10 years to restore the wildlife corridor between the Bass Point and Killalea State Park.

Vicki Steele of Minnamurra, NSW

Response

The performance criteria for landscape management, progressive rehabilitation and final landform rehabilitation are provided in Tables 7 and 8 of the approved *Landscape Management Plan* for the Quarry. Each of these tables also identifies the nature and frequency of monitoring to be undertaken during normal operations of the Quarry and following Quarry closure.

During normal operations, landscape management measures are managed through a quarterly visual inspection by the Quarry Manager. The *Landscape Management Plan* provides the check list that would be used during these inspections and includes detailed instructions on any remedial actions considered necessary.

Four photo point monitoring locations were established at the Quarry on 15 December 2017 at the following locations.

- North of the Quarry Site boundary and the northern visual amenity bund (PP1).
- Directly adjacent to the western pit (PP2).
- Within the Endangered Ecological Community Littoral Thicket located in the east-south-eastern part of the Quarry (PP3).
- In the vicinity of the southern visual amenity barrier (PP4).

Annual monitoring including photography and a description of vegetation condition is undertaken at these locations, with results included in each Annual Review. Hanson has committed to maintenance of the final landform for a period of 10 years post-closure, or until such time as all completion criteria have been satisfied.

Considering the above, Hanson notes that an accurate, current rehabilitation report of the southern native vegetation headland after two years of regeneration will be included in the relevant Annual Review.

As noted in the *Landscape Management Plan*, tree guards will be used to protect tubestock if risks from herbivores are present. Weed control activities have been undertaken on the southern headland to fulfil biosecurity obligations and to promote the success of native tubestock plantings.

Hanson contends that any statutory requirements of the *Coastal Management Act 2016* will be considered during the planning of any future modifications to PA 08_0143 which may impact the southern headland.

4.8 IMPORTATION OF MATERIALS

4.8.1 Classification of Imported Materials

The restriction of incorporating the importation of only Virgin Excavated Natural Material (VENM) and/or Excavated Natural Material (ENM) for use in landscaping and progressive rehabilitation at the Quarry may place unnecessary restrictions on material well suited for the proposed use, however does not meet the explicit criterion of the VENM and/or ENM resource recovery order and exemption.

Australand considers that the Modification Report and subsequent modified Consent could be suitably addressed through the inclusion of wording such as 'or other material approved by the EPA' where reference is made to VENM and/or ENM. This terminology is common within Consents approved by Shellharbour City Council (and other Councils) where applicable to the attributes of the site.

Australand Corporation (NSW) Pty Ltd – Frasers Property Australia Pty Limited

Response

As noted in Section 3.2, consultation with Government agencies regarding this matter identified the following.

1. Importing material other than VENM or ENM would be consistent with other similar approved operations, and ongoing waste management within the Quarry Site would need to address the EPA's waste tracking and reporting requirements under the *Protection of the Environment Operations Act 1997*. This includes payment of a waste levy (when applicable) and satisfaction of the EPA's waste classification requirements under the *Waste Classification Guidelines 2014* and any relevant resource recovery order and exemption.

2. Council support the appropriate handling and storage of waste at the Quarry Site. Material other than VENM/ENM that may be stored at the Quarry Site should be handled appropriately.

Hanson is proposing that importation of material be permitted as follows.

- VENM imported to the site.
- Materials permitted by an EPL, where an applicable Resource Recovery Order and Exemption, issued in accordance with Clauses 91 and 92 of the *Protection of the Environment Operations (Waste) Regulation 2014* (or its latest amendment), is in place and which allows the material to be received for application to land.

This matter is discussed in detail in Section 3.2. However in summary, it is considered that the proposed approach remains consistent with the current approval, the proposed modification as presented in the Modification Report and the proposed use of material as fill for barrier construction and rehabilitation activities.

4.8.2 Volume of Material to be Imported

Representative Comment(s)

...the additional volume of material which is required to be brought to the site to provide for the additional works is to be provided. Information which provides details as to where this material is likely to be sourced and how that material is to be transported to the site is to be provided.

NSW Environment Protection Authority

...There is a discrepancy in the amount of material that was originally deposited. Hanson states 250,000 tonnes while a Frasers spokesperson told Illawarra Mercury 23/11/2019 that the mound was 300,000 tonnes and further 150,000 tonnes was to be deposited.

...For the purpose of the development consent, Hanson propose that no more than 200,000tpa of VENM or ENM material would be imported each calendar year. My first concern on this matter is that the volume of VENM/ENM that is required to construct the required visual amenities has not been identified. Section 2.3.1 Importation Campaigns and Limits of the modification proposal should include an engineering estimate the volume of VENM/ENM required to meet the requirements of the control order.

Leslie Brooks of Shell Cove, NSW

Response

The agreement between Council (through Frasers Property Australia) and Hanson relating to placement of materials requires that Council be responsible for ensuring that the nature and volume of material placed on the Quarry Site is acceptable. Hanson reaffirms that the most amount of imported material received in a calendar year was 250 000t in 2019 (Section 2.3.1 of MOD3 report), with an estimation of 126 000t - 150 000t placed during the campaign at the southern barrier. Hanson cannot comment on the information provided to the Illawarra Mercury except to note that the amounts discussed in the submission relate to all materials imported and that the discrepancy between the quoted amounts of 250 000t and 300 000t may relate to the assumed density of the materials (expressed as tonnes per cubic metre).

A conservative estimate has been made that 900 000t of material would be required to construct the remaining approved and proposed amenity barriers. To be clear, the amenity barriers would be constructed as the material is available and is not a necessary aspect of Quarry development. That is, there has been no commitment relating to the timing of this construction work. In addition, material may also be imported for rehabilitation works such as revegetation on terminal benches.

Based on the maximum volume estimates of 900 000t required for completion of the approved and proposed amenity barriers, and the proposed maximum limit of no more than 200 000tpa of material imported to the Quarry, it is conservatively estimated that no more than 5 714 additional vehicle movements would be generated based on an average heavy vehicle carrying capacity of 35t. It is noted the Quarry is approved for no more than 500 heavy vehicle movements within 24 hours, and that there would be no exceedances of these approved movements as a result of importation of materials. This would be ensured through continued use and expansion of the monitoring measures detailed in Section 4.9.

Section 2.2 of the *Modification Report* notes that the proposed modifications represent the potential maximum extent of the barriers, meaning that barriers may not be developed in all locations or to the elevations described. This is a function of the fact that material imported to the Quarry occurs on an irregular campaign basis and is wholly dependent on the generation of materials at nearby developments. The most recent campaigns have been the result of earthworks associated with the Shell Cove Marina development which are now largely complete. Therefore, it is not possible to accurately predict the timing, scale, or volume of material importation on a monthly or annual basis.

4.8.3 Timing

Representative Comment(s)

The project should provide an estimate of VENM.ENM volume that will allow the control order to be finalised and based on historical records it should be possible to estimate and include a targeted termination date such that the import of 200,000tpa will be within a defined time frame.

...I am requesting that the EPA ensure that a timeline for the project to be determined with possible allowances for issues out of control (ie: Covid health order closures). The benefits of a controlled and reduced timeline will be dust generated from the project will have a reduced impact, rather than generating dust over a longer and protracted timeline.

Leslie Brooks of Shell Cove, NSW

Response

The request for determination by the EPA of a timeline for visual amenity barrier construction which accounts for unforeseen issues such as closures due to government health orders is a matter for the EPA. However, Hanson continues to commit to undertake all activities at the Quarry in a manner such that unnecessary environmental impacts, including particulate matter emissions, are minimised and remain consistent with those currently approved under PA 08_0143.

4.8.4 Protocols

Representative Comment(s)

The approved document should show the proposed transport / haul route to be used for the relocation of the stockpiled VENM/ENM.

Leslie Brooks of Shell Cove, NSW

Response

As identified in Section 2.3.2 of the *Modification Report*, transportation of imported materials would continue to be the responsibility of the operator depositing the material and subject to approval for that operation including traffic generation. Material that is imported from neighbouring properties would continue to be treated in a similar manner to load and haul operations within the Quarry as there would be no use of the public road network. Other vehicles may enter the Quarry from the public road network when importing materials to the Quarry, however, opportunities may arise for material to be backfilled in a quarry vehicle. This approach would be prioritised.

Given the nature of the sources of imported materials and irregularity of importation campaigns, Hanson contends that it is effectively impossible to define a transport route beyond that contained in PA 08_0143 which specifies a route as far as Shellharbour Road for material importation as requested in the submission.

4.8.5 Testing and Certification

Representative Comment(s)

The EPA takes this opportunity to remind Hanson of their requirement to comply with the Protection of the Environment Operations Act 1997 (POEO Act) when importing material to site. Clause 39 of Schedule 1 of the POEO Act describes the scheduled activity for Waste disposal (application to land).

The Modification Report states that the importation of VENM and ENM may be exempt from requiring an Environment Protection Licence due to Clause 39 of Schedule 1 of the POEO Act and The excavated natural material exemption 2014.

These exemptions require the imported material to meet certain specifications. The EPA reiterates that it is Hanson's responsibility to determine if imported material meets specification and any other requirement of those exemptions to ensure they are not in breach of the POEO Act when importing material to site.

NSW Environment Protection Authority

...Was this soil comprehensively tested and approved by government authorities? (Reference to the original toxic swamp where the marina material was excavated)

Was certification of the material provided by Hanson/Fraser to EPA?

Vicki Steele of Minnamurra, NSW

Response

Hanson notes its obligations under the *Protection of the Environment Operations Act 1997* (POEO Act) when importing materials into the Quarry Site. The classification of materials is discussed in Section 4.8.1.

As identified in Section 2.3.3 of the *Modification Report*, Hanson notes that the supplier (generator) of the materials imported to the Quarry would continue to be responsible for providing the necessary materials classification certificates and any other documentation required under the legislative requirements for materials classification and supply. This includes the necessary certificates for classifying material as VENM and similar documentation for other materials as well as the outcomes of materials sampling and analysis required to classify material. The sampling regimes for ENM are presented in *The excavated natural material order 2014*.

In the event that the supplier of imported materials is unable to provide the relevant certifications required under the legislative requirements for materials classification and supply, no materials will be accepted from that supplier by Hanson until such time as the necessary certifications and documents are provided.

It is noted that Environmental Protection Licence (EPL) 12426 for the Shell Cove Marina Development permitted the importation and emplacement of material within the Quarry Site at the time the works were undertaken. These materials were imported and emplaced in accordance with EPL 12426 and in consultation with the EPA.

4.9 TRAFFIC AND TRANSPORTATION

Representative Comment(s)

TfNSW is not supportive of the applicant's position that the proposed modification "would not result in an increase of any Quarry related heavy vehicle movements on the approved transport route" and "No traffic related impacts would occur from the transportation of material to the Quarry Site that would not already be assessed as part of external developments". TfNSW believes that the importation of VENM and ENM rehabilitation materials into the quarry and any traffic related impacts will need to be assessed as part of this development and not as part of non-related developments from which the VENM and ENM will be obtained. No assessment of traffic related impacts as a result of the proposed changes has been provided as part of the current application. To ensure adequate consideration is given to traffic related impacts TfNSW requests the applicant prepare a supporting traffic assessment for the proposed importation of VENM and ENM that includes, but is not limited to, to the following:

- a) Details on the maximum number of additional vehicle movements (daily and yearly) that will deliver VENM and/or ENM rehabilitation materials into the quarry including how these numbers correlate to the daily and annual limits for which approval is being sought.*
- b) Details on the type of vehicle(s) and their maximum carrying capacity that will deliver the VENM and/or ENM rehabilitation materials into the quarry.*
- c) Confirmation if vehicles delivering VENM and/or ENM rehabilitation materials will be back-loading or will be separate from vehicles collecting materials from the quarry.*

- d) *Details on how the numbers of vehicles associated with the delivery of VENM and ENM will be monitored to ensure ongoing compliance.*

Transport for NSW

Response

The following subsections provide a traffic assessment for the proposed importation of VENM and ENM.

Additional Vehicle Movements

As noted in Section 4.8.3, the material imported to the Quarry occurs on an irregular campaign basis and is wholly dependent on the generation of materials at nearby developments. Therefore, it is not possible to predict the timing, scale, or volume of material importation on a monthly or annual basis.

As noted in Section 4.8.3, backfilling of despatched Quarry vehicles upon their return to the Quarry would be prioritised. Therefore, instead of an empty heavy vehicle returning to the Quarry, the Quarry would receive material from a vehicle which was already scheduled and approved to arrive.

Approved Transportation Limits

The approved transportation limits for the Quarry are defined by Condition 8 of Schedule 2 of PA 08_0143, reproduced as **Table 1**. It is noted that there would be no exceedances of these approved movements as a result of importation of materials.

Table 1
Approved Transportation Limits

Period	Maximum Laden Truck Dispatch
7:00am – 10:00pm	40 in any hour
10:00pm – 7:00am	23 in any hour
5:00am – 6:00am (Monday to Friday only and excluding Public Holidays)	27
6:00am – 7:00am (Monday to Friday only and excluding Public Holidays)	38
24-hour calendar day	500

Vehicle Types and Maximum Carrying Capacity

The original EA for the Quarry (InSite, 2011) identifies the following types and proportions of heavy vehicles which are used for product transportation at the Quarry.

- 13% Rigid Truck (up to 10m in length);
- 62% – 71% Truck and Dog trailer combination (up to 19m in length); and
- 16% - 25% Semi-trailer (up to 19m in length)

Considering that most heavy vehicles utilised for transport operations at the Quarry are Truck and dog trailer combinations, it can be considered that the average maximum carrying capacity of heavy vehicles which will be importing materials would be approximately 35t for B-Double.

Monitoring

Section 4.5 of the *Modification Report* notes that Hanson would maintain records of material import that would also allow for any potential impacts that are the subject of community complaints to be identified on an on-going basis. Monitoring will be undertaken in accordance with the approved *Transport Management Plan* for the Quarry.

Section 2.7 of the *Transport Management Plan* identifies that vehicle departures at the Quarry are controlled by the Weighbridge Operator who, through use of the SAP system as well as manual counting, monitors the number of heavy vehicles that leave the site. Alarms in place within the SAP system notify the Weighbridge Operator when heavy vehicle movements have reached consent limits, and the Weighbridge Operator will be effectively “locked out” of the SAP system. If an hourly vehicle movement limit has been reached the Weighbridge Operator will stop ticketing on the weighbridge until the next window opens to re-ticket.

It is noted that should approval for the proposed modifications be granted, the *Transport Management Plan* will be reviewed and updated to reflect any operational changes that may come about as a result of the proposed modification, including monitoring of incoming materials.

4.10 COMMUNITY ENGAGEMENT

Representative Comment(s)

As noted in the modification report, the local community has raised concerns regarding the proposed amenity barrier, likely due to a lack of information provided by Hanson. Hanson should ensure they provide contemporary information to the local community through the Community Consultative Committee (CCC) in accordance with the Project Approval and at any time a community enquiry is received.

NSW Environment Protection Authority

Response

Hanson notes the concerns within the local community surrounding the proposed modifications to amenity barriers at the Quarry and contends that this may be attributable to a lack of information provided by Hanson to the local community.

In order to alleviate community concerns and to ensure transparency, Hanson commits to continue to provide contemporary information to the local community through the CCC in accordance with Condition 6 of Schedule 5 of PA 08_0143 and at any time a community enquiry is received.

5. EVALUATION

5.1 INTRODUCTION

This section provides an update to the evaluation of the merits of the proposed modification presented in Section 5 *Modification Report*. It takes into account amendments made to the Project and refinements to management and mitigation that have been made in response to the submissions received from Government agencies, organisations and the public. As assessment outcomes have not changed as a result of the review of submissions, this section presents the relevant updates to the merits of the Project. That is, this section does not replicate or supersede the evaluation of merits presented in Section 5 of the *Modification Report*, except where it discusses the amended outcomes of assessment. A final review of the public interest is provided in conclusion to the document.

5.2 AMENDMENTS AND REFINEMENTS TO THE PROJECT

There have been no specific changes to the Project in response to the submissions received from Government agencies, organisations and the public. Rather, this document offers several clarifications regarding the proposed modifications, particularly with respect to the locations of amenity barriers (see Section 4.2) and importation of materials (see Section 4.8). Clarification has been provided with respect to the types of materials that may be imported to expand the permitted import of material to include any materials permitted under an exemption provided under Clauses 91 and 92 of the *Protection of the Environment Operations (Waste) Regulation 2014*.

5.3 UPDATED CONTEXT FOR THE PROJECT

A thorough analysis of the statutory and strategic context for the Project was presented in Section 3.1 of the *Modification Report*. It is considered that the outcomes of the response to submission do not change the statutory or strategic context of the Project, and that no further consideration on these matters is required.

5.4 UPDATED JUSTIFICATION OF THE PROJECT

5.4.1 Social and Economic Considerations

As described in Section 4.6 of the *Modification Report*, the proposed modification is not likely to result in any direct changes to the social or economic environment of the Quarry. The construction of amenity barriers is considered likely to improve overall views of the landform and therefore improve visual amenity in the vicinity of the Quarry, particularly when viewed from areas to the north as noted in Section 4.3 of this document. This may have a benefit for some members of the community in terms of their experience of the local environment and sense of their homes and surroundings.

5.4.2 Biophysical Considerations

A detailed summary of the biophysical outcomes of assessment for the Project was presented in Section 5.2.1 of the *Modification Report*. There have been no changes to the outcomes of technical assessments as a result of review of the Government agency, organisational and public submissions received following public exhibition of the *Modification Report*.

Additional clarification has been provided in relation to management of transport activities as requested by TfNSW, however these matters do not change the outcomes of assessment of potential road transport risks. No other additional management or mitigation measures relating to biophysical considerations are proposed.

5.5 THE CONSEQUENCES OF NOT PROCEEDING WITH THE PROJECT

The consequences of not proceeding with the Project are discussed in Section 4.2 and relate directly to the additional environmental impacts associated with the removal of constructed amenity barriers. These remain largely unchanged since the exhibition of the *Modification Report* and are presented in Section 5.2.3 of that report.

5.6 CONCLUSION

As clarified in Section 4, the proposed modification would not result in any additional environmental impacts that are not consistent with those currently approved under PA 08_0143. While there would be campaigns of material import and emplacement, the environmental impact of these campaigns are expected to remain consistent with those currently approved. It is noted that retaining the constructed amenity barriers would result in an overall increase in the visual amenity of the already approved operations within the Quarry Site.

As noted in Section 4.8, the importation of fill materials to the Quarry Site would only occur on an ‘as available’ and ‘as required’ basis, allowing for greater control of the proposed operations.

Environmental management at the Quarry would continue in accordance with the approved management plans and internal Hanson procedures. This *Submissions Report* demonstrates that potential impacts associated with visual amenity, operational noise and dust and traffic changes would continue to be acceptable and generally consistent with the existing approved operation.

On balance, the proposed modification would be in the public interest as it would enable the ongoing beneficial use of the material generated by development elsewhere and would improve the visual amenity for neighbours to the Quarry.

6. REFERENCES

Heggies (2010). *Air Quality Assessment for the Bass Point Quarry Extension Project*

Insite Planning Services (2011). *Environmental Assessment – Bass Point Quarry Extension Lot 22 DP 1010797.* Prepared for Hanson Construction Materials Pty Ltd. Available from <http://www.hanson.com.au/About/Regulatory-Information/Projects/Bass-Point-Quarry-Project>

Appendix 1

Register of Submitters

(Total No. of pages = 2)



Table A1.1
Register of Submitters

Submitter	Visual Amenity	Testing and Certification of Materials	Air Quality	Importation and Classification of Materials	Rehabilitation	Transportation of Materials
Leslie Brooks	Section 4.3	Section 4.8.4	Section 4.4	Sections 4.8.2 and 4.8.3		
Vicki Steele		Section 4.8.5	Section 4.4		Section 4.7	
Australand Corporation (NSW) Pty Ltd – Frasers Property Australia Pty Limited						Section 4.8.1