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Date: 31 August 2018
Ref: 2145_620_002

Paul Thompson
Department for Energy and Mining
GPO Box 320
ADELAIDE SA 5001

Dear Sir,

Re: Extractive Minerals Lease Application (MC4422) – Response to Consultation

Groundwork Plus Pty Ltd (Groundwork Plus) and S.C. Heinrich & Co Pty Ltd have undertaken a review of four (4) public submissions (including one (1) confidential) and one (1) SA Government submission received by the Department for Energy and Mining (DEM) as part of the statutory consultation process which closed on 10 May 2018.

In response to the submissions that were received additional consultation has been undertaken with the following parties;

- Robert Ashby – 15 August 2018 (in person)
- Craig Marlow – 28 August (via phone)
- Regional Council of Goyder - 29 August 2018 (in person)

A summary of the consultation outcomes and responses to each of the submissions received is provided within **Attachment 1 – Response to Public Consultation** and **Attachment 2 – Response to SA Government Consultation**.

We appreciate the opportunity to respond to the submissions received and trust that the responses provided will assist in the review and determination of the Extractive Minerals Lease application.

Yours faithfully,



James Rowe
SA Manager
Groundwork Plus

Cc:
Malcolm Heinrich

Attachment 1

Response to Public Consultation

Name	Topic	Technical Issues Raised in Public Submissions	Feedback / Concerns	Response to Public Concerns
Craig Marlow, Linda Marlow, Monique Marlow, Brandon Marlow	Environment	Economic	Road Degradation - increased traffic will impact quality of roads leading to inconvenience and additional vehicle maintenance.	<p>The operation of the Bluff Road quarry would enable road based materials to be locally sourced and potentially reduce the cost of material supply for local road projects, preventing the requirement for material to be sourced from other quarry's outside of the region and transported along other locations of the unsealed road network. As the operations of the quarry are proposed on a campaign basis, it is not expected that there will be a sustained increase in truck movements along the Bluff Road throughout the year impacting upon the existing quality of the Bluff Road. The operation of the Bluff Road quarry would enable road based materials to be locally sourced and potentially reduce the cost of material supply for local road projects, preventing the requirement for material to be sourced from other quarry's outside of the region and transported along other locations of the unsealed road network. As the operations of the quarry are proposed on a campaign basis, it is not expected that there will be a sustained increase in truck movements along The Bluff Road throughout the year impacting upon the existing quality of the Bluff Road. Discussions between Regional Council of Goyder (Council), S.C Heinrich & Co Pty Ltd and Groundwork Plus Pty Ltd representatives on 29 August 2018 removed the requirement for an independant Traffic Impact Assessment from Goyder Council perspective after the extraction profile (estimate 10kt per annum) was understood by Council representatives. The Council representatives agreed that the operator will not have to "bear all costs" of road maintenance, however, an agreed trigger whereby if a campaign sale opportunity arose >5kt in a short period of timeframe, S.C Heinrich & Co Pty Ltd representatives would contact and update Council representatives of their plans, additionally, photos of the road condition within close proximity to the Site will be taken and sent to Council. S.C Heinrich & Co Pty Ltd agreed to assist Council in maintaining some of the road network by assisting with treatment of water and grading if degradation from a campaign basis is realised. The potential for reducing load limits along The Bluff Road was discussed and Council indicated this action would be highly unlikely to occur. Additionally, the potential for Council to enter into an agreement with associated bank gaurantees was also discussed, this also would be highly unlikely to occur.</p>
		Health	Concerns silica dust can lead to the development of lung cancer, silicosis, kidney disease and chronic pulmonary disease.	<p>As outlined within Section 3.4.1 Modes and Hours of Operation, extraction and crushing operations are proposed to occur on a campaign basis. This is expected to only require crushing to occur for up to four (4) weeks per year limiting the exposure time for any dust that may be generated during the course of crushing. Dust suppression through the use of a water cart and water sprays within the crushing plant will further reduce the generation of dust from the Site. In between campaigns the Site will be managed in a safe and stable manner including the implementation of progressive rehabilitation where practicable to help further reduce the likelihood of dust being generated from Site. In between the resident and the Site is The Bluff Road whereby natural dust generation occurs throughout road use activities especially during dry periods (summer etc).</p>
		Dust	Concerned about dust the impact on their health.	Response outlined above.

Name	Topic	Technical Issues Raised in Public Submissions	Feedback / Concerns	Response to Public Concerns
Robert Ashby	Environment	Dust	Dust generated by increased traffic on local roads. Dust affecting grazing quality and palatability of Marino stud pastures.	As outlined within Section 3.4.1 Modes and Hours of Operation , extraction and crushing operations are proposed to occur on a campaign basis. This is expected to only require crushing for up to four (4) weeks per year limiting the exposure time for any dust that may be generated during the course of crushing. Dust suppression through the use of a water cart and water sprays within the crushing plant will further reduce the generation of dust from the Site. In between campaigns the Site will be managed in a safe and stable manner including the implementation of progressive rehabilitation where practicable to help further reduce the likelihood of dust being generated from Site. Groundwork Plus Pty Ltd representative met with the resident on 15 August to discuss the submission detail, the resident indicated that the family has tried to get The Bluff Road sealed for circa 20 years. This communication was supplied to Council on 29 August and Groundwork Plus requested an update on the road upgrade. Council responded that they are unsure of the potential for sealing The Bluff Road in the short to mid term.
		Water	Concern underground water supplies are inadequate and access to the Booborowie Valley Groundwater should be denied.	Water use for the Site will predominantly be for dust suppression while the quarry is operating. As the operations of the Site will occur on a campaign basis, it is not expected that there will be a requirement for continuous extraction from the existing groundwater well onsite. The Quarry Development Plan designed has remained at least three (3) metres from the calculated groundwater level, pit floor design of 465mAHD negates the requirement to intercept the groundwater aquifer.
			Concerns a dam will be unsuccessful due to insufficient or unreliable runoff and low rainfall amounts.	As outlined in Section 3.9 Water Use , a combination of both surface and groundwater will be utilised for the operation. Surface water will be supplemented by the use of groundwater during dry periods. Discussion with the resident on 15 August indicated that there is potential for extraction of groundwater from well yielded bores within the area.
		Amenity	Visual amenity impact from the south west of Ashby property. Visual amenity photos provided in MLP not truly reflective of actual impact (lessened impact of elevation and surrounding landscapes). Trees are difficult to quickly establish - not suitable screening.	Visual assessment photos were collected from representative locations that could be accessed at the time of the Site inspection utilising a digital camera with a 35mm lens. The formatting of the photo's remains unchanged and they have not been altered in any way for the representation within the report. It is acknowledged that the paddocks located to the south west of the Site may contain views of the quarry pits during development, however, the absence of residential dwellings or public roads located within this land limits the visual amenity exposure to the public. Notwithstanding the limited exposure from this location, the early implementation of tree planting will be undertaken along the southern boundary of the MC to help reduce visual impacts from this location.
		Climate	Climate data taken from Georgetown lacks relevance and rainfall statistics are not accurate.	The Georgetown weather monitoring station has been referenced as the closest representative Bureau of Meteorology (BoM) weather station to the Site providing long term weather statistics for the area. It is noted that there may be additional information available for the Ashrose location, however, these records were not available through the BoM website at the time of writing the report.

Robert Ashby	Transport	Traffic	Sealing The Bluff Road to lower dust impacts of increased and heavy vehicle road use.	As the operations of the quarry are proposed on a campaign basis, it is not expected that there will be a sustained increased in truck movements along The Bluff Road throughout the year impacting upon the existing quality of The Bluff Road. The operation of the Bluff Road quarry would enable road based materials to be locally sourced and potentially reduce the cost of material supply for local road projects, preventing the requirement for material to be sourced from other quarry's outside of the region and transported along other locations of the unsealed road network. As the operations of the quarry are proposed on a campaign basis, it is not expected that there will be a sustained increase in truck movements along The Bluff Road throughout the year impacting upon the existing quality of the Bluff Road. Discussions between Regional Council of Goyder (Council), S.C Heinrich & Co Pty Ltd and Groundwork Plus Pty Ltd representatives on 29 August 2018 removed the requirement for an independant Traffic Impact Assessment from Goyder Council perspective after the extraction profile (estimate 10kt per annum) was understood by Council representatives. The Council representatives agreed that the operator will not have to "bear all costs" of road maintenance, however, an agreed trigger whereby if a campaign sale opportunity arose >5kt in a short period of timeframe, S.C Heinrich & Co Pty Ltd representatives would contact and update Council representatives of their plans, additionally, photos of the road condition within close proximity to the Site will be taken and sent to Council. S.C Heinrich & Co Pty Ltd agreed to assist Council in maintaining some of the road network by assisting with treatment of water and grading if degradation from a campaign basis is realised. The potential for reducing load limits along The Bluff Road was discussed and Council indicated this action would be highly unlikely to occur. Additionally, the potential for Council to enter into an agreement with associated bank gaurantees was also discussed, this also would be highly unlikely to occur.
	Community	Economic	Degradation of productive farming land due to impacts of a quarry (dust etc)	The operation of The Bluff Road quarry would enable construction materials to be locally sourced and reduce the cost of material supply for local road and infrastructure projects, preventing the requirement for material to be sourced from other quarry's outside of the region and transported along other locations of the unsealed road networks. Extraction profile is considered to be of a low profile (10kt per annum) therefore reducing impacts to adjacent receptors. S.C Heinrich & Co Pty Ltd are a formidable respected civil and quarrying company who work throughout the mid north area and have a large market dynamic providing industrial and domestic services to market within the area.
			Markets for product are speculative and not well defined.	
		Consultation	No record of consultation with the following landowners: - Manuel - Humphries - Lines - Yellowie Proprietors	Consultation undertaken at the time of the Site inspection attempted to contact as many of the adjacent landowners as possible. It is noted that some of the adjacent landowners were not able to be contacted during this time, however, due to the low impact and extraction profile throughout the area it is believed that sufficient consultation with receptors has been undertaken and is reflected within the Mining Lease Proposal and development of the Quarry Development Plan. No formal submissions submitted to DEM as a result of lack of consultation by the named landowners.

Name	Topic	Technical Issues Raised in Public Submissions	Feedback / Concerns	Response to Public Concerns
Confidential	Environment	Dust	Dust generated by increased traffic on local roads and impact on others utilising road.	The Bluff Road forms part of the unsealed road network that is managed and maintained by the Regional Council of Goyder. S.C. Henrich & Co Pty Ltd have consulted with the Regional Council of Goyder to raise the community concern of dust being generated from the local unsealed road network. There is no immediate plans to seal The Bluff Road, however, S.C Henrich & Co Pty Ltd have committed to work with Council and provide maintenance assistance of any campaign of increased sales >5kt in volume.
		Dust	Dust affecting adjacent houses with potential impact on: - effectiveness solar panels - quality of rain water - silting up of rain water tanks and filters - laundry	As outlined within Section 3.4.1 Modes and Hours of Operation , extraction and crushing operations are proposed to occur on a campaign basis. This is expected to only require crushing for up to four (4) weeks per year limiting the exposure time for any dust that may be generated during the course of crushing. Dust suppression through the use of a water cart and water sprays within the crushing plant will further reduce the generation of dust from the site. In between campaigns the Site will be managed in a safe and stable manner including the implementation of progressive rehabilitation where practicable to help further reduce the likely hood of dust being generated from Site.
		Health	Health impacts due to potential for respirable silica in dust generated from quarry Site.	Whilst the dolomite resource onsite has the potential to contain free silica, the actual free silica content is likely to be quite variable and unlikely to be present within all dust that may be generated from the Site. The annual production of materials from the quarry will only require crushing to occur for a short duration up to four (4) weeks per year, significantly reducing the exposure of any free silica that may be generated from the operations. The Site is surrounded by an unsealed road network in which generates dust due to road users traversing along The Bluff Road.
		Water	Concern access to groundwater will reduce the amount of available groundwater to other users.	Water use for the Site will predominantly be for dust suppression while the quarry is operating. As the operations of the Site will occur on a campaign basis, it is not expected that their will be a requirement for continuous extraction from the existing groundwater well onsite.
		Weeds	Potential for noxious weeds to be introduced via truck tyres to outside the mineral claim area (Bluff Road).	If declared weeds are detected onsite they will be controlled in accordance with the requirements of the <i>Natural Resources Management Act 2004</i> .
		Native Vegetation and Fauna	Concerned clearance of native vegetation will impact native fauna such as birds, bees, insects, spiders, lizards and snakes etc.	As outlined within Section 2.11 Vegetation, Weeds and Plant Pathogens a Site inspection undertaken on 14 August 2017 and per comms with the landowner confirmed that the Site has historically been cleared of native vegetation and the vegetation onsite was planted approximately 10 - 15 years ago. As the vegetation onsite is relatively young, it is not considered to provide significant habitat for native fauna.
		Amenity	Concerns of the impact of the view of the quarry on surrounding houses and road users of The Bluff Road and Wilkins Highway.	As outlined within Section 2.4 Amenity , a visual assessment undertaken from representative locations surrounding the proposed quarry has indicated that the majority of the quarry will be shielded as the Quarry Development Plans (QDP) have been established to progressively quarry from the western side of the Site, utilising the localised landform to screen the operations from public view. As some of the operations may become visible during the later stages of quarry development, the QDP's have made provision for the early establishment of visual screens through tree planting to ensure that the vegetation has enough time to establish before the later stages of the quarry development are realised.

Confidential		Noise	Concerns hours of operation (6am - 6pm) are not consistent with <i>Environment Protection (Noise) Policy 2007</i> (7am - 10pm)	As outlined within Section 3.4.1 Modes and Hours of Operation , the extraction and crushing operations of the Site will be undertaken on a campaign basis, with crushing activities likely to occur for up to four (4) weeks per year. Due to the duration of the proposed activities and the location residential properties and windfarms adjacent to the Site, the proposed early start time for the Site is not likely to significantly increase the noise levels for the area.
		Blasting	Blasting from proposed operations will cause cracks in adjacent houses.	Blasting is only proposed when the rock becomes too hard to rip and will be undertaken by a licensed contractor in accordance with Australian Standard (AS) 2187 - <i>Explosives - Storage, transport and use</i> (Australian Standard). All blasts will be undertaken and monitored in accordance with a blast management plan designed to ensure that the ground vibration and air overpressure of each blast does not exceed the specified limits within the Australian Standard.
	Transport	Traffic	Sealing The Bluff Road to lower dust impacts of increased and heavy vehicle road use.	The Bluff Road forms part of the unsealed road network that is managed and maintained by the Regional Council of Goyder. S.C. Henrich & Co Pty Ltd have consulted with the Regional Council of Goyder to raise the community concern of dust being generated from the local unsealed road network.
		Traffic	Concerned increased traffic use will impact driving between paddocks.	As the operations of the quarry are proposed on a campaign basis, it is not expected that there will be a sustained increase in truck movements along the Bluff Road throughout the year impacting upon the existing use of the Bluff Road.
	Community	Heritage	Impact of quarrying on "Shepherd Hut" built between the two (2) hills to be quarried and its importance to local history.	A search of the of the South Australian and Commonwealth heritage registers did not report any objects and/or sites of national, state or local heritage that has been registered within the MLP area. Notwithstanding the absence of any registered sites within the MLP, S.C. Henrich & Co Pty Ltd will consult with the landowner to confirm the presence of an old shepherds hut and determine if there are any opportunities to retain it as part of the quarry development.
		Health and Wellbeing	Impact of mining proposal and operation on stress and anxiety of surrounding landowners	S.C. Henrich & Co Pty Ltd respect that the proposed operations may raise concern with the local community and are able to be contacted at anytime if there is a particular aspect of the operation that is raising concern. S.C. Henrich & Co Pty Ltd will maintain a complaints register for the Site to record any issues that have been raised and record the measures undertaken to resolve the complaint.

Name	Topic	Technical Issues Raised in Public Submissions	Feedback / Concerns	Response to Public Concerns
Regional Council of Goyder	Community	Land Use	Noted the primary purpose of land is Primary Production with some provision specific to mining (quarrying). Mining (Quarrying) must not affect the capacity of the surrounding land to be used for intended use / primary production, as well as maintaining environmental quality.	The quarry development plans for the Site involve the progressive implementation of rehabilitation which has been designed to achieve a final landform that is compatible with the surrounding land uses and support grazing. Additional rehabilitation strategies proposed for the Site involve the early establishment of visual screens to provide a visual buffer between the Site and adjacent land users during the later stages of quarry development.
	Transport	Traffic	Concern about trucks using Council road's and the potential increase of maintenance costs. Council would like Bluff Road Quarry to "bear all costs" rather than ratepayers. Council elude to the potnetial to enter into an agreement with associated bank guarantees. Council mentioned that under the <i>Local Government Act 1999</i> that the potential to impose a load limit along The Bluff Road is an option.	The operation of the Bluff Road quarry would enable road based materials to be locally sourced and potentially reduce the cost of material supply for local road projects, preventing the requirement for material to be sourced from other quarry's outside of the region and transported along other locations of the unsealed road network. As the operations of the quarry are proposed on a campaign basis, it is not expected that there will be a sustained increase in truck movements along The Bluff Road throughout the year impacting upon the existing quality of the Bluff Road. Discussions between Regional Council of Goyder (Council), S.C Heinrich & Co Pty Ltd and Groundwork Plus Pty Ltd representatives on 29 August 2018 removed the requirement for an independant Traffic Impact Assessment from Goyder Council perspective after the extraction profile (estimate 10kt per annum) was understood by Council representatives. The Council representatives agreed that the operator will not have to "bear all costs" of road maintenance, however, an agreed trigger whereby if a campaign sale opportunity arose >5kt in a short period of timeframe, S.C Heinrich & Co Pty Ltd representatives would contact and update Council representatives of their plans, additionally, photos of the road condition within close proximity to the Site will be taken and sent to Council. S.C Heinrich & Co Pty Ltd agreed to assist Council in maintaining some of the road network by assisting with treatment of water and grading if degredation from a campaign basis is realised. The potential for reducing load limits along The Bluff Road was discussed and Council indicated this action would be highly unlikely to occur. Additionally, the potential for Council to enter into an agreement with associated bank gaurantees was also discussed, this also would be highly unlikely to occur.
			Council have requested a traffic impact study prepared by an experienced and qualified traffic consultant.	Response outlined above

Attachment 2

Response to SA Government Consultation

Topic	Technical Issues Raised in Public Submissions	Feedback / Concerns	Response to Public Concerns
Environment	Noise	<p>Concerns short term limits with the <i>Environment Protection (Noise) Policy 2007</i> will not be complied with. Requested an acoustic assessment is undertaken. It should be prepared by a suitably experienced acoustic engineer and consider environmental noise impacts of the quarry on all nearest sensitive receivers (including the receiver within the lease boundary). The assessment should demonstrate compliance or give details and specification of what tenements, providers and / or practices are required to achieve compliance with all equipment operating and activities being carried out in worst case acoustic meteorological conditions (CONCAWE meteorological category 5 for the day and category 6 for night). If compliance relies on certain installations, conditions and procedures, then the report should give precise details and specifics about the type and location of these.</p>	<p>As outlined within Section 3.4.1 Modes and Hours of Operation, the extraction and crushing operations of the Site will be undertaken on a campaign basis, with crushing activities likely to occur for up to four (4) weeks per year. The closest residence to the operations is owned and occupied by the landowner who S.C Henrich & Co Pty Ltd have consulted with on a number of occasions. The landowner has subsequently provided consent for the proposed quarry activities and operations of the Site. S.C Henrich & Co Pty Ltd will continue to actively engage with the landowner about the operations of the Site and the timing and duration of proposed extraction and crushing campaigns. The operator does not propose to work crushing equipment and Heavy Mobile Equipment (HME) within the night time criteria period. The design of the Quarry Development Plan (QDP) has taken visual and noise impacts into consideration and used the natural topography of the land to assist in provided a natural visual and noise buffer from the disturbance area to receptors. Given the risk of noise impacts and exposure levels it is not considered appropriate to undertake noise modelling within the area.</p>