

Monday 8<sup>th</sup> March 2021

Director  
Energy and Resource Assessments  
Department of Planning, Industry and Environment  
Locked Bag 5022  
PARAMATTA, NSW 2124

**RE: Dubbo Quarry Continuation Project (SSD 10417) Notice of Exhibition – Submission Letter**

Regional Group provides the following submission letter to the Dubbo Quarry Continuation Project known as State Significant Development Application number: SSD 10417. The matters of concern are detailed as follows and should be considered as any lesser consideration could compromise Regional Groups ability to accurately manage and report cumulative quarrying activity:

Cumulative Impact

It is acknowledged that the quarry does not propose to exceed its current extraction rate though seeks to expand the extraction footprint to the south and north west of the existing quarry boundary. Specifically, the western extraction area (WEA) is proposed to be approximately 300m from residential land as contained within Lot 2 DP 880413 to the west an extraction face that would be closer to the future residential Southlakes Estate than that consented to for Regional Group's South Keswick Quarry.

During the JRPP's assessment for the South Keswick Quarry the assessment required and considered detailed cumulative analysis of environmental impacts from all quarry operations upon the existing and future residential land with subsequent ongoing management and reporting of quarry operations to ensure cumulative impacts are consistent with that approved by the JRPP.

It is noted that the land to the west has recently been rezoned from R5 – large lot residential to R2 – low density residential with respective amendments to minimum subdivision lot sizes.

The EIS states that the development is compatible with adjacent land uses and that the site is sufficiently distanced from dense residential areas. These statements are not concurred with as the supporting EIS incorrectly describes the surrounding land use zones, its density and location of future residential development which has a resultant impact upon all supporting reports as their assumptions are not comprehensive or consistent with those provided in support of Regional Groups South Keswick Quarry, furthermore this complicates and confuses whether the cumulative impact assessment of quarry operations has been accurately assessed and in this respect we provide the following peer review of acoustic and traffic impact assessment reports.

It is recommended that the proposed expansion of the quarry, modelling and assessment reports require revisitation as this proposal brings into contention, clause 12 of the SEPP (Mining, Petroleum Production and Extractive Industry) (Mining SEPP) which seeks for the compatibility of the development to be considered against the approved uses of land in the vicinity. Specifically, it is requested that the current zoning and ultimate development of the residential land surrounding the quarry be more carefully addressed under the EIS for this proposal.

## Environmental & Amenity Impact

As described above the quarry's building footprint extends significantly closer to residential land. Aside from cumulative impacts of the proposal been appropriately considered and assessed the proposals Noise and Vibration Assessment Report and Traffic Impact Assessment Report have been peer reviewed by Muller Acoustic Consulting and Cardno Engineering and the following conclusions are made:

### Noise and Vibration Impact Assessment Review

The key findings of Muller Acoustic Consulting peer review are summarised as follows:

- The NVIA has not assessed quarry noise emissions and road traffic noise at all residential receivers within the potentially affected area of the quarry extension including the potential future residential receivers in the Sheraton Road Estate and the Southlakes Estate.
- Application of the rural receiver category for R18, R19 and R23 may provide a more appropriate representation of the acoustic environment of these residential receivers and associated Amenity Noise Levels.
- Background noise levels used in the assessment are from May 2016. Use of contemporary data may result in similar Rating Background Levels (RBL), but would alleviate any concerns around changes in ambient and background noise levels that may have occurred from recent industrial developments in the area.
- The meteorological conditions used for noise modelling do not align with the NPI noise enhancing conditions as stated in the assessment methodology. It is anticipated that noise levels will be higher than those presented in the NVIA when the NPI noise enhancing conditions are applied.
- Clarification is sought as to why future Year 1, Year 3 and Year 21 stages of the quarry development were chosen and why more stages between Year 3 and Year 21 were not modelled.
- Clarification is required for the operational scenarios modelled, describing the plant and equipment in use during the daytime and night time including their locations.
- Production of noise contour diagrams for five yearly stages for quarry operations, stripping and drilling would allow for a more transparent understanding of the noise impacts at the potential future residential receiver locations in the Sheraton Road Estate and Southlakes Estate subdivisions.
- Predicted noise levels from normal operations exceed the daytime and night time PNTLs and the recommended ANL of 45dBA for rural receivers for the life of the quarry at R2, R3 and R23. It is anticipated that noise levels would also exceed the daytime and night time PNTLs for the life of the quarry at the proposed dwelling at 25R Sheraton Road and future residential receivers in the Southlakes Estate, situated between R2 and R23.
- Comparison of noise emissions from future operations to existing noise emissions do not justify the impacts presented. Predicted noise levels from the quarry exceed the recommended (Rural) Amenity Noise Level of 45dBA for existing residential receivers

and potential future residential receivers, which may deteriorate acoustic amenity, compromise the compatibility of existing and proposed land uses and potential land use conflicts creating restrictions for further industrial developments in the area.

- Additional noise mitigation measures and level of attenuation achieved should be considered.
- Further clarification is required for the determination of traffic volumes for the relevant assessment periods which may result in exceedances of the Road Noise Policy criteria.

A full copy of the Muller Acoustic Report is attached to this letter for detailed review and assistance.

#### Traffic Impact Assessment Review

The key findings of Cardno Pty Ltd peer review are summarised as follows:

- A lack of reference to previously approved traffic generating developments in the surrounding area, including South Keswick Quarry, and consideration of the combined traffic impact of all traffic generating developments on the surrounding road network, in terms of efficiency, amenity, safety and road pavement life.
- As per Transport for NSW (TfNSW) Restricted Access Vehicle requirements, trucks (larger than and including a 19m B-Double) are prohibited from using Sheraton Road, south of Mitchell Highway, between 8am-9.30am and 2.30pm-4pm on school days.
- Consideration should be given to prohibited hours of travel during school zone periods to be consistent with other quarries in the area as well as de-risking the identified "high" risk location of the non-conforming childrens crossing on Sheraton Road.
- Given the future traffic generation from Southlakes Estate, South Keswick Quarry and Dubbo Quarry, the intersection of Boundary Road and Sheraton Road is a key intersection linking these developments which should be modelled and considered in the TIA.
- South Keswick Quarry approval, the Quarry is required to upgrade pavement conditions along Sheraton Road from Boundary Road to the beginning of the existing four lane carriageway (near to St John's College). It is reasonable to expect that the design requirement (e.g. equivalent standard axle loads) for the pavement life on Sheraton Road be suitable for the South Keswick Quarry, and any increase in design requirements (e.g. additional pavement thickness, subgrade or change in material) to accommodate additional development (e.g. Dubbo Quarry) be accounted for via contributions to the cost of delivery by either Council or the Dubbo Quarry for the difference.
- The report is unclear on details of the largest heavy vehicle, including its type, specific gross vehicle mass and length, and whether future intersections on Sheraton Road at Boundary Road and the new Dubbo Quarry access road will be able to accommodate the maximum size vehicle.

A full copy of Cardno's peer review is attached to this letter for detailed review and assistance.

### Extraction Regime

During the assessment of D16-482 the JRPP required Regional Group to provide an extraction regime that requires extraction processes to head in a western direction first so that extraction in this area is exhausted and any potential conflicts between land uses being further mitigated prior to the adjoining residential area becoming more densely populated. This extraction regime is documented upon the stamped approved plans of D16-482 and informs the extraction regime Regional Groups quarrying activities.

The proposed development does not propose any such extraction regime and as such it is recommended that this be required to be provided, that all extraction within the WEA be exhausted prior to extraction of the SEA so as to be consistent with what has been consented to for quarrying activities in the locality and further mitigating and minimising potential land use conflicts.

I trust that the above will be satisfactorily addressed as part of the assessment process and that Regional Group be involved in any ongoing consultation processes.

Regards,

A handwritten signature in black ink, appearing to read 'R. Tomkins', with a long horizontal line extending to the right.

Richard Tomkins  
General Manager  
Regional Group Australia