

12 January 2022

Submission on behalf of

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I am a current member of the Hanson Bass Point Quarry Community Consultative Committee (CCC) and I represent community concerns in my submission to this amendment.

In this submission I am objecting to the proposed amendment on the basis that the importing of VENM/ENM will create an unwanted dust impact and the construction of the visual amenities will have a minimal benefit to blocking off quarry activities for the wider community.

The Modification request is an outcome from a Development Control Order (the Order) served to Hanson by the Department of Planning, Industry and Environment and dated 4 February 2021. The Order refers to non-compliance with Condition 2 of Schedule 2 of PA 08_0143, that is, the need for development to occur in accordance with the EA for the Project.

My objection to the proposed amendment Mod 3 is based on concerns that the scope of the project does not clearly explain how the proposed amendment relates to the remediation work subject to Development Control Order served to Hanson by the Department of Planning, Industry and Environment and dated 4 February 2021.

The Order refers to non-compliance with Condition 2 of Schedule 2 of PA 08_0143, that is, the need for development to occur in accordance with the EA for the Project.

A further reason for my objection is because the Modification document (Bass Point Quarry Modification 3 PA 08_0143) which is open for public comment does not clearly show where visual amenity construction will occur, other relevant details (location/volume/quantity) regarding the materials to be imported to the quarry are missing from the main document.

The visual amenity barriers for most practical purposes are completed and throughout the construction process to date there was a significant dust impact. Since 2018 to present 17% of complaints recorded in Hanson Bass Point Complaint Register were related to dust complaints.

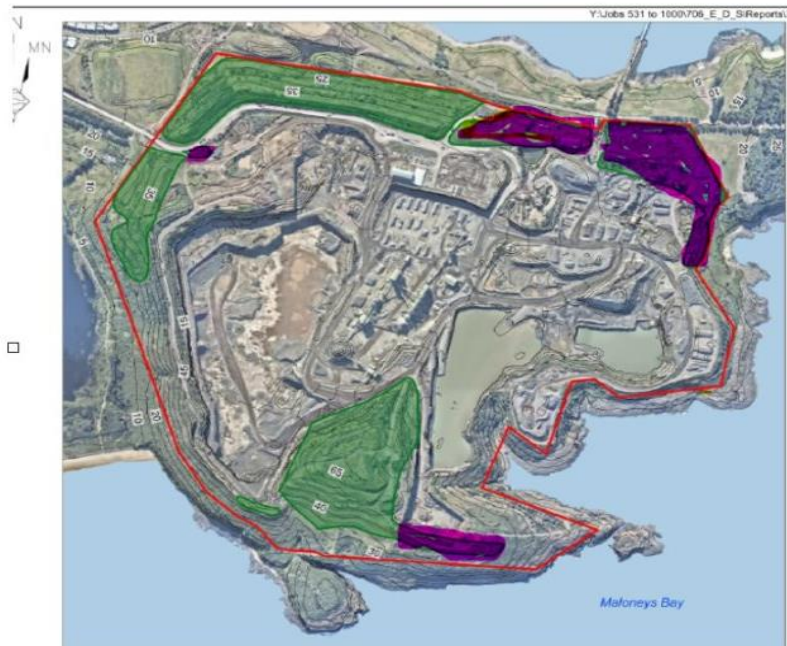
On 6th January 2022 a collaborative discussion with Hanson (Steve Butcher and Chelsea Flood) with myself and other CCC members was held, this discussion also included a tour of the facility to view the locations where visual amenity construction is required.

I have also included 2 draft diagrams showing missing details, for accuracy and clarity these diagrams need to be reviewed and updated by Hanson, I am requesting that relative diagrams to be included in the final version of the modification proposal.

My concerns and requirements of this modification proposal are summarised below.

1. The visual amenities to be modified or constructed are not clearly detailed in the modification proposal. I am requesting the approval document to be revised to include a diagram that clearly shows existing visual amenities vs the proposed visual amenities, the diagram needs to allow the general public to understand the locations where the visual amenities will be constructed or modified. Refer to the attached diagram as an example to clearly show the proposed work of the visual amenities to be constructed.

Showing 4 - Visual Amenities to be constructed



2. For the purpose of the development consent, Hanson propose that no more than 200,000tpa of VENM or ENM material would be imported each calendar year. My first concern on this matter is that the volume of VENM/ENM that is required to construct the required visual amenities has not been identified. Section 2.3.1 Importation Campaigns and Limits of the modification proposal should include an engineering estimate the volume of VENM/ENM required to meet the requirements of the control order.
3. My second concern is that the modification requesting approval to import 200,000tpa per calendar year has no termination date. If the modification is approved then the import of materials in theory could occur for the next 20years or longer.
4. The project should provide an estimate of VENM. ENM volume that will allow the control order to be finalised and based on historical records it should be possible to estimate and include a targeted termination date such that the import of 200,000tpa will be within a defined time frame.

- The materials to be imported are currently stockpiled in an area adjacent to the quarry. For the purpose of clarity, the transport / haul route will be quite direct. The approved document should show the proposed transport / haul route to be used for the relocation of the stockpiled VENM/ENM. As further comment, because the materials will be transported using specific mining haulage trucks with an estimated load capacity of 50 tons, the transport of 200,000 tpa gives an estimated volume at approximately 4,000 trucks per year.

Major VENM/ENM Stockpile and likely Haul Route to quarry.
(Hanson to confirm)



- It is my understanding that the visual amenities will be constructed by Frasers who are managing construction activities at the Shellharbour Marina. I am requesting that the EPA ensure that a timeline for the project to be determined with possible allowances for issues out of control (ie: Covid health order closures). The benefits of a controlled and reduced timeline will be dust generated from the project will have a reduced impact, rather than generating dust over a longer and protracted timeline.
- Historically while the Marina has been under construction the cause of dust impacting the nearby community of Shell Cove has been difficult to isolate as dust has been generated by both quarry activities and by Marina construction activities. With the majority of Marina work completed the modification on the quarry site should hold Hanson responsible for any dust complaints, otherwise it will be impractical to hold either Hanson nor Frasers as the responsible agents for dust control.
- In my opinion the benefits of the control order are not clearly understood and the largest impact of not enforcing the control order would be the management of the stockpiled material from land which is owned by Shellharbour council. Apart from possible impact to the views from the south and the remediation of the visual amenity the visual impacts on the north eastern boundary would have little benefits for the community.
- In this objection to the modification proposal, the EPA must consider if the control order should be revoked or reviewed with the intent to remediate the southern boundary visual amenity.