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24 September 2025

Mr Carl Dumpleton  
Department of Planning, Housing and Infrastructure  
**Submitted via the NSW Planning Portal**

Dear Carl

### **Objection to the Monaro Rock Quarry Project proposal - SSD Application SSD-27223807**

We act for Sandra Walsh, the owner of 223A Alderson Place Tralee NSW 2620, which is comprised of a number of lots including Lot 151 in DP754912 (**Lot 151**) her most southernmost paddock.

Our client operates a significant sheep farming enterprise with approximately 700 sheep grazing freely across her land. She has managed this operation solely since 1993.

We are writing on behalf of our client to formally object to the proposed Monaro Rock Quarry Project proposal (SSD-27223807) (**SSD Application**) currently on exhibition on the NSW Planning Portal. Under this proposal, Monaro Rock Pty Ltd (**MRPL**) seeks development consent to establish a new hard rock quarry in Royalla on land located adjacent to the ACT/NSW border, approximately 5km north of the intersection of Monaro Highway and Old Cooma Road (**Project Site**).

#### **1. Introduction**

##### **The Project**

- 1.1 We understand from the Environmental Impact Statement (**EIS**) prepared by RW Corkery & Co (August 2025) in support of the SSD Application, the target resource is rhyodacite rock located beneath the Project Site. The intention is to extract up to 1,000,000 tonnes per annum of hard rock from the resource of approximately 32.4 Million tonnes for up to 35 years, with a further period proposed for site rehabilitation (**Project**).
- 1.2 The Project Site covers an area of approximately 790,000 m<sup>2</sup>, and spans at least 13 different lots, including various Crown paper roads and the corridor of old Goulburn Bombala Railway line. The Quarry itself is mostly proposed on Lot 2 in DP 555380 (**Quarry Site**).
- 1.3 We understand that the Project involves blasting rhyodacite rock, followed by loading and processing it using mobile or fixed plant. While initially processing would occur within the extraction area using mobile equipment, the adjacent land will then progressively be developed into a standalone processing and stockpiling area.
- 1.4 In addition, to access the Project Site, MRPL proposes to construct a dedicated Quarry Access Road to the south-west of the Quarry Site, which includes a crossing over the Goulburn Bombala Rail Line, connecting the Quarry Site to the public road network via a new intersection on Monaro Highway. A secondary unsealed access road for light vehicles would then be created by upgrading an existing farm track in the south-east of the Project Site, connecting to Mates Drive.

## Lot 151

- 1.5 Lot 151 directly abuts the proposed Quarry Site, as well as Lot 302 DP754912 the northernmost lot proposed as part of the Project Site.
- 1.6 Lot 151 is zoned C2 – Environmental Conservation under the *Queanbeyan-Palerang Regional Local Environmental Plan 2022 (QPRLEP)*. This zoning is intended to protect what is considered to be environmentally sensitive land, and in this zone, the permissible uses are limited to low impact activities like bed and breakfast accommodation, environmental facilities, farm stay accommodation, and roads. Other uses, including 'Extractive Industries' are prohibited - except for home businesses and home occupations, which are permitted without consent. The proposed quarry and its associated activities are therefore inconsistent with the zoning and the zoning objectives and is not permitted under the planning controls.

## 2. Grounds of objection

- 2.1 It is our client's submission that for the reasons identified below the Project should be refused.
- 2.2 Fundamentally, while the EIS addresses general land use impacts and proposes mitigation measures, the Project itself is not compatible with rural residential character of the area, which is experiencing population growth and increasing residential development. As mentioned, the Quarry Site immediately adjoins Lot 2, being an Environmental Conservation zone and is a highly sensitive area from an ecological perspective.
- 2.3 The EIS also fails to properly acknowledge and address the fact that there are already four other quarries within a 30 km distance and the cumulative environmental impacts associated with those quarries, including dust, noise and vibration, and water quality.
- 2.4 Instead, the EIS simply asserts that the nearby quarries to the north (Cooma Road Quarry and Mugga (Symonston) Quarry) and that to the south (Williamsdale Quarry) are not close enough to result in discernible cumulative amenity impacts. In our client's experience, however, the combined effects of multiple quarries in close proximity can have significant and lasting impacts on the local environment and community amenity, and these should be properly assessed as part of the approval process.
- 2.5 In addition, MRPL has not adequately address the Secretary Environmental Assessment Requirements that were first issued in September 2021 (and more recently updated in August 2025) (**SEARS**). Nor has MRPL considered the specific risks to livestock, particularly sheep, which are highly sensitive to environmental disturbances, such as those proposed by the Project.
- 2.6 These issues are set out in more detail below.

## Noise and Blasting

- 2.7 Dot point 1 of clause 2, Key Issues in the SEARs required the EIS to address the following matters:
  - 2.7.1 a detailed assessment of the likely construction, operational and offsite transport noise impacts of the development in accordance with the Interim Construction Noise Guideline, NSW Noise Policy for Industry and the NSW Road Noise Policy respectively, and having regard to the Voluntary Land Acquisition and Mitigation Policy;
  - 2.7.2 proposed blasting hours, frequency and methods; and
  - 2.7.3 a detailed assessment of the likely blasting impacts of the development (including ground vibrations, overpressure, flyrock, visual and fumes/ odour) on people,

animals, buildings/structures, infrastructure and significant natural features, having regard to the relevant guidelines.

- 2.8 However, while the EIS includes an assessment of the likely construction, operational and offsite transport noise impacts of the proposed development in accordance with relevant guidelines, it fails to provide sufficient detail regarding proposed blasting hours, frequency or methods.

*Insufficient Information on Blasting Operations*

- 2.9 The EIS and the report prepared by Octave Acoustics Pty Ltd (**N&VI Assessment**) merely suggest that blasting may occur weekly (or more frequently if there are misfires) between the hours of 9:00 am and 5:00 pm Monday to Friday.<sup>1</sup> This could result in up to 52 blasts a year or approximately 1820 blasts over the life of the quarry.
- 2.10 In our client's view, this frequency is excessive and likely to result in significant impacts. If the Project is approved, which our client disagrees with, blasting should be limited to monthly or a longer period, and only at specific times to reduce disruption to surrounding properties, livestock and the community more broadly. Furthermore, advance notice should be provided to neighbouring properties prior to any blasting events.

*Airblast Overpressure and Acoustic Impacts*

- 2.11 The N&VI Assessment also does not adequately address acoustic impacts in a rural setting, particularly those associated with airblast overpressure levels. Although peak pressure levels are reported to comply with relevant criteria, they are in our client's view too close to human comfort thresholds.
- 2.12 In this regard, it was noted that the levels at the R1 receiver (within the Project Site and adjacent to my property ) were calculated at 118 dBL in front of the face, and 109 dBL behind the face, which exceeds the human comfort criteria.<sup>2</sup> It is reasonable to assume that similar levels would be experienced on Lot 2, and raises concerns about the real impacts of blasting on nearby properties.

*Low-Frequency Noise Risks*

- 2.13 The EIS also indicates that MRPL intends to use mobile and fixed processing plants, including crushing, screening, asphalt and concrete production, and recycling. However, while the noise assessment suggests that the operational noise associated with the quarry will comply with standard criteria, it does not assess low-frequency noise—such as deep rumbles from trucks and machinery—which can travel long distances and be more noticeable in rural residential areas.
- 2.14 It is noted that due to limitations in available data (which started at 63 Hz), a risk assessment was conducted using extrapolated data, and that this assessment suggests that under noise-enhancing conditions at night, low-frequency noise may exceed NPfI thresholds, and a correction may be warranted. This suggests that low-frequency noise risk that has not been fully assessed or quantified, and this must be addressed given its potential to impact amenity in rural settings.

*Uncertainty Around Flyrock and Blast Clearance*

- 2.15 The Flyrock report prepared by Fromble Corp Pty Ltd 29 May 2025, is described as a preliminary assessment, on the basis that actual blast parameter details are not yet known.

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<sup>1</sup> Octave Acoustic Report, page 13

<sup>2</sup> Ibid, page 55

DPHI therefore cannot properly assess the impacts of Project on the basis of this information.

- 2.16 The report also states (p.27) that “It is common for quarry and surface operations to require short clearance of public and private areas.” Lot 151 is a private area that borders the Quarry Site and is specifically noted in that report as one that should be specifically ‘checked prior to firing a blast’, and one that should be investigated in terms of the use of drones and the development of clearance protocols with the landholder.
- 2.17 We are instructed that our client has not been contacted by MRPL regarding this issue or the potential impacts on her property about this issue. Further, our client does not consent to the proponent entering her property for the purposes of their blasting activities.
- 2.18 In any event, this is clearly indicative of the unacceptability of the Project in this location and its incompatibility with rural residential and farming properties such as Lot 151.

#### *Impacts on Animals*

- 2.19 There has also been no assessment of the noise and blasting impacts on animals. In my view, the proposed operations at the quarry are likely to startle and stress livestock, particularly those that may graze near the quarry boundary. Chronic exposure to noise and blasting, may lead to issues such behavioural changes in the animals, reduced productivity and compromised animal welfare – and impacts which have not been considered or assessed as part of MRPL’s assessment.

#### **Traffic impacts and vehicle movements**

- 2.20 The proposal also includes a significant increase in vehicle movements, including 400 road truck movements per day, 100 concrete agitator truck movements per day and up 40 light vehicle movements per day (related to staff use).
- 2.21 While the EIS and the Road Transport Assessment prepared by Transport Planning Partnership Pty Ltd suggest (23 May 2025) suggest that the Project would not have any unacceptable impacts on the road network, on the basis that it would utilise existing approved heavy vehicle routes and not affect road safety, it is difficult to reconcile this conclusion with the reality of such a substantial increase in traffic within a rural residential setting.

#### **Air Quality and Greenhouse Gas Emissions**

- 2.22 Dot point 2 of clause 2 of the Key Issues section of the SEARs requires the EIS to address the following matters in respect of Air Quality:
  - 2.22.1 a detailed assessment of potential construction and operational air quality impacts, in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, with a focus on dust emissions including PM2.5 and PM10, and having regard to the Voluntary Land Acquisition and Mitigation Policy;
  - 2.22.2 a greenhouse gas assessment of the operation of the development having regard to any applicable State or national policies, programs or guidelines.
- 2.23 The air quality assessment prepared by Northstar Air Quality Pty Ltd (4 August 2025) concludes that the Project is not expected to result in unacceptable impacts to surrounding sensitive receptors, as it would comply with the air quality criteria for particulate matter, odour and respirable crystalline silica (RCS). However, this conclusion is contingent on MRPL’s effective implementation of a range of mitigation and monitoring measures, including an Air Quality Management System, real-time monitoring, dust suppression and staff training.

- 2.24 In addition, the Human Health Risk Assessment by Enriska (5 August 2025), concluded that potential health risks associated with RCS for nearby rural and residential properties, based on the air quality modelling by Northstar (2025 would comply with relevant national health-based guidelines for both particulate matter and RCS).
- 2.25 Despite these findings, our client remains concerned about the potential dust and RCS impacts, particularly the health risks to both residents and livestock if airborne particulates are not properly controlled, and MRPL's ability to consistently implement and maintain the required mitigation measures over the life of the project.
- 2.26 Of particular concern is the severe windy nature of the area – this wind can be a southerly and/or westerly, which increases the risk that dust generated from crushing and haulage activities will settle on grazing land, potentially affecting pasture quality and leading to respiratory issues in livestock. There has been no assessment of the potential for RCS exposure in livestock or the long-term impacts on animal health.
- 2.27 Given that our client runs a significant sheep farming operation nearby and including on Lot 151, it is concerning that the EIS has not assessed the air quality impacts on livestock. Our client is also highly sceptical about MRPL's ability to meet ongoing dust suppression requirements, especially as the EIS indicates that at least 25 ML of water per year will be needed for dust suppression—a substantial and ongoing water demand.
- 2.28 Regarding greenhouse gas emissions, the EIS states that the Project's direct emissions are likely to be approximately 19,531 t CO<sub>2</sub>-e per annum. This is a significant impact that is not meaningfully addressed in the EIS or supporting material, other than a general commitment by MRPL to investigate ways to minimise emissions.
- 2.29 These impacts again demonstrate the unacceptability of the Project.

## Water

- 2.30 Dot point 3 of clause 2 of the Key Issues section of the SEARs requires the EIS to relevantly address the following matters in respect of water:
  - 2.30.1 detailed site water balances for the dry, average and wet rainfall years, including a description of site water demands, water disposal methods (inclusive of volume and frequency of any water discharges) for all scenarios, water supply infrastructure and water storage structures;
  - 2.30.2 identification of any licensing requirements or other approvals under the Water Act 1912 and/or *Water Management Act 2000*;
  - 2.30.3 demonstration that water for the development can be obtained from an appropriately authorised and reliable supply in accordance with the operating rules of any relevant Water Sharing Plan (**WSP**);
  - 2.30.4 a description of the measures proposed to ensure the development can operate in accordance with the requirements of any relevant WSP or water source embargo;
  - 2.30.5 an assessment of any likely flooding impacts of the development;
  - 2.30.6 an assessment of the likely impacts on the quality and quantity of existing surface and groundwater resources, including a detailed assessment of proposed water discharge quantities and quality against receiving water quality, flow objectives and sensitive downstream receiving environments;

- 2.30.7 an assessment of the likely impacts of the development on aquifers, watercourses, riparian land, water-related infrastructure, and other water users in particular for domestic and commercial purposes; and
- 2.30.8 a detailed description of the proposed water management system (including sewage), water monitoring program and other measures to mitigate surface and groundwater impacts.
- 2.31 Despite these requirements, neither the EIS, nor the Surface Water Management Report prepared Strategic Environmental and Engineering Consulting (8 August 2025) (**SEEC Report**) or the Groundwater Impact Assessment prepared by Hydrogeologist.com.au (2 June 2025) (**Hydrology Report**) adequately address these matters.
- 2.32 MRPL estimates the quarry's annual water demand at 42.4 ML (including 25 ML for dust suppression, 9 ML for concrete production, and additional water lost to infiltration and evaporation). This demand is proposed to be met by rainfall and runoff captured on site via new water management infrastructure (clean water dams, sediment basins, diversion bunds, drains, water tanks, and a production bore), supplemented by groundwater extraction.
- 2.33 The Project is located within the Murrumbidgee catchment above Burrinjuck Dam Extraction Management Unit (Murrumbidgee II Water Source) under the *Water Sharing Plan for the Murrumbidgee Unregulated River Water Sources 2012*. The SEEC report claims that MRPL is entitled to capture and store water under harvestable rights and intends to use both existing and new dams for this purpose. It also suggests that, provided the water management system is implemented, the Project would not significantly impact downstream water quality or flow regimes.
- 2.34 However, this assessment does not adequately consider:
  - 2.34.1 the impacts on downstream licensed water users, or how capturing rainfall runoff may affect flows into catchments and rivers;
  - 2.34.2 the reliability of water supply during dry years, when the project would rely heavily on groundwater (with an estimated total take of 916 ML over the project's lifetime);
  - 2.34.3 how water supply for dust suppression will be prioritised and reliably maintained, as no specific details are provided.
- 2.35 In addition, while the Hydrology Report's groundwater modelling suggests no impact on surface drainage or sensitive environmental features, it does identify several nearby bores that may experience aquifer drawdown exceeding the NSW Aquifer Interference Policy's Minimal Impact Considerations. This issue is not adequately addressed, with MRPL simply proposing to monitor and "make good" if impacts occur.
- 2.36 It is also noted that the SEARs require identification of all necessary licences and approvals, demonstration of a reliable and authorised water supply, and assessment of flooding impacts. However, the EIS does not provide any clear information about the licences and approvals MRPL intends to obtain, nor does it explain how MRPL proposes to acquire the water entitlements required to support the ongoing operations of the quarry.
- 2.37 Furthermore, the EIS does not guarantee that quarry operations will not adversely affect groundwater or surface water used by neighbouring properties. There is also no commitment to regular water quality testing or contingency plans for remediation if operations or dust impact groundwater.
- 2.38 It has not been clearly demonstrated where the required water entitlements will be sourced from. Further, our client is deeply concerned that any proposed quarry operations will negatively affect the water resources used by neighbouring landholders. On this basis, it is again our client's submission that the Project must be refused.

- 2.39 However, if approval was to be granted, it is imperative that regular water monitoring quality testing and robust contingency plans for remediation must be implemented as conditions of any development consent and that these measures be carefully monitored for compliance.

### **Visual impacts**

- 2.40 With respect to visual impacts, the SEARs required that the EIS include an assessment of the likely visual impacts of the Project (before, during and post-operations) on private landowners in the vicinity of the Project and key vantage points in the public domain, paying particular attention to any new landforms.
- 2.41 Neither the EIS nor the Visual Impact Assessment prepared by RW Corkery & Co (August 2025) adequately address this requirement. While the EIS and supporting reports suggests that visual impacts would be low to moderate depending on location and elevation, and that long term impacts would be limited provided mitigation measures (visibility barrier, fencing along the Quarry Access Road and tree screening areas) are established and successful, it has not been demonstrated that these measures would achieve their intended objectives.
- 2.42 It is difficult to accept that a project of this scale which introduces a significant new landform and industrial infrastructure on land that directly abuts our client's property, would not result in a substantial visual impact. This raises serious questions about the adequacy of the visual impact assessment, particularly in relation to private landowners most directly affected.
- 2.43 Further, we are instructed that our client has not been consulted about the visual impacts on her property, which shares a boundary with the Quarry Site. There is no proposed screening or fencing along this boundary, and no evidence that the visual impacts on Lot 151 have been properly assessed or considered.

### **Crown paper roads**

- 2.44 There are a number of crown paper roads on our client's property. For the avoidance of doubt, our client does not authorise the use of any crown paper roads on her property, and no consent has been sought or obtained from my clients for the use of her crown paper roads for this Project.

## **3. Conclusion**

- 3.1 The Application in its current form is unacceptable and should not be supported. As stated in this submission, our client objects to the Project as it will cause unreasonable noise, air quality, water, and visual amenity impacts—not only to her land being within an environmental conservation zone, but also to the surrounding community. The Project is wholly incompatible with its surroundings and the local area.
- 3.2 As demonstrated in this submission, the potential impacts on livestock, water resources, air quality, and rural amenity have not been properly assessed or mitigated. The EIS and reports submitted in support have not met the requirements specified in the SEARs, with many of the assessments indicating that MRPL needing to do further work and consult with surrounding properties.
- 3.3 In addition, the discussion in the EIS around social impacts is selective and clearly inadequate and it is evident that appropriate community consultation has not been undertaken. As a directly affected landholder whose property abuts the Quarry Site, our client has not received any communication from MRPL, nor has she been consulted regarding the visual, environmental or operational of the Project. For a proposal of this scale and proximity, such an omission is inexplicable.
- 3.4 As outlined throughout this submission, the sheep farming operation our client runs on the land adjacent to the proposed Quarry Site is a vital agricultural enterprise and must be

3.5 If the Project is to be approved however, it must be subject to strict and enforceable conditions, including for example:

- 3.5.1 guarantees that quarry operations will not adversely affect groundwater or surface water relied upon by neighbouring properties;
- 3.5.2 that require regular water and air quality monitoring;
- 3.5.3 robust contingency plans so MRPL is required to remediate any issues that arise in respect of impacts on livestock, water resources, air quality, and rural amenity;
- 3.5.4 a requirement that MRPL engage in meaningful discussions with affected landowners;
- 3.5.5 limitations on blasting frequency as well as timing; and
- 3.5.6 visual screening and fencing should be installed and maintained along all affected property boundaries, including in respect of Lot 151.

Yours sincerely



Breellen Warry  
Partner