

Review of the Liverpool Range Quarry proposal EIS

Review by

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Statement1:

This is far from a complete review or analysis for this project because of the insufficient time allowed for the tasks. This project is not time critical therefore an extension of time till the third of January 2025 is required and hereby requested.

You say in this report that there has been little feedback from Community members however you must understand that the Community are not paid to review and correct your work and we have other fulltime lives to lead. You have failed to communicate sufficiently and to allow adequate lead times, your public meetings have tended to be run with insufficient notice, during the day when people are working to earn a living and the meetings have tended to be lectures about what will happen as opposed to what is proposed and you have never been prepared to listen sincerely to community input at the meetings that I have attended.

You must lift your game significantly in this regard.

Statement 2:

It is clear to the reviewer that the location of the proposed mine has been chosen to suit the financial interests of some parties, including the landowner of the proposed site. We consider this approach to be unacceptable because;

- it significantly increases the disturbed area related to the project;
- it places at greater risk at least 4 species of bird and tree, identified in the report as endangered, who use or occupy this land;
- it increases the distance of truck movements throughout the duration of the project by approximately 5 kilometres each way compared to possible alternative locations;
- the long term visual scaring of the site, given the very limited restoration proposed.

This land is RU1 Agricultural, and is not zoned, nor should it ever be zoned for an industrial quarry that the owner of the land may wish to establish post project completion.

What other Quarry sites have been considered? For example the existing small quarry (at - 31.7533742, 149.9092999) along State Forest Road which is the gravel road that runs up to the entrance to the Coolah Tops National Park from the junction of Coolah Creek Road and Pandora Road. This road has already been earmarked for upgrade to accommodate the Turbines.

Extracts from the UmWelt Final Project EIS

Project Review.

Summary - Proj. Overview

The Project is seeking to access a high quality, hard rock resource suitable for producing a range of products *for the sole purpose of supporting the construction, operation and maintenance of the approved Liverpool Range Wind Farm* (LRWF) project (SSD-6696), currently subject to the assessment of a modification application (Mod-1). Tilt Renewables Australia Pty Ltd, as a trustee for Liverpool Range Wind Farm Project Trust (Tilt Renewables), is the proponent for the LRWF project.

And at Introduction 1.2

“Annual production from the Project is anticipated to be up to 700,000 tonnes per annum (tpa) and all materials produced by the quarry will supply the LRWF project only.”

Response

- What happens to the quarry when its resources are depleted? Will it become the land fill for obsolete turbine blades, batteries, solar panels? What measures will be put in place to prevent this?
- What measures are proposed to close the Quarry on completion of the Wind Turbine project?- What landscape restoration measures are proposed and will a bond be required to cover the cost of restoration as are required for other open cut quarrying projects. The provisions listed at 6.35, (actually 6.34) are seen as inadequate, under these provisions the quarry would remain a scar in the landscape forever or until someone decides it could be used as a tip! This land should be restored to useful farming land or an ecological safe space. Provide visual aids to make clear the shape and finish of the landform post ‘restoration’ referred to in Table 6.34; this poorly written and incorrectly labelled table does not adequately communicate the final situation.
- Will the access road to the quarry, approximately 5k in length, be removed on completion of the restoration phase?
- At 6.16.1.4 you refer to many post rehabilitation measures as “....as required” Who determines what is required? The developer with a financial interest in doing nothing in preference to actually doing the fertilising or watering at I as listed?

NOTE; there are significant errors in what is supposed to be a ‘Final’ version of the EIS such as a Table of Contents that refers to table 6.35 which actually does not exist. I expect the actual table is 6.34 which is so poorly written that much of it is unclear and open to multiple interpretations. *How can the content of such an important document be trusted if such communication basics are not correct?*

Haulage of quarry materials is the single largest contributor to heavy vehicle traffic movements associated with the development of wind farms, generally comprising more than 60% of all heavy vehicle movements. Therefore, sourcing materials close to the LRWF project area will have significant benefits for both the LRWF project and community including:

- reduced haulage costs
- a substantial reduction in heavy vehicle movements on the surrounding local and regional road network, which results in significant improvements to road safety and community amenity
- reduced greenhouse gas emissions associated with reduced haulage distances.

Response

- If the above reasons for constructing a quarry in the region of the turbine project are true, why is the quarry not being proposed immediately along one of the turbine paths? Given that the geology of the area is most likely to be consistent the location of a suitable quarry site along one of the turbine connection roads should be possible and would significantly further reduce travel distances and delivery times, by approximately 10k for each trip, and most importantly reduce the physical and visual destruction and division of further rural lands and its potential siltation impact on streams.
- Explanations given in the section "[What alternatives were investigated?](#)" are not acceptable without further detail of all geological investigations undertaken, it is illogical to propose that this one knoll is somehow different from all of the other ridges in this area or along the Wind turbine development roads. For example the existing small quarry (at -31.7533742, 149.9092999) along State Forest Road, a gravel road that runs up to the entrance of the Coolah Tops National Park from the junction of Coolah Creek Road and Pandora Road is already used for road surfacing. State Forest Road has already been earmarked for upgrade to accommodate the Turbines.

Table S1 - response

- The proposed duration is nominated as "[Approximately 3 to 4 years](#)", what conditions are proposed to ensure that the 4 years is a maximum duration, including landscape restoration? If no conditions are proposed why not? If conditions are not imposed the developer will effectively have open slather to run the quarry for as long as it pleases them!
- 6pm is too late a finishing time, especially in winter, 5pm is more reasonable.
- Re hours of operation, how will your conditions ensure that 'overtime' is not worked?
- The project and disturbance areas are shown as equal in size, does this include the currently included road to the quarry?
- What conditions will be imposed on notifying the community re blasting? The community should be notified well in advance of any blasting activity.
- The Quarry is set on a ridge and blasting at the edges has the potential to destabilise the narrow band of rock / earth that is not to be quarried, (see your own section drawing) how will this be managed and how will any potential 'spill' of material be managed the ensure that no stream or river is affected by the quarrying works?
- "[Rehabilitation and Final Landform](#)" - the information provided at this point is insufficient, a full design proposal based on currently known information should be provided to give the Community confidence in the final project landscape design.

“Why is the project Needed?”

- This project is NOT needed; none of this or the Wind Turbine projects would be needed if our Governments had the common sense to build Nuclear Power generation plants at the locations of existing Coal Fuelled generation plants. This project and the REZ as a whole is a very unwelcome and destructive imposition on our communities and environments. You must stop referring to these projects as “farms”, they are not farms, they are an industrial complex.
- This project is not to support the “Region associated with the Project”, it is to support Cities who have no concept of the level of destruction being wrought on the regions to feed a flawed immigration policy and cities that show no restraint in their power usage..

“What planning and approvals process applies?”

- I submit that the planning process imposed represents a conflict of interest in that the assessing body is/ are Government bodies and the project proposed is the result of a flawed Government policy, and in particular one that is not supported within the affected Communities.
- Why is this quarry project not proposed as part of the wider (wrongly named) Tilt Liverpool Planes Wind Turbine Project, why is it a separate project with a separate planning process given the statement within this report that it is *“for the sole purpose of supporting the construction, operation and maintenance of the approved Liverpool Range Wind Farm”* ? This application must be required to be withdrawn and resubmitted as a variation to the Tilt Wind Turbine project.

“How has the Proponent engaged with Stakeholders?”

- Contrary to their assertions, attempts at public consultation have not been visible nor active. I did not become aware of this project until I received an email from a local action group on the 15th November 2024.

“Noise”

- It is not good enough to “predict” that noise levels will ‘comply’, unconditional assurance MUST be given that noise levels will comply with relevant standards with significant penalties attached for every reported non-compliance. Continuous monitoring at sources and receivers must be provided. To state that compliance is “predicted” is ignorant and lazy indicating that the project team have not done adequate research and validation into this critical matter.

“Blasting”

“The proponent will implement a blast monitoring system, pre-blast assessment protocol and a public notification system.”

- The blasting protocol should be published as part of the DA application to allow all affected to review, understand and provide feedback BEFORE any approval is given.

“Air Quality and Greenhouse Gas”

Emissions could be further reduced by co-locating the quarry with the Wind Turbine project roads. Insufficient attempts to identify possible alternate locations for the quarry have been made. See my

notes in a previous section. This is another reason why this DA application should be part of the larger project application.

“Water Resources”

"Impacts on groundwater quality or quantity are considered unlikely during construction and operation and no groundwater interactions or adverse impacts to aquifers are predicted as a result of the Project. In addition, there are no known groundwater issues (e.g. contamination) in the vicinity of the Project Area."

- It is not good enough to simply state that "..... noadverse impacts to aquifers are predicted ...". Given that the surrounding communities rely totally on the existing ground water aquifers you must state your understanding of this fact and provide details of exactly how the applicant will prevent any permanent depletion or contamination of those resources to be considered as part of this application.
- The potential impact on "downstream users due to the Project Water Management System catchment area" any design against failure must be guaranteed to be nil with serious fines and requirements for rectification imposed as a condition of any approval of this application.

“Biodiversity”

"The Project will result in residual direct impacts to native vegetation communities and threatened species habitats within the Disturbance Area as a result of vegetation clearing. This includes impacts to the following threatened ecological communities and species:

- PCT 483 Grey Box x White Box grassy open woodland on basalt hills in the Merriwa region, upper Hunter Valley
- barking owl (*Ninox connivens*)
- the BDAR has also assumed presence (and therefore potential impacts) on the following two species however further surveys are being undertaken to confirm presence or absence of these species:
 - pink-tailed legless lizard (*Aprasia parapulchella*)
 - striped legless lizard (*Delma impar*).

Only one entity listed under the EPBC Act has been recorded in the Project Area which has the potential to be significantly impacted by the Project, being the White Box-Yellow Box-Blakeley's Red Gum Grassy Woodland and Derived Native Grassland CEEC (Commonwealth Box Gum Woodland CEEC) associated with PCT 438. Approximately 3.2 ha of the 19.5 ha Project Area meets the BC Act and EPBC Act listing criteria for this community "

- **Given the Federal Minister for the Environments recent decision to reject a Gold mine at Blayney AS A PRECEDENT and the above acknowledgement of the existence of or predicted existence of endangered species within the area of the project this application **MUST BE REJECTED WITHOUT FURTHER CONSIDERATION.****
- **Bio Diversity offsets are a farce and must not be considered, you cannot just determine that the Trees, Owls and lizards must move address and live somewhere else, a fact clearly acknowledged by the Minister in her making a decision to protect the Blue Striped Bee!**

“Traffic and Transport”

- Driver Fatigue is a concern for the developer, it is a financial matter, if fatigue is anticipated employ more drivers; this is not an issue for Local Community concern.
- Again, length, time, dust created, maintenance and resultant cost for a trip can be further reduced by co-locating the quarry with the Wind Turbine development roads.
- You mean that the Associated Resident can more easily be bullied!

“Visual”

“..... the visual impact rating for the three dwellings with potential views of the Project Area is considered negligible.”

- What steps are you proposing to ensure that there is NO negative visual impact for the 3 affected households both short and long term? Are you proposing any sort of screening and if so where and of what?
- The statement in 6.13.1 that “The ZVI is a preliminary assessment tool based on topography alone and does not consider the impacts of screening elements such as vegetation and structures.” is ridiculous in the extreme! You cannot assess the aesthetic of a visual landscape based on a topographical analysis. Landscape is 20% landform and 30% vegetation and 50% atmosphere including light and weather impacts! Did these people actually visit the site and if so when? Where do they live ... in the City no doubt without a love for the country they are attempting to assess. What Community input was there into this visual assessment, what input were the 3 residences able to provide NIL?

“Social”-

- Confirm that people who are living in the community local to the project WILL be offered first choice of jobs on the project for the duration of the project?
- Confirm that funds contributions will be spent in the communities directly affected and not consumed by Councils for projects unrelated to the affected communities.
- Increased road safety claim is a fallacy as you are comparing the road use numbers to guesstimated numbers included in the tilt project, not what exists NOW, the fact is that there will still be greatly increased road use in the vicinity of both projects!

“Overall, the benefits of the Project in relation to reduced impacts associated with quarry product haulage for the LRWF project on the broader road network have been rated as ‘High’.”

- This statement is false as the negatives have only received insincere assessment by people who are not personally affected AND there is an alternative to this and the Wind Turbine project that would require none of the lands, environmental degradation and consequent additional release of greenhouse gasses associated with both projects – build nuclear power plants adjacent to the existing coal fired plants. The existing moratorium against Nuclear power is not an argument against this as the moratorium can be easily withdrawn by Parliament.

“Economic”

- This project is funded by lies and hidden \$, there is no real economic benefit to be had, only long term loss both now and in the future when the Turbines fail and are left to rot because there is no enforceable funded make good plan.
- This project, if the Minister approves it, must be approved under the same make-good conditions as the Coal mines in Australia.

“Rehabilitation”

- Detail provided in this section is inadequate and the statement that the land is to be stabilized is also inadequate. The land must be restored to allow for a suitable ongoing use

that will benefit the Community and Landholder in the same way that Coal Mines are required to make good post closure. Huge scars left in the landscape are unacceptable.

6.16.1 Rehabilitation strategy

- Why doesn't this strategy consider the residual visual impact as required to do by the LEP? To the local community this is as important factor as the technical stabilisation of the land; we do not want residual scars!
- Diagram at 6.14 does not show the access paths into the main pit and does not explain how the pit will be maintained to ensure safe access to and egress from the pit. Will this pit be accessible by vehicle or foot only? Why could the south eastern end of the pit not be graded to say 15deg as part of the extraction process; the existing natural contours would assist this option? This would allow for greater potential for productive reuse of the pit!
- This proposal does not respond adequately to the issues outlined in "6.16.1.1 Relevant land use plans or policies" because it removes currently productive farming land from use that will not be fully restored under this plan. A far more sympathetic response to the relevant land use policies would be to co-locate the mine with the Wind turbine road system as this would greatly reduce the amount of existing farming disturbed land disturbed by the project, including approximately 5k of access roads and 10k of return trip distance and time for every trip.

6.16.1.2 Rehabilitation Objectives

- State what future uses have been considered and discussed with the land owner, this must not be 'hidden'!
- What specific "surface infrastructure" is being referred to when you say "(unless retention is approved by the detailed closure planning process as agreed with the landowner)" All such considerations must be disclosed now!
- What screening measures are proposed especially for the three visually impacted residents? Presumable natural screens would be used? What plant species will be used to provide both short and long term screening?
- In what form will the retained vehicle access be? Is it proposed that it remain capable of carrying 'future' gravel laden trucks ... what "... future use ..." is foreseen and allowed for?

6.16.1.3 Proposed Rehabilitation Methodology

- The EIS states "The Main Pit and ancillary areas will generally not become available for rehabilitation until active operations have fully exhausted resources in that area and ancillary areas for processing, stockpiling and laydown activities are not required." and "At the end of the operational life, onsite" This is different to the previous statements that the quarry would have a life limited to the timeframe of the construction of the Wind Turbines! The statement in this section would only be true if the quarry were to be exhausted at the same time that the construction project was completed. You must either correct the above statement or rewrite the report to reflect any intention for this to be in fact and application for the quarry to exist until it is exhausted.
- Define "post-closure land use ..." in the context of this report / project? Is it your intention that this means until completion of all restoration works, if not please fully detail the project intent?
- Habitat enhancement and revegetation – The collection of seeds from trees and grasses must be undertaken as trees in the area of the project are listed as endangered. Collection

and germination of seeds would enable the replanting of indigenous species thus improving the viability of the planted stock and retaining the natural look of the vegetative landscape.

- Weed and pest management – given the distance of the quarry from the end use turbine build enclosed vehicle wash-down areas should be created to limit the potential transfer for weeds and pests both onto and off site. This practice is commonly used on Australia's Army Bases, the Lone Pine Barracks being one example (-32.6328429, 151.1709805).

Statement:

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- You say in this report that there has been little feedback from Community members however you must understand that the Community are not paid to review and correct your work and we have other fulltime lives to lead. You have failed to communicate sufficiently with adequate lead times, your public meetings have tended to be run during the day when people are working to earn a living and they have tended to be lectures about what will happen as opposed to what is proposed and you have never been prepared to listen to community input at the meetings that I have attended. You must lift your game significantly in this regard.