

Your Ref: MP08_0143 Mod 6
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MP08_0143 – Bass Point Quarry – Mod 6 Recycling – Response to Agency Submissions

I refer to the modification application submitted by Hanson Construction Materials Pty Ltd (Hanson), for a proposed recycling activities at the existing Bass Point Quarry, Shell Cove.

Submissions have been received from a Shellharbour City Council and the Environment Protection Authority (EPA). The issues raised in these further submissions are summarised below, and a detailed response to each issue raised is provided.

Matter/Recommendations	Response
Environment Protection Authority	
1. Water	
<p>a. Tonnage limits on quantities of concrete waste and recycled glass to be stored at the Premises at any one time</p>	<p>Maximum stockpile size for received concrete and glass would be 16,000 tonnes and 4,000 tonnes respectively, in the location shown in Figure 4 of the Modification Report. After processing the recycled concrete and glass will potentially be blended with other crushed rock / aggregate products from Bass Point Quarry, and stockpiled as part of the broader quarry products stockpiles.</p>
<p>b. Pollutants likely to be generated by introduction of rainfall into stockpiles of crushed concrete and recycled glass.</p>	<p>Given that glass has already been crushed at the supplier premises, and will meet the standards set out in the Recovered Glass Sand Order 2014, no pollutants or contaminants are expected to be generated by introduction of rainfall into the crushed glass stockpiles.</p> <p>Waste concrete will arise in solid pieces from concrete batching plants only. It will not arrive as part of a general solid waste stream or general construction / demolition waste stream. The site in particular will not receive un-separated loads from demolition and construction contractors or drive up loads of waste from the general public. As such, it will be free of general waste contamination. If small amounts of non-recyclable material are mixed into the loads received at the facility (i.e. less than 1%) this would be separate and taken to an appropriately licenced waste management facility for recycling or disposal. Concrete is a stable and benign product that does not generate significant amounts of leachate if stored for only short periods of time. Long term leaching of hydration products can occur if concrete is left to deteriorate over longer periods of time – releasing small amounts of sodium, calcium and potassium. As the concrete stockpiles at the Bass Point Quarry will only be stockpiled for short periods of time, no significant pollutants are expected to be generated by introduction of rainfall into the feed concrete stockpile.</p>

Matter/Recommendations	Response
<p>c. Adequacy of existing surface water management controls to capture, direct, store and treat leachate from crushed concrete and recycled glass.</p>	<p>Dissolved salts arising from concrete and glass stockpile leachate would not be dissimilar to the salts and other dissolved solids currently arising from the quarry pit areas. The proposed recycling area is located within the Eastern Pit stormwater catchment zone, which generates an excess of approximately 1,638 Megalitres per year of water requiring discharge. The eastern pit catchment is approximately 31 hectares in area. Stormwater is first collected in quarry voids before being transferred to sedimentation basins prior to discharge via one of the site's licensed discharge points to the ocean. The existing stormwater management system is therefore considered suitable for management of leachate arising from recycled concrete and glass stockpiles.</p>
<p>d. Consider additional controls needed to adequately prevent, capture, store, and treat leachate.</p>	<p>Hanson would propose to install to a bund around the stockpiles with a collection pit to collect the first flush of stormwater runoff from the stockpiles in any rain event. The collected stormwater would be reused for dust suppression.</p>
<p>2. AIR</p>	
<p>a. Explain if glass material will meet the conditions of the Recovered Glass Sand Order 2014 under the Protection of the Environment Operations (Waste) Regulation 2014 upon receipt at the Premises</p>	<p>Yes it will.</p>
<p>b. Identify quality control measures to be implemented to ensure recycled glass is free of contaminants (including leftover residues) prior to arriving at the Premises.</p>	<p>Documentation will be provided by the supplier in accordance with the Recovered Glass Sand Order 2014, confirming compliance with the chemical properties of the Order. Hanson would also undertake a visual inspection before tipping to verify that there has been no introduction of general waste to the load.</p>
<p>3. WASTE</p>	
<p>EPA sets out in its submission the relevant waste reporting requirements that would apply to recycled products.</p>	<p>Hanson will comply with all relevant waste reporting requirements.</p>
<p>Shellharbour City Council</p>	
<p>1. General</p>	
<p>a. We request clarification of the 'subsidiaries' and 'third party' glass suppliers, including specific locations, and a list of subsidiaries and third parties. These details will have assessment implications for traffic and quality of materials.</p>	<p>Concrete would be supplied from batching plants owned and operated by Hanson, or its associated entities including Hanson Constriction Materials and Hymix.</p> <p>Glass will be supplied by Visy waste management facilities at Penrith or Smithfield.</p>
<p>b. The height of the proposed recycling equipment has not been specified. We request clarification of the height, noting the maximum building height of 9 metres applicable to the site under the Shellharbour Local Environmental Plan 2013.</p>	<p>The height of proposed recycling equipment will be up to approximately 7m, well below the height limit of 9m.</p>

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<p>c. The site is located within a 'Coastal Use Area' pursuant to the SEPP (Resilience and Hazards) 2021. The modification report must address Part 2.2 of the SEPP.</p>	<p>Clause 2.11 requires a consent authority to consider whether a development proposal would have an adverse impact on the following matters.</p> <p>The proposed modification includes recycling equipment and activities within the Bass Point Quarry operational area. As such, the equipment and activities:</p> <ul style="list-style-type: none"> (i) Are not located in the public domain and will not have any impact on safe access to public coastal use areas including any foreshore, beach, or rock platform, and will not funnel wind to or from any public places. (ii) Is not located in a prominently visible location, and so will not adversely impact any scenic qualities of the coast, and will not overshadow any public places or adversely impact views between public places and the foreshore. (iii) Are located in any area of very high disturbance meaning there is minimal potential for Aboriginal or non-Aboriginal cultural heritage values to be present. (iv) Would be surrounded by existing quarry related landforms, equipment and activities and is commensurate with that context.
<p>d. Both the Surface Water Management Plan (2019) and Air Quality Management Plan (2021) have not been updated since their respective drafting dates. These should be updated with recent monitoring results, in addition to an impact assessment of the cumulative impacts from the existing and proposed works, providing specific mitigation measures for the proposed Mod 6 – aggregate recycling works.</p>	<p>Hanson would accept a condition of consent for Modification 6 to update the Surface Water Management Plan and Air Quality Management Plan prior to receiving waste concrete and glass for recycling.</p>
<p>e. The average annual criterion for PM10 for the averaging period has been recorded as two different values within the Air Quality Management Plan. Within section 4, it is recorded as 30µg/m³, and in section 6, it is required as 25µg/m³; this should be clarified within the amended report.</p>	<p>The AQMP will be updated to reflect the correct current PM10 criterion.</p>
<p>2. TRANSPORT</p>	
<p>a. Council is currently undertaking a Safe Systems Assessment of the junction of Dunmore Road and Southern Cross Boulevard. This junction is currently serviced by a painted seagull island to facilitate the right turn into and south of Southern Cross Boulevard. The road surface at this junction has deteriorated, largely due to the 500 truck movements per day generated by the Bass Point Quarry. Preliminary investigations indicate that the junction should be upgraded to a roundabout. The proposed treatment would significantly enhance road safety and network efficiency at this junction.</p> <p>Condition 33 'Transport Management Plan' within the current consent requires the preparation and implementation of a Transport Management Plan (TMP) for the Bass Point Quarry. However, the condition and TMP do not provide explicit consideration to the growth or change of traffic demand in the region. Given the significant increase in traffic demand along Dunmore Road, which is expected to continue growing, it is recommended to input a mechanism within this condition to require revision of the traffic impacts and TMP at a regular interval.</p>	<p>It is not the job of the project to assess or manage underlying traffic growth. The proposed modification does not generate additional traffic so there is no nexus to require further assessment of traffic impacts.</p> <p>It is highlighted that Mod 2 included detailed assessment of traffic impacts, as well as a revised Transport Management Plan. Section 3.1 of the revised Transport Management Plan sets out a schedule for review and update of the Transport Management Plan, including after each Annual Review, Environmental Audit or Modification Approval. It is considered that this provides a sufficient arrangement for review and update of the Transport Management Plan.</p>

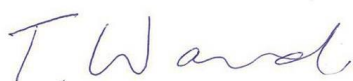
Matter/Recommendations	Response
<p>b. The current TMP and consent provides numerous measures for vehicle requirements moving from the quarry, but provides limited measures or requirements for vehicles arriving to the quarry. Specifically, the following should be considered:</p> <ul style="list-style-type: none"> - General vehicle requirements and movements for delivery of materials to the quarry. - The definitions of 'haulage route' and 'laden trucks' may require amendments to account for laden trucks arriving to the site. - The 'laden trucks' definition only accounts for excavated natural material (VENM/ENM), and does not account for the delivery of recyclable materials. - A condition limiting the quantity of recycled product that can be delivered to the quarry, similar to the 'fill material transport and importation' condition within the current consent. - Condition 8 'Transport of Products' should be amended to account for the arrival of trucks carrying recyclable product. - Conditions 13 and 14 under 'Road Maintenance' should be amended to account for contributions required for delivery of each tonne of recyclable material. - The transport conditions (27-35 in Schedule 3) may require amendments to account for trucks laden with recyclable material being delivered to the site. For instance, conditions which account for the delivery of recyclable material by Bass Point Quarry Road (condition 27), the arrival of laden trucks in a controlled and/or scheduled manner to minimise queueing and delays (condition 29), and accurate record-keeping for laden truck movements and delivery of recyclable materials, including where the materials are sourced from (condition 31). - Arrival of laden trucks introduces some greater risk of spill enroute to the site. Please ensure the 'incident or breakdown' response measures are adequate to address this risk. 	<p>Revision of the Transport Management Plan to address these suggestions can be completed as a condition of consent for Modification 6.</p> <p>The only issue raised by Council that we would object to relates to the imposition of a contribution of the road contribution of incoming materials. This would have the effect of Hanson double-paying contributions for this material.</p>
<p>c. While the number of trucks arriving to the site will remain the same, it is unclear if the delivery of recyclable materials and operation of recycling facilities necessitate changes to the truck delivery routes, timing, or manoeuvrability when entering and traversing the site.</p>	<p>Recyclable materials would be arriving in the same trucks that already access the site, so will not trigger any changes to inbound haulage routes or manoeuvrability at site entry.</p>
<p>d. What are the noise, dust, traffic and environmental impacts of the trucks arriving laden with material?</p>	<p>Recyclable materials would be arriving in the same trucks that already access the site, and would be fully covered and compliant with dust and noise controls that apply to outbound trucks, so there will not be any increase in noise, dust or traffic impacts associated with inbound movements.</p>
<p>e. The current TMP states 'it is difficult to schedule arrivals to the quarry due to the different directions of approach from external jobs and the varying job completion times.' Further consideration, or revision of this commentary within the TMP is recommended, as poor scheduling of arriving trucks could result in adverse traffic impacts or operational efficiency</p>	<p>Revision of the Transport Management Plan to address this suggestion can be completed as a condition of consent for Modification 6.</p>

Matter/Recommendations	Response
<p>f. The current TMP indicates that uncovered loads and loose materials bears one of the greater risks to other road users. The plan notes measures for vehicles 'loaded with quarry materials', but not for vehicles delivering recyclable materials to the quarry. As the trucks will be arriving laden with recyclable materials, consideration should be given to the details and conditions required to ensure road user safety.</p>	<p>Revision of the Transport Management Plan to address these suggestions can be completed as a condition of consent for Modification 6. Inbound trucks laden with recyclable materials would be bound by the same rules as outbound trucks.</p>
<p>3. WASTE</p>	
<p>a. The current waste management plan only accounts for asbestos identified in the demolition works. The modification report provides some details on how asbestos will be handled if identified in the laden recyclable material. Consideration should be given to whether the asbestos and contamination procedures in the modification report should be conditioned, or the waste management plan updated.</p>	<p>Revision of the Waste Management Plan to address this suggestion can be completed as a condition of consent for Modification 6.</p>
<p>b. The Environmental Protection Authority will require consultation to approve a variation to the existing Environmental Protection License 2193 to modify the 'Scheduled Activity' listed on that license, in order to undertake the proposed activities</p>	<p>The EPA has been consulted as part of the assessment of Modification 6. EPL 2193 will be varied if required by the EPA.</p>
<p>4. NOISE</p>	
<p>a. The noise assessment details shown within the Modification Report and Environment Noise Assessment appears to show the noise for only the new equipment. It is unclear if the cumulative impact (existing + new) noise will meet the decibel requirements detailed in the consent. While the report notes that the new equipment achieves noise goals 10dB below the Approval noise limits, the cumulative impact may differ.</p>	<p>A Supplementary Noise Assessment has been carried out by Harwood Acoustics, and is attached. The Supplementary Noise Assessment has undertaken a cumulative noise impact assessment, using noise monitoring data from September 2023, which establishes the contribution of quarry noise at each of the receptors, and added the predicted noise level from proposed recycling activities under Modification 6. The cumulative noise impacts from the proposed recycling activities when combined with existing quarry noise levels remain well below the noise limits at all receptor locations.</p>
<p>b. A noise expert is recommended for consultation to assess the Environmental Noise Assessment Report.</p>	<p>We consider the noise levels to be such that there is not going to be any adverse impact from the proposed recycling equipment. Noting that the noise assessment carried out is conservative, and has been revised and assessed by noise experts within the EPA, we do not consider it necessary for the Department or Council to engage an expert to carry out this assessment.</p>

We trust the above and attached additional information addresses the comments raised by Council and the EPA and allows the Department to finalise its assessment.

Should you have any queries about this matter, please do not hesitate to contact the undersigned.

Yours sincerely,



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