

06 November 2023

Director Resource Assessments
Department of Planning & Environment

Attention: Mr James McDonough
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**SUBJECT: SSD-11591659 Deep Creek Quarry – RFI No.8 SIA Addendum –
DPE ref: RFI 62358457**

Dear James,

I refer to the Department of Planning & Environment's request for additional information on SSD-11591659 dated 19 September 2023 (RFI 62358457) regarding matters raised in relation to the Social Impact Assessment. Our response to these matters are provided below:

1. INTEGRATION OF RESULTS OF ENGAGEMENT PROGRAM

"Further integration of the results of the community engagement program into the assessment of the potential social impacts of the currently proposed project. This should include further analysis and assessment of how people expect to be impacted by the project, focusing on those most impacted. It should include consideration of the perspectives of particular demographic groups and individuals (including the most vulnerable) and how they may experience the identified impacts;"

The local area surrounding the quarry is comprised of relatively small numbers across a broad range demographic groups, from families with school aged children, to couples and individuals of varying age groups who sort a rural setting for retirement, or a "tree change", or have remained in the area given existing family live close. While some operate businesses from the property, others work in the larger regional towns.

Section 7.2 of the Social Impact Assessment provided a categorisation of impacts and how these may affect the various demographics in the area. Appendix A provided a detailed breakdown of the demographics for the local and regional area.

An example of some of the key issues for individuals or demographic groups, the key identified impacts for that demographic and the adaptations in the Quarry Design to minimise impacts are outlined below:

- **Demographic: The Travelling Public, comprised of all demographics, including local residents and those who use The Bucketts Way for travel from Gloucester and surrounds.**
 - Concerns over increased heavy vehicle traffic and its effects on the intersection with the Pacific Highway.

- Ironstone Developments will develop and implement management controls to reduce the effects of increased traffic on The Bucketts Way, including a Driver Code of Conduct and Traffic Management Plan.
- Concerns over the potential negative impacts on the condition of The Bucketts Way, noting some existing sections were considered poor during the consultation and submission period.
 - The Bucketts Way has been identified as a significant rural arterial road and the subject of substantial funding for its improvement in recent years.
 - Substantial portions of The Bucketts Way between the Quarry entrance and the Pacific Highway have been, or are currently being upgraded.
 - Ironstone Developments have committed to paying a levy for the maintenance of the The Bucketts Way for the life of the quarry.
- **Demographic: Families with school aged children:**
 - Concerns about safety of children travelling on buses along The Bucketts Way, particularly in relation to the Limeburners Creek bridge being narrow and increased risk of collision.
 - Limeburners Creek bridge is currently in the process of being replaced, this will result in a wider bridge, consequently reduced perceived risk of collision.
 - The Bucketts Way has been the focus of funding for improvement given its importance as a regional arterial road, this has included improving the general condition of the road.
- **Demographic: Air bnb and farm stay business owners:**
 - Concerned about effect a quarry may have on the perceptions of the area for local tourism and the current and future customers / guests, and effects on flora and wildlife that are in the area:
 - Ironstone Developments has committed to the establishment of large biodiversity stewardship site around the quarry, such that in the local area, while there is a quarry, there is considerably more conservation areas, which will increase conservation for wildlife and flora and should help reduce the potential for negative perceptions of the local area.
 - The quarry location and its design, ensures that aside from the quarry access road entrance at The Bucketts Way, there is no visibility of the quarry from surrounding public roads (i.e. The Bucketts Way, Forest Glen Road, Ebsworth Road or Fords Road).
 - Concerned about noise affecting how customers / guests experience property.
 - Quarry design has retained natural ridgelines that act to reduce noise propagation to prescribed noise levels set by the Noise Policy for Industry aimed at maintaining amenity.
 - The quarry will not operate; after 1pm on Saturdays, on Sundays, or public holidays, where it is likely a higher proportion of guests may be in the area.
- **Demographic: Residents of Forest Glen Road (the area with the highest density of dwellings in close proximity):**
 - Concerns regarding increased traffic and noise on small rural road.

- Access via Forest Glen Road was reviewed as a possible quarry access road but considered high impact to residents with traffic going past numerous properties, the steep hills would also generate more noise travelling up and down.
- Forest Glen Road will only be used briefly during construction and for emergency access.
- Concerns with quarry noise impacts:
 - The quarry extraction area was designed and sequenced to reduce the potential for noise impacts on surrounding properties, particularly those south of the quarry on Forest Glen Road.
 - The use of Deep Creek Road as a haulage option was in part disregarded due to increased potential for noise propagation toward the higher density of dwellings on Forest Glen Road.
- **Demographic: Resident at R5 (32 Deep Creek Road):**
 - Concerns with potential loss of the enjoyment of the natural environment on their property:
 - Initial plans for the quarry looked to access the site along Deep Creek Road (a legal access to the property). Initial consultation with owners of land along the start of Deep Creek Road, who had purchased the land as weekend retreat from their urban home, identified both a potential sensitivity to noise and trucks and the value they placed on the enjoyment of the natural environment present near their dwelling. Given Deep Creek Road dissects their property, and with consideration to the potential change in noise from trucks and potential change in outlook from their dwelling an alternative route was sought.
 - An alternative route was identified, and adopted as the preferred Quarry Access Road that could run directly from The Bucketts Way into the Quarry following the northern property boundary of receptors R4 and R4A. This included development of legal agreements (with property owners), survey and preliminary design of the access road and intersection with The Bucketts Way.
- **Demographic: Residents of R30, their family and neighbouring residents concerned for health and wellbeing of R30:**
 - Residents of R30 moved to the property due to pre-existing medical condition relating to a hyper-sensitivity to diesel fumes. R30 is concerned quarry trucks could significantly affect their health, given when The Bucketts Way is busy, they already notice an effect on health.
 - As noted above the Quarry Access Road was planned to run along the boundary fence (southern boundary of R30) to The Bucketts Way with the intersection on a crest of a hill providing good vision to the north and south and able to operate within the noise, air quality and intersection design constraints.
 - After discussions between an Ironstone Developments representative and residents at R30 about the proposed access road that is located approximately 130 m from their residence, the residents of R30 advised of his health condition and asked if it was possible to move the access road further away across the paddock.

- Ironstone Developments investigated options for a feasible alternative location for the intersection that would meet relevant road standards. A new location was identified for the intersection approximately 170 m further away across the paddock (from R30) to the south.
- Ironstone Developments renegotiated the new access road alignment and intersection location with the property owners. Despite that the new alignment would divide a cattle grazing paddock with the road, they were agreeable as it would improve the situation for their neighbour's health condition.
- The intersection location will also benefit the other neighbours (R31) opposite (at the top of the hill).
- Ironstone's Representative met with Residents at R30 and walked across to the alternative access road alignment which is now approximately 285 m away from their residence, they appeared visibly happier with every step they took further away from their property and stated "this location is 100 percent better".
- In discussions between Ironstone's Representative and Residents of R30, it was asked an earth bund / soil mound approximately 1 to 2 m high on his side of the proposed quarry access road where it runs across the front paddock up the hill and plant shrubs on top of it, to help to minimise the visual impact and reduce airflow potentially containing diesel fumes on his property.
- Ironstone Developments have committed to this bund and shrub planting, and have also offered to plant more shrubs along R30's boundary fence if requested.

2. COMBINED EFFECT OF IMPACTS

"Consideration of the cumulative/combined effect of the identified impacts;"

Consideration of combined cumulative impacts was provide within Section 5.8 of the Response to Submission Report. This is reproduced below.

The impact assessments provided for this quarry have considered the effects of the Project on various aspects of the environment taking into account impacts on local flora and fauna populations and the local community.

Inherent in ecological assessments is the consideration of the cumulative impacts through the State and Federal governments designated conservation status of flora, fauna and ecological communities. This designation is made with consideration of the regional, State and Federal populations and the existing cumulative impacts on this biodiversity. In addition, it is inherent within assessments on local flora and fauna populations to consider whether the project places the local population at risk of extinction. The DCQ project, given the connectivity and extent of the local populations shows there is no risk of local extinction. So cumulatively, assuming the considerations at other quarries are of similar equivalence, the impacts on these same flora and fauna over a more regional area are also unlikely to have a significant impact on the population.

Issue specific cumulative incremental assessments were completed for traffic, air, and noise impact assessments that took into account both the existing baseline conditions and the proposed Hillview

Quarry. Assessments of road safety and traffic impacts were made on key aspects of the traffic route and determined the quarry could proceed. Taking into account the upgrade works currently underway for The Bucketts Way, the safety concerns (and associated cumulative social and economic aspects) are further reduced. In the case of air quality and noise, this considered potentially more elevated baseline conditions (i.e., air quality in the lower Hunter) or possibly higher traffic noise on ambient conditions, however, in doing so it represented a more conservative assessment approach. These assessments determined that taking into account; the baseline, the DCQ and Hillview Quarry, the relevant criteria would not be exceeded. This ensures that residents of the local community are not displaced from their current residence, and potential impacts to community functionality are avoided.

With respect to consideration of Combined Cumulative Impact Assessment, the quarry will result in a net beneficial outcome. It is acknowledged that the quarry will be a change in the current land use, and with that change will be varying levels of impacts. Individually the impact assessments have shown the quarry can be constructed and operated within a manageable level of impact that will not result in the displacement of local residents and has biodiversity impacts that can be fully offset consistent with the NSW Biodiversity Offsets Scheme. The Cost Benefit Analysis determined the project would result in a net benefit, even when taking into account the impacts of the Project. A comprehensive range of mitigation measures have been developed to minimise the impacts of the Project on the environment and community.

In developing the quarry, a unique supply of quarry materials will be available with benefits in making safer roads and reducing heating effects (and resultant climate change consequences) and in doing so, the quarry will deliver local employment and economic benefits to the region and State. With the significant private investment, foresight and lead-time in developing quarry resources, each quarry proposal provides a significant benefit to the community in providing quarry products to satisfy the construction of both private and public infrastructure. When demand outstrips supply, material prices increase, and projects are delayed as existing providers become fully allocated. Where existing suppliers are fully allocated to existing companies or related parties, this can reduce market competition in the construction sector further driving up costs.

Quarrying projects must be sited in locations where suitable natural resources are located, whilst being close to customers using the material (typically urban areas) to avoid excessive haulage costs. All quarries involve the clearing of vegetation, excavation of material and haulage to customers. Taking this into account, and with consideration of the cumulative impacts, the DCQ Project is located in a suitable location that will avoid significant impacts to the community, is located near main arterial roads, has developed measures to manage and mitigate impacts and will provide a needed quarry material.

3. SOCIAL IMPACT MITIGATION MEASURES

“Further consideration of tangible, deliverable and enduring social impact mitigation measures that respond directly to the identified social impacts (refer to Table 1 in the Department’s Social Impact Management Toolbox (February 2023) for further guidance in this regard)”

Table 9 of the Social Impact Assessment (SIA) (Appendix S of the EIS, prepared by Mara Consulting 2021), provides a summary of identified impacts and mitigation measures proposed that is generally consistent with Table 1 of the Department’s Social Impact Management Toolbox (February 2023) guidelines. Ironstone Developments will develop and implement a Social Impact Management Plan

(SIMP) for the DCQ that will include all relevant measures and controls, to be approved by the Planning Secretary.

Section 1 of this letter provides a summary of the measures developed to minimise the impact of the DCQ on individuals and the community. Items such as the relocation of the access road and construction of a bund and landscaping to reduce impacts on R30 are an example of a tangible measure proposed to reduce potential social impacts. While the proposed DCQ has been designed and mitigation measures developed to minimise impacts to community, Ironstone Developments recognise that the proposed quarry is a new development in the area that will have some impact on community. As such, Ironstone Developments are proposing to fund and facilitate (through the Community Consultative Committee - CCC) a Community Development Fund (CDF). The CDF is consistent with a suggestion by the Mid Coast Council Community Development Officer as identified during consultation in the SIA.

3.1 Community Development Fund

The CDF would be funded through a levy on each tonne of product sold from the quarry to a maximum annual commitment of \$50,000 (i.e. if 500,000 tonnes is sold, \$50,000 goes into the CDF). This maintains some nexus between the scale of the potential impacts and funding put back into the community.

The DCQ's CCC will determine where in the community the funds would be spent. While the details of the CDF would be established by the CCC during initial meetings, the following key guiding elements are proposed:

- The CDF will be based on a 10c per tonne (ex GST, indexed with CPI) levy on quarry sales to a maximum of \$50,000 per annum.
- In the first year, Ironstone Developments would ensure a minimum of \$10,000 is available to the CDF.
- Funding would preferably go to supporting the local community, with a higher weighting on areas closer to the quarry (i.e. most affected by the quarry).
- The local community would likely include the area from perhaps Stroud to Limeburners Creek and west to Clarence Town, but need not be limited to that area.
- Requests for funding would be made and submitted to the CCC (who meet quarterly) with grants approved and paid following each CCC meeting or sooner if exceptional circumstances apply.
- Funding may be used for one off events, infrastructure, sporting teams, support of organisations or other services.
- In determining funding requests, the CCC must take into consideration how the funding will provide "*tangible, deliverable and enduring value*" to the local community.
- The Deep Creek Quarry website would display the total contributions to the CDF, value and details of the grants issued and the residual balance of the CDF, with updates to the page on a six-monthly basis.

4. CONCLUSION

We trust the above adequately addresses the request for information, please contact the undersigned should clarification be required.

Yours Sincerely

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