

OBJECTION

Proposed Modification 1 – (Schedule 2, Condition 9) Weighbridge and Scales Fitted to Front End Loaders

Original conditions of consent have already been modified (29/10/13 Modification 1) to accommodate the delay of weighbridge installation by 2 years (in addition to the original condition which delayed weighbridge installation until more than 100,000 tonnes per calendar year). The Dept has granted ample and generous time frame for the proponent to honour this condition.

The proponent claims he “*does not wish to install a weighbridge*” because of the “*significant expense*” .

Collating bucket weight information from multiple loaders, doing a variety of daily activities other than loading trucks including moving material onsite, loading onsite plant and stockpiling is completely unreliable. Of course the proponent “*does not wish to install a weighbridge*”, deleting this condition would not only save the cost of installing a weighbridge but also provides the potential to lose count of bucket loads for road funding responsibility and production data reporting. A single weighbridge recording extracted material leaving the site is the most accurate and fair method to record production ensuring contributions to road maintenance is correct.

The proponent claims the location for the weighbridge “*will change as the development progresses*”.

Laden trucks have only one route out of the site. The quarry’s single access road is a suitable and logical position for a weighbridge to collate all extracted material leaving the site during any stage of the development. Therefore, relocating a weighbridge would not be necessary as claimed by the proponent.

The proponent claims that bucket scales use is effective and accepted. I agree bucket scales are effective as an indicator for truck loading and small scale sales and reporting calculation. Bucket scales are not appropriate in large scale production.

The proponent states that limiting a non-weighbridge consent to 100,000tonnes p.a. creates a supply shortage. Complying with the installation of a weighbridge as deemed necessary in the consent conditions will negate the possibility of a supposed “supply shortage”.

Consent conditions were determined after extensive examination by many experts, development applications to multiple government agencies and examination in a court case. These conditions are in place to ensure some protection to the environment and community. Removing conditions because the proponent does not wish to install a weighbridge is unacceptable when local road funding could be compromised and detrimental to many in the community.

Proposed modification 2 – (Schedule 2, Condition 12) Seal internal haul road

The proponent claims “*it is impractical to seal any road that connects the CEA and SEA*”.

Another condition the proponent is unwilling to honour because of the expense involved. The proponent lists the machinery that will traverse the road so they are well aware of the necessity to ensure engineering plans for road base and sealing is built to withstand quarry vehicle use. Large production quarries require large infrastructure costs and sealing the internal haul road to a suitable standard for quarry traffic is one of those. This condition is in place to provide dust control on what will be a busy haul road connecting extraction and processing areas.

Including a commitment to water the road “*as required*” is completely unacceptable. This commitment has been unsuccessful during the life of the quarry's small operation. Dust currently impacts the neighbourhood, but permitting the quarry operators to determine “*as required*” when production increases to full capacity should not be permitted. The proponent on previous occasions has claimed that watering for dust suppression can undermine the road surface. This makes evident the lack of desire to water the road surface. It would be highly unlikely there would be a dedicated water truck driver, another disincentive for the quarry operators to water the road would be having to stop an employee engaged in productive activities to tend to dust suppression.

“*As required*” is a poor inclusion. It is too subjective, relying on an opinion with no clear indication for either operator or neighbourhood resulting in ongoing dispute for which the Dept is responsible. Consent condition to seal the internal haul road must not be amended. To replace the condition with a watering option, without a definable trigger mechanism, or consequences is poor planning.

Proposed modification 1 – (Schedule 3, Condition 26) wording relating to weighbridge

A weighbridge for a large scale quarry operation is necessary to ensure fairness and accuracy. Removal of this consent condition would likely be detrimental to government agencies, road maintenance and the community.

I reiterate, quarry infrastructure is a necessary expense and a part of the very extensively examined operation requirements previously identified in the consent conditions. The proponent claims he “*does not wish to install a weighbridge*” because of the “*significant expense*”.

Proposed modification 3 – (Schedule 3, Condition 40 & Fig 9 in Appendix 6)

The area of vegetation north of the access road from must be protected. The option requested by the proponents would provide the operators an opportunity to remove the plantings as desired once their obligation to ensure they are planted, watered, fertilised etc is fulfilled. I am unaware of any condition that specifies the visual landscape plantings cannot be removed.

RCS Group Plan dated 17/2/16 shows what appears to be a body of water encroaching into an area of Protected Revegetation Area (Area 2). Also encroaching into the 50m buffer area near Area 1 is an access road and other earthworks. These appear to contravene the Director General's directions now that boundaries that have been “surveyed and ground truthed”.

Proposed modification 4 – (Schedule 5, Condition 6) Community Consultative Committee

The Director-General has provided a clear instruction that relates to mining projects. Community Consultative Committee must be operated in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects (DOP, 2007) or its latest version. I would understand this to be a legal requirement. It is imperative that this condition remain fully intact so the community can have access to a more impartial hearing than is offered by the quarry operators complaints procedure. Perhaps the Dept can re-visit the letter of resignation to the Dept. of Planning from a previous community member to the CCC . This Committee and condition should not be reduced from it's current form.

The Department and other relevant agencies are responsible for ensuring that the proponent complies with this approval. We rely on diligence by these departments to ensure the consent conditions are not watered down to suit the proponents whims.

Please withhold my personal details from publication and from the proponent.