

Your ref: SSD-65146459
Our ref: 2127708
05 November 2025

Carl Dumbleton
Department of Planning, Housing and Infrastructure

Via email: carl.dumbleton@planning.nsw.gov.au
cc katie.weekes@dpie.nsw.gov.au

Response to agency advice on the Supplementary Response to Submissions for Marulan Quarry (SSD-65146459)

Dear Carl

GHD Pty Ltd (GHD), on behalf of Global Quarries Australia Pty Ltd, prepared a Response to Submissions (RTS) in response to the submissions received during the exhibition period for the proposed Marulan Quarry (SSD-65146459). Further comments were received in response to the RTS and responded to in a Supplementary Response to Submissions, which was prepared by GHD Pty Ltd (GHD) on behalf of Global Quarries. The following Government agencies provided comments on the Supplementary Response to Submissions:

- Goulburn Mulwaree Council (Council)
- Conservation Programs, Heritage and Regulation (CPHR)
- Transport for NSW (TfNSW)
- Australian Government Department of Climate Change, Energy, the Environment and Water (DCCEEW)
- Crown Lands

All agency responses received have been responded to in Table 1.

In summary, it is considered that all issues raised have been addressed previously or can be resolved by the inclusion of appropriate conditions or post consent.

If you require any further information to assist with the assessment, please don't hesitate to contact me.

Yours sincerely



Karl Rosen
Technical Director - Environment
Karl.rosen@ghd.com



Ben Luffman
Technical Director - Environment
Ben.luffman@ghd.com

Government agency	Submission issue	Response
Goulburn Mulwaree Council (Council)	Stormwater Management and MUSIC Modelling Council acknowledges the proponent's position that the Blue Book Volume 2E is the industry standard for quarry stormwater management. However, Council supports WaterNSW's requirement for MUSIC modelling for impervious areas exceeding 2,500 m², particularly where the site is within a sensitive catchment. The supplementary submission indicates that the impervious area is approximately 3,300 m² and that a MUSIC model has been prepared. Council requests that the final stormwater management plan include: – Clear delineation of clean and dirty water catchments. – Integration of MUSIC modelling outcomes into the detailed design. – Confirmation that reuse basins are appropriately sized and located to achieve NorBE compliance. Council supports WaterNSW's position that zero discharge is not practical for this site but expects that discharge events are managed in accordance with Blue Book standards and appropriately monitored.	Global Quarries appreciates Council's recognition that the Bluebook Volume 2E (DECC, 2008) is the industry standard document for managing stormwater at quarry sites. Global Quarries is committed to preparation of a detailed stormwater management plan in consultation with both Council and WaterNSW prior to commencement of construction. The plan will build upon the conceptual stormwater management plan presented in Figure 5.1 of the Water Impact Assessment. The plan includes delineation of clean and dirty water flow paths and sediment basin sizing and will be further refined as part of the detailed design process and preparation of the stormwater management plan as a condition of consent. While not considered the most appropriate method of assessment for an extractive industry, a MUSIC model was developed as part of the supplementary response to submissions, for all potential hardstand or sealed surfaces associated with facilities (office, weighbridge, caparks, etc.). The MUSIC model demonstrated that a relatively low additional storage volume of 300 m³ to be distributed in stormwater reuse basins on the edge of the facilities and carpark areas would satisfy NorBE requirements based upon the MUSIC model and would be incorporated into the detailed stormwater management plan. Further detailed design undertaken as part of the SWMP will provide a more prescriptive plan for site operators to the level of detail required for implementation in accordance with 'The Blue Book' Volume 1 and Volume 2e.
	Traffic and Intersection Design Council maintains its position that a grade-separated interchange is the only safe and appropriate solution for access to and from the Hume Highway. The proposed at-grade intersection, even with amendments, does not adequately address: – Safety risks associated with heavy vehicle movements near Narambulla Creek Bridge. – Visual distraction and amenity impacts for highway users. – The precedent set by other State Significant Developments in the locality that have avoided direct highway exposure. Council requests that the Department consider requiring further design investigation in collaboration with TfNSW and other quarry operators to explore a future grade-separated solution.	We appreciate Council maintains a position that a grade-separated intersection is a preferred solution, however this not considered feasible or warranted given the scale of the project and the capacity of the existing road network. The new intersections have been designed in accordance with Austroads design guidelines following extensive consultation with Transport for NSW who have provided recommendations for conditions of approval. The design includes a left in deceleration lane of 189 metres including grade correction and a diverge taper of 39 metres with ample site distance to avoid conflict with through traffic or comprise additional safety risk at Narambulla Creek bridge. An additional artist impression was prepared as part of the Response to Submissions, to indicate the predicted extent of views from the Hume Highway from Narambulla Creek bridge and demonstrates the quarry pit would not be visible and the processing area equivalent to any other rural enterprise located along the highway.

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		The relevant proximity to the highway is considered an advantage for the development as it provides near direct access to the highway and minimised haulage vehicles travelling on local roads or travelling directly passed any entrance to a residential property.
	School Bus Infrastructure and Planning Agreement Council notes the proposed turning circle and bus stop arrangement but reiterates that: – Infrastructure located partially on private land and road reserve is not acceptable without formal dedication. – A Planning Agreement may be required to facilitate land transfer and asset management responsibilities. Council is open to further consultation with the proponent and the bus company to develop a safe and practical solution, but this must be formalised through appropriate planning mechanisms.	Global Quarries is open to further consultation with Council, the school bus company and the community to develop a safe and practical solution for the bus stop. Global Quarries discussed the need for a planning agreement to facilitate a turning circle with Council in a meeting on 22nd July, 2025 and have a strong preference for a solution to be developed without a formal land transfer requiring a planning agreement. The turning circle and bus-stop were proposed to provide a benefit to the community in response to issues raised during community consultation for the project and provides a marked improvement to the existing school bus pick-up arrangements. The turning circle will be used once per day in a rural setting and effectively separates school children from any potential for interaction with haulage vehicles. Alternatively, operational controls can be put in place to restrict haulage when the school bus is at the intersection if agreement cannot be achieved for the implementation of the turning circle.
	Community Consultation and CCC Council remains concerned about the lack of direct engagement with residents of Winfarthing Road and the absence of an active Community Consultative Committee (CCC) following the reissue of SEARs. The CCC is a requirement under the SEARs and should be re-established to support ongoing engagement.	Global Quarries appreciates Council's concerns and support for issues raised by local constituents. However, extensive consultation has been undertaken as part of the project including the formation of the CCC together with a broader consultation program undertaken by both Global Quarries and GHD staff throughout the development of the project. There have been 12 CCC meetings and multiple other opportunities for residents of Winfarthing Road to express their views. We feel we have a good understanding of the concerns and have addressed them where possible e.g., detailed assessments on all aspects that may impact the community, proposing a solution to the school bus stop, undertaking the silicosis risk assessment and reported on the findings of each study as they became available. The final CCC meeting was held on the 24th October 2024 preceding the public exhibition of the EIS and an overview of all key issues to be included in the EIS was provided. The CCC was chaired by an independent chairperson sought advice from the Department regarding the ongoing use of the CCC following the reissue of the SEARs. All processes were followed and the process was described in the 12th CCC meeting on the 24th October, 2024. The CCC was established for the development of the quarry and is not expressly linked to any application number or request for SEARs.

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CPHR	Avoided areas The avoided areas do not have adequate protection measures to ensure the biodiversity values are retained The BDAR in its current form does not provide any ongoing protection of the lands identified as avoided land. Table 7.1 of the revised BDAR states 'The proposal is located in a range of land-holdings, including Crown Reserve and private property. Other land-uses in areas avoided by this proposal have the potential to impact biodiversity values in the future. The proponent has limited control over land use in areas not required for this proposal.' As there is no provision for protecting these areas they therefore cannot be considered avoided lands. Protection for these areas under a biodiversity management plan (BMP) or other agreement with the land holders would be needed to consider these areas as avoided lands.	The project site encompasses an area of 95 ha, includes two privately owned lots (Lots 3 and 4 of DP 247199) (approximately 82.2 ha), a lot currently owned by Crown Land (Lot 7001 of DP 1025585) and part of the Hume Highway road reserve. Global Quarries is currently in negotiations with Crown Lands to purchase or obtain a long term lease for Lot 7001 of DP 1025585. The disturbance footprint or proposal site referenced in BDAR includes an area of about 32.86 ha and has been designed to avoid impacts on biodiversity wherever practical as reported in section 7 of the BDAR. Global Quarries will have full operational control over the remaining 62.14 ha area within the project site and will implement measures to ensure remaining vegetation is not disturbed and considered avoided lands. BC04 in Table 8.6 of the BDAR indicates that: <i>Prior to the commencement of any work in or adjoining areas of native vegetation, a survey would be carried out to confirm the extent of the proposal site and to mark the construction impact boundary. The perimeter of this area will be fenced using high visibility fencing and clearly marked as the limits of clearing. All vegetation outside this fence line will be clearly delineated as an exclusion zone to avoid unnecessary vegetation and habitat removal. Fencing and signage must be maintained for the duration of the construction period. Fencing should be designed to allow fauna to exit the site during clearing activities.</i> Ongoing extraction and processing activities will be limited to the operational footprint and the retained vegetation will not be impacted by the project activities. Further specifications can be articulated in a Biodiversity Management Plan to be prepared prior to construction.
	Measures to minimise impacts have not been adequately addressed Section 7.3 of the revised BDAR does not contain details of how the actions listed in table 7.2 will be implemented. CPHR note that measures relating to these some of these actions are listed in other parts of the BDAR, reference should be made to these in section 7.3. Details should be provided for each action listed in the table including; Reducing the proposal footprint and concentrating development in non-native or poor condition vegetation. – Providing an adequate buffer between the proposal footprint and mature trees, and water courses adjoining the proposal footprint.	The majority of the actions listed in Table 7.2 of the BDAR have been implemented during the Site Selection, Preliminary Design and Design of the proposal, as indicated by the Timing column. The extraction footprint is limited by the central location of the target geological resource and the disturbance footprint has been reduced from 10.6 ha to 7.8 ha as part of the ongoing design of the project. The majority of the ancillary features such as processing and staff amenities have been located in areas of degraded or regrowth vegetation in the previously disturbed eastern portion of the site, helping to avoid impacts to the higher vegetation integrity plant communities and habitat resources in the study area. Areas of threatened ecological communities were primarily avoided with the exception of disturbance of a 0.14 ha patch of poor condition Box-gum woodland located immediately

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	– Preparation and implementation of a construction environmental management plan. – Preparation and implementation of an operation environmental management plan. to demonstrate what measures have been or will be put in place for the listed outcomes to occur. Currently these are listed as being addressed by contractors in separate reports instead of having details provided in the BDAR.	adjacent to the Hume Highway required to be disturbed to facilitate the construction of a new acceleration lane. A buffer has also been maintained to Narambulla Creek. The preparation and implementation of the Construction Environmental Management Plan (CEMP) is mentioned, along with a range of detailed controls to be included in the CEMP, are outlined in Section 8.6 of the BDAR.
	Prescribed impacts assessment lacks details The prescribed impacts assessment does not adequately address the likely impacts from the project. The impacts from the loss of habitat connectivity and vehicle strikes should be addressed in further detail including mitigation measures. Proposed speed limits for internal roads should be included in this section. Mitigation measures to reduce impacts to habitat connectivity and vehicle strike should include – Reduced speed limits – Overpasses/rope crossings, underpasses, glider poles – Wildlife fencing to guide wildlife towards safe crossings/restrict entry into unsafe areas. Koalas are mentioned in this section however the assessment requires more detail outlining the risks and the impacts that may arise to the koala as a result of the increase in truck movements. More detail should be provided on the risks to this species and the specific mitigation measures that will be undertaken to reduce the impacts.	Habitat connectivity is assessed in Section 8.3.1 and vehicle strikes are assessed in Section 8.3.3 of the BDAR and BCO 17 in Table 8.6 of the BDAR states: <i>Signposting and enforcement of appropriate speed limits along the proposed access road to reduce the likelihood of vehicle strike and mortality of native fauna.</i> It is noted that the length of haul road passing through native vegetation outside the operational area of the site is limited to approximately 550 metres and Global Quarries will install a speed limit of 40 km/hr for all vehicles travelling within the site. The use of the internal haul road is unlikely to result in any impacts to fauna given the short distances, vehicles will be driving at slow speeds and daytime operations and further mitigation is not considered warranted. However, further detail on the proposed mitigation measures will be discussed with DPHI and CPHR during the preparation of the Biodiversity Management Plan prior to construction.
	Land Zoning The proposed development does not align with the current zoning of the land (C3 Environmental Management) The development is proposed to take place on land zoned C3 Environmental Management. The proposed development does not align with the objectives of the zone – To protect, manage and restore areas with special ecological, scientific, cultural or aesthetic values. – To provide for a limited range of development that does not have an adverse effect on those values.	The project is a permissible development within the C3 Environmental Management zone. Section 2.9(3)(a) of the State Environmental Planning Policy (Resources and Energy) 2021 (Resources and Energy SEPP) states that extractive industry may be carried out on land with development consent on land on which development for the purposes of agriculture may be carried out with or without development consent. Agriculture can be carried out both with and without consent in the C3 Management Zone under the Goulburn Local Environmental Plan 2009 and the project is therefore permissible with consent through the application of Section 2.9(3)(a) of the Resources and Energy SEPP. It is noted that extractive industries comprise a key element of the regional economy and the project will align with key local strategies and plans including the Goulburn Mulwaree Local Strategic Planning Statement, the Goulburn Mulwaree Community Strategic Plan 2042 and the South East and Tablelands Regional Plan as described in Section 2.6 of the EIS.

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	– To facilitate the management of water catchment areas, environmentally sensitive land and areas of high conservation value. Quarrying is not on the list of activities permitted within this zone.	The project is a permissible development and has been designed to minimise the adverse effect on the environmental values of the land including the protection of the most ecologically sensitive areas of the site. The project site forms part of a larger patch of vegetation in the locality interspersed with cleared lands used for agriculture and other developments. The project would remove vegetation along the edge of the South-east and Tablelands Regional Biodiversity Corridor but would not completely sever or isolate any patches of native vegetation and the removal of vegetation would be offset in accordance with rules established by the <i>Biodiversity Conservation Regulation 2017</i>. A vegetated corridor would be maintained to the west of the project site and would provide north-south connectivity through the landscape. Rehabilitation of the site would be undertaken to return the site to close to its existing condition, but it is noted that the vegetation would not provide the same degree of shelter or habitat resources until the canopy trees have matured. The project site is located within Sydney's Drinking Water catchment and a detailed water management system has been developed to ensure the project will have a neutral or beneficial environmental (NorBE) impact on water quality in the catchment.
TfNSW	TfNSW has reviewed the Supplementary Response to Submissions prepared by GHD Pty Ltd (Project No. 2127708, Rev 1) for the proposed Marulan Quarry. The report addresses the responses provided by Government Agency submissions in relation to a previous response to submissions report. TfNSW confirms that the recommendations outlined in its letter dated 18 June 2025, as per Attachment 1, continue to apply and there are no further comments in relation to the submissions report.	As mentioned in the previous response, Global Quarries are committed to meeting the requirements of the conditions.
Australian Government DCCEEW	The Department has reviewed the request for advice and states that nil comment is provided.	Noted
Crown Lands	For the project to proceed on Crown land the proponent must demonstrate compliance with the requirements of the Commonwealth Native Title Act 1993, providing evidence that there is a valid Native Title Future Act pathway available to authorise the proposed activity over the Crown land involved. This is also critical to enable the lawful granting of leases/licences under the Crown Land Management Act 2016 that would be required if the project was to gain approval. At this time, the project is at risk of being approved without a	Global Quarries has received advice from Hetherington Legal who have been assisting with negotiations with Crown Lands throughout the development of the project. Hetherington have advised that an available Native Title Future Act process under the <i>Native Title Act 1993</i> (Cth) (NTA) is to commence proceedings in the Federal Court for a non-claimant application pursuant to Section 61(2) of the NTA, to obtain a protection under Section 24FA to allow a Future Act (being the grant of an extractive licence by Crown Lands) to proceed validly. They also advised that it is practical for the assessment of the SSD Application to proceed, with Native Title matters to be addressed following grant of the DA and prior to

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	Native Title Future Act pathway having been identified that would allow it to proceed.	the grant of a licence by Crown Lands to carry out the authorised development and that this requirement can be secured as a condition of the DA. Based on the above Global Quarries, request the requirement for a licence by Crown land be included as a condition of consent, which will be resolved if the application is approved.