

Minnamurra Progress Association Inc.

President: Cliff Mason

Treasurer/Public Officer: Aapo Skorulis

21 May 2019

The Director
NSW Department of Planning and Industry
Sydney

Dear Sir,

Re: Dunmore Lakes Sand Extraction Project – Modification 2 of DA 195-8-2004

The Minnamurra Progress Association Inc (MPA) has resolved to object strongly to the proposed MOD 2 extension of sand mining at Dunmore.

In lodging this objection, the Association acknowledges the openness and willingness of Boral Limited to provide full access to their plans, studies and information pertaining to the proposal, and also acknowledges the support of Boral's proposal by a local Minnamurra resident, Selwyn Holland who has been a community representative on Boral's Community Consultative Committee for a number of years. It should be noted that Mr Holland was a representative on this Committee in his own right and was not formally representing MPA, although he is a member of our Association.

However, the MPA has also sought advice from a number of other long-term members and residents some of whom have scientific experience and is also guided by a submission from Kiama Municipal Council who has shared responsibility for the Minnamurra River Catchment Area. As a result, the Association retains serious concerns about the possible impact of this development on the flora & fauna of the area, and the Minnamurra River in particular, and is also concerned about noise and dust pollution to the residents of The Village (off Riverside Drive) and increased heavy vehicle traffic on Riverside Drive that will be servicing Areas 5A & 5B over an extended period, where Riverside Drive is the principle means of access to Minnamurra township.

Impact on Flora & Fauna

By Boral's own figures (Ecology Table 3 Vegetation Zones), about 56% of Area 5B is made up of Bangalay Sand Forest vegetation that is classified to be in either Moderate or Good condition and it is proposed to remove completely 4.53 hectares of this ecologically endangered forest. This Bangalay Sand Forest consists of native Old-Oman Banksias and the 3.11ha classified as "in Moderate condition"

contains eight (8) hollow bearing trees which provide existing or potential homes to native wildlife and birds.

In addition, the SE extremity of Area 5B (within the best section of the Bangalay Sand Forest) is within about 50 metres of a very large and active White-bellied Sea Eagle nest atop one of the tallest trees in the area (refer Table 7.3 of the proposal). The noise of topsoil removal, ongoing dredging and vehicle movement in such close proximity will I'm sure drive the protected Sea Eagle pair away from the area, and they have been a very important feature of the Minnamurra River Estuary. I have personally observed their nest when I visited with a bird watching group and need to be convinced that their tree will not be removed or disturbed.

Groundwater and Surface Hydrology

Both areas lie within about 50 metres of the Coastal Wetlands Proximity Area, and in fact, Area 5B extends into the Proximity Area with about 1/3rd of the area lying within this zone. Area 5B is surrounded on nearly three sides by the Coastal Wetland protected area containing mangrove forests and tidal areas of the Minnamurra River. The Association is not convinced that proposed barriers surrounding the dredging ponds will be adequate to protect these mangrove areas and the river from inundation during a very high rainfall and flooding event.

In its natural state, the underlying sand body (which is to be extracted) acts as a sponge and absorbs a significant volume of rainwater before there is any runoff thus helping to minimise and delay any flooding. With the already large amounts of sand removed from Stages 1 to 4 of Dunmore Quarry and the proposed removal of another 1,357,000 tonnes of sand (up to 27m deep in places) in Areas 5A & 5B, the whole surrounding area of Rocklow Creek and this meandering section of Minnamurra River will have lost a high proportion of its naturally absorbing sand area and will be rendered more prone to surface runoff and flooding in extreme rainfall periods.

The problem may be compounded by the proposed in-filling of Area 5A (after dredging) with imported Virgin Excavated Natural Mineral (VENM) soil, the permeability of which is not specified. This in-fill soil could also contain acid sulphate soils unless serious testing is required as part of any approval.

Boral's proposal also talks about the dredge material being pumped to the existing processing area in Stage 2 which is a very long distance, and opens up the possibility of accidental leakage, spillage and disruption in the areas between both

sites. There is also concern from some members about leaching already occurring from the sand mining into the river, without any further extension.

Noise and Dust Concerns

Riverside Drive is the only access road from the north to Minnamurra village and according to the development proposal, it will be used by heavy trucks to deliver 325,000 tonnes pa of VENM to construct flood protection bunding in both areas, to re-fill Area 5A and to stabilise the edges of Area 5B pondage during dredging. These areas are much closer to The Village than the other Dunmore operations and the disruption to traffic and truck noise could be a very real problem for Minnamurra residents.

There has also been increased dust pollution over Minnamurra in the last 12 months, and this will only get worse from operational traffic on the proposed un-sealed access roads to be constructed within Areas 5A & 5B.

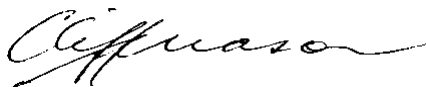
Biodiversity Offsets and on-going monitoring

The Minnamurra Progress Association strongly supports Kiama Municipal Councils recommendations that in the unfortunate event this DA is approved, it contains conditions requiring Boral (and the State Government) to:

1. Establish a new Biodiversity Stewardship Site located in the Minnamurra River catchment area to restore degraded areas and improve and maintain the local biodiversity, and
2. That the NSW Government be requested as a royalty payment provide annual funding for the implementation of projects as identified in the Minnamurra River Coastal Zone Estuary Management Plan.
3. Expand the existing Community Consultative Committee to include an elected and staff member of Kiama Municipal Council.

We ask the Department of Planning and Industry to consider very carefully this development proposal and to stop or modify it to ensure that the concerns raised above will not cause serious harm to the Minnamurra River Estuary, flora and fauna in the area or noise and dust pollution to local residents.

Yours faithfully,



President

CC: Mr Gareth Ward MP, Minister for Family, Community & Disabled Services

Councillor Mark Honey, Mayor Kiama Council

Mr Kerrie McMurray, General Manager Kiama Council

General Manager, Shellharbour City Council

Selwyn Holland, Minnamurra representative to Boral Consultative C'tee