

10 December 2019

Department of Planning, Industry and Environment

Dear Sir/Madam,

Re: Sancrox Quarry Expansion Project

We have recently purchased subdivision blocks at 37 and 38 Orontes Close in the Sancrox Industrial Precinct. These blocks are within 250 metres of the proposed Sancrox Quarry Expansion Project. We are currently undertaking capital works on the blocks with expected completion in March 2020. This will be the home for our Civil Construction business, which will include a workshop and head office. The capital investment will be in the vicinity of \$3.5 million.

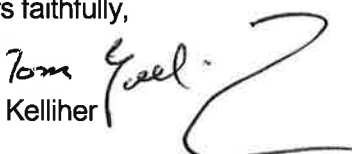
At the time of purchase we were fully aware of the location of the Quarry which we expected would not, in its current form have any significant impact on our business. After reviewing the proposed expansion plans we have major concerns that our business will be impacted by noise from drilling and blasting, poor air quality, visibility and the economic impact of having a quarry of this size right beside our new business premises and future development within the area, not alone the impact on the area but in principal will de-value the capital outlay we have invested in our future Head office and work shop location. We believe your intention should have been made public prior to the sub-division been approved for development.

- Noise & Blasting
  - The noise modelling provided does not show any noise level contour diagrams as they affect residential receivers, either with or without mitigation.
  - Again, there are no noise level contours for both daytime and night-time noise levels as they affect residential receivers.
  - The bund walls shown on the plans, to the south of the quarry processing area and to the west of the quarry excavation, appear to ignore the underlying topography.
  - While the length, width and height of the walls is provided, no datum is shown to enable the RL of the top of each wall to be determined.
  - The single line drawing of the quarry processing area does not show any internal roads or RL's to determine the height of this area and that of potential noise generators, to allow any independent assessment of the effectiveness of the walls as a mitigation measure.
  - There is no flyrock assessment within the REF. The only reference to blasting is that "Blasting practices at the quarry are to be undertaken in accordance with Australian Standard AS 2187.2".
  - The proposed quarry does not provide any flyrock buffers. There is ample evidence on the adjoining properties of flyrock from the quarry lying on the surface of the ground.
- Air Quality & Dust

- There is no modelling of air quality for the current and proposed quarries or the mitigated scenario.
  - It is not possible to make an assessment or form a judgement on the impacts of this issue on receivers.
- The documentation has not established appropriate buffers for noise, vibration, dust and flyrock are available within the quarry land.
- Visual Amenity
  - The photographs and visibility model provided in the EIS are not a true reflection on the visibility of the quarry operation. In some case they are not current, in other cases that have been taken from relatively close low elevation positions.
  - No RL's have been provided for the quarry operational areas and the proposed noise and visual screen bund walls. It has not been possible to make a proper assessment of the visual impacts.
- Quarry Closure & Rehabilitation
  - There are no details on how the proposed quarry is to be rehabilitated. From an area of intact native vegetation, to a hole approximately 1km long and 0.5km wide, between 50-90m deep, with virtually no mitigation strategies in place to address the environmental impacts and no rehabilitation plan, it is hard to see how the EIS can be acceptable in its current form.
- Current Operations
  - This quarry has a history of not meeting it's obligations in relation to it's impact upon adjoining properties.
  - None of the quarry boundaries have been provided with safety fencing.
  - The current Environmental Management Plan requires the revegetation around the boundaries which has not happened.
  - The development consent included a condition requiring a Quarry Rehabilitation Plan to be submitted within 6 months of the Consent being issued. There is no evidence that any of this plan, if it exists, has ever been implemented.
  - A poly pipe siphon hose has been placed from one of the quarry water storage dams across an adjoining owner's property to the south without any form of consent.
  - The quarry was fined in 2015 by the EPA for failing to carry out water sampling required by it's Environment Protection Licence.
  - The quarry's past and current performance does not engender any confidence in it's continuing operation of a larger quarry and it's management.

Eire Constructions Head Office will be the new home to some 20 + office and workshop employees. The expansion the quarry is proposing is significant and we object to the expansion.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tom Kelliher', followed by a large, stylized flourish.

Tom Kelliher