



**MOUNT BARKER**  
DISTRICT COUNCIL

FOL/20/648

16 July 2020

Charlotte Baker  
Mining Assessments  
Mineral Resources Division  
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GPO Box 320  
Adelaide SA 5001

Dear Ms Baker,

**Re: Hanson Construction Materials Extractive Minerals Lease Application**

Thank you for the opportunity to comment on this Extractive Minerals Lease Application.

**Context**

Mount Barker is undergoing significant change and over the next 30 years, with population growth, the town of Mount Barker will become a city – the second largest in South Australia behind the City of Adelaide. In this context, Council is supportive of sustainable economic activity that provides materials, goods and services to support the growing population and employment outcomes for residents.

With growth comes many challenges including retaining the rural character, ambiance, landscape quality and environment so highly valued by our community.

Council's ambition is to promote more sustainable use of resources, retain and restore biodiversity and create attractive and comfortable places for people to live, work and visit. This is as much a social and environmental imperative as it is an economic one. Whilst Council absolutely acknowledges the need for the resources needed to build the infrastructure to service our communities, this needs to be balanced with the local impacts on, and concerns of the community on where and how they are sourced. Council therefore seeks assurance that public health and safety and environmental issues resulting from mining activities are adequately addressed, both inside and outside the boundaries of the mine site.

With regard the Extractive Minerals Lease Application by Hanson Construction Materials, the following submission is made under relevant headings.

**Aboriginal heritage**

The Application makes only passing reference to Aboriginal Heritage that might be present on the site (Peramangk being the relevant custodians of this land), including reference to a check of the Register of Aboriginal Heritage Sites and Objects undertaken in 2016, which returned no entries for Aboriginal Sites. We note that it doesn't appear that any Peramangk people have been consulted in the formulation of this application and that no survey of the site has been undertaken. We also note the advice provided from the Department for Aboriginal Affairs and Reconciliation which states: "*You are advised that sites or objects may exist in the proposed development area, even though the Register does not identify them. All*

*Aboriginal sites and objects are protected under the Aboriginal Heritage Act 1988 (the Act), whether they are listed in the central archive or not. Land within 200 metres of a watercourse ... in particular, may contain Aboriginal sites and objects".* In regard to the latter part of this advice, the fact that the Dawesley creek runs through the subject land could well suggest the presence of Aboriginal Heritage items.

Council's view is that consideration of Aboriginal Heritage as part of this application is inadequate and its support of the application is conditional upon further assessment and engagement with Peramangk people.

**Aboriginal Heritage submission in summary:**

Council's support of the Extractive Minerals Lease Application is subject to further assessment of Aboriginal Heritage and engagement with the Peramangk people and the consideration and protection of any heritage elements that might be present on site.

**Wider community engagement**

As well as the relevant approvals sought from the South Australian Government, Council suggests that equally important is the mine's social licence to operate. To this end, consultation with the community should be genuine and regular in nature with authentic engagement on any proposed changes and generally in the operations of the mine. Council elected members and staff have strong connections in the community and welcome future discussions on issues that affect it. Key community groups, such as Kanmantoo Callington Community Consultative Committee, would offer valuable insights to enable engagement and connection. It is acknowledged that the mine contributes to the local economy and may offer some employment opportunities for locals.

**Wider community engagement submission in summary:**

The applicant is encouraged to work with Council and the community to ensure open and consistent communications and positive ongoing relationships.

**Road access and maintenance**

With regard to Proctor Road, Council and Hanson recently shared the cost to seal a short section (620m) of Proctor Road from the Old Princes Highway close to Harrogate. The total road length under Council's care and control is 3500m. The impact assessment for traffic on page 71 appears to be understated, referring only to the access gate. Council is the relevant road authority for applications under the National Heavy Vehicle Regulator and Proctor Rd will need to be carefully assessed to ensure it is fit for purpose given the nature of changes proposed. Impact assessment should include the township of Kanmantoo.

Much of the western end of the road has adverse horizontal and vertical geometry and road width. Significant improvement to the road design will be required to ensure the safety of all road users, particularly with regard to the road width and sight lines to ensure sufficient safe passing width is achieved. Drainage of the road surface and the associated side drains are currently steep and often deeply eroded which presents a road side drop off in some places. As part of improving the road geometry, consideration must also be given to more formal road side drainage that is not prone to scour and erosion noting further that the environmental impact of eroded and scoured side drains is the deposition of silt and road marking product into waterways.

The proposed truck volumes/tonnage detailed in the Application is 6 times the current volumes and represents a substantial increase in movements that will trigger a massive

increase in the requirement for maintenance and periodic renewal of both the sealed and unsealed sections of Proctor Road. The proportion of local traffic using this road (including between Sawpit Gully Road and the Old Princes Highway) will be negligible when compared to the tonnages proposed and as such it is submitted that as part of granting an increase to the EML, conditions of an approval/licence change are applied that ensure a user-pays approach to both the further upgrades to the road and the ongoing maintenance and renewal works that will be required.

The increased access and usage of the unsealed road will also heavily contribute to the production of dust from the road and, in this district, the prevailing winds are such that the dust will drop across the township area. Accordingly, in considering the appropriateness of the road and any requirements that are applied to a licence change, the finished surface of the road should be of a sealed nature to ensure dust production from running on the road is better managed.

With regard to Sawpit Gully Rd, no use of this road should be assumed into the future as it is unsuitable for heavy vehicles and has a number of residents along its length.

Finally, with regard access to and from the site, Council is aware of community interest in possible alternative access options (namely, a new road). Council makes no representation on feasibility of alternatives other than to note the significant community concern on traffic movements and the potential multi-generational impacts on this community. A new private road that connected with the Hillgrove Resources private road is something that would need to be investigated and negotiated by the applicant with Hillgrove and other relevant landholders. A new public road and the associated costs of construction and maintenance is not something that would be supported.

**Proctor road submission in summary:**

Proctor Rd and the township of Kanmantoo need to be carefully assessed to ensure roads are fit for purpose. Approval of an increase to the Extractive Minerals Lease should include conditions that oblige the applicant to pay for further upgrades to Proctor Road and the ongoing maintenance and renewal works that will be required. To avoid dust nuisance to surrounding properties and the township of Kanmantoo, Proctor Road should be sealed in its entirety and fully funded by the applicant. A commensurate contribution to the maintenance obligation should also sit with the applicant.

**Flora and Fauna**

The mining lease area contains native vegetation and habitat that supports rare and threatened species. *Eucalyptus odorata* Grassy Woodland, identified as a critically endangered vegetation association under the Commonwealth's Environment Protection and Biodiversity Conservation Act, occurs in proximity to the site.

Council notes that the vegetation survey was undertaken during November and March during a dry period and that many of the native species that occur in the areas may have not been present or difficult to identify. Given that this year is shaping up to be a year of close to average rainfall it would be prudent to resurvey the site in the spring of 2020 to be confident that native species are adequately identified so that protective measures can be taken.

Notwithstanding the apparent relative absence of significant vegetation and habitat, Council notes that there have been significant conservation efforts in the region, including on adjacent properties and that the commitment to a very long term mining operation should coincide with a commitment to progressively rehabilitate degraded parts of the property,

including the Dawesley creek. Rehabilitation should be ongoing for completed sections and not wait for the end of mining activities.

It is noted that Hillgrove Resources devoted considerable time and effort to rehabilitate *Eucalyptus odorata* woodland on their site and suggest that this would be an appropriate model to follow.

Council supports the endeavours of the company to avoid vegetation clearance where possible but notes that some vegetation clearance is unavoidable. Council suggests that remnant vegetation protection should take priority within the mining lease area and that revegetation should be undertaken using best practice techniques and the use of local provenance tube stock.

Revegetation should be undertaken using up to date knowledge on the science of revegetation and the habitat requirements of local species. Council suggests that the Callington Landcare group and Goolwa to Wellington Local Action Planning Group should be engaged to help establish the revegetation site to demonstrate good corporate responsibility and support for the local community effort to protect and restore biodiversity values. Special attention should be paid to the section of the Dawesley creek that runs through the site.

The new Hills and Fleurieu Landscape Board would no doubt also have a keen interest in this site and should also be consulted on issues within its remit, including native vegetation and watercourse management.

**Flora and Fauna submission in summary:**

Better assessment of onsite biodiversity is needed in order that it is appropriately protected and managed. Conservation works should be embedded as a core management activity of the site. These activities should include creek rehabilitation and revegetation that is consistent with the efforts of surrounding landholders and community groups. These groups should be engaged for advice and technical support to help with these efforts.

**Water use and runoff**

It is noted that the Site is located within the lower portion of the Eastern Mount Lofty Ranges Prescribed Water Resources Area Surface Water Management Zone, which forms part of the larger catchment area associated with the Bremer River. Surface water originates from the northern portion of the zone and flows in a southerly direction through the Site before discharging into Dawesley Creek which flows southerly into the Bremer River. Council notes the proximity of the Dawesley creek to the works zone and the erosion, sediment and silt controls detailed in the application.

Water resources are a critical resource for the areas' farming community and ecosystems. Council seeks assurance that site runoff facilities will be constructed to ensure that no contamination of ground or surface water resources occurs. It is also suggested that special attention is paid to the watercourse that flows through the site and its value as habitat for the region's wildlife.

**Water Resources submission in summary:**

Surface and groundwater resources are critical to the productive capacity of the region's farmland and protection of biodiversity. Management of sediment and other pollutants will be critical in order that water resources are protected during the life of the mine. Watercourse rehabilitation will help protect water resources and associated habitat and biodiversity.

### **Air Quality - Decrease in Air Quality Due to Dust Emissions**

The main potential air quality issue that will result from construction and operation of the quarry is the liberation of particulate matter with consequent adverse impacts to human health and amenity. Council notes the concerns raised by stakeholders pertaining to nuisance dust emissions throughout the consultation process, and the dust management actions detailed by the proponent. The potential for dust nuisance to impact on the environment and amenity of surrounding areas is significant and must be given a high level of attention and management. Please note that the Council has an obligation under the provisions of the Local Nuisance and Litter Control Act to investigate any complaints relating to excessive dust emissions from the site should they occur, so, as indicated, dust mitigation strategies should be a high priority during the operation of the quarry. Dust suppression chemicals must be used carefully to avoid potential for negative human health impacts if airborne.

Council notes a reference to recycled water on page 36 of the application. Where possible, the use of local recycled water should be considered for mining activities and dust suppression to minimise impacts to the environment and precious River Murray water.

#### **Air quality submission in summary:**

Dust pollution can have significant impacts on the health and amenity of people and communities adjacent the quarry site. Council's support of the application is dependent on how well the proponent can demonstrate dust will be retained onsite and in its implementation and monitoring of control and management strategies.

### **Noise**

Council notes the potential for noise impacts on the community, particularly with blasting to increase some 15 times or more.

#### **Noise submission in summary:**

Council seeks reassurance that noise impacts will be no worse than it is for the current level of operations.

### **Greenhouse Gas Emissions**

There doesn't appear to be any assessment of the Greenhouse Gas (GHG) Emissions that will be released as a result of the mine establishment and operation. Whilst Council acknowledges that this may not be a requirement of the Extractive Minerals Lease Application, awareness and monitoring of GHG emissions, and efforts to reduce emissions, should now be core business for any major business, especially in the extractive industries.

The mining industry in general has a very large footprint and there is strong community desire to see action on emissions reduction. Mount Barker District Council has declared a climate emergency and committed to increase efforts to reduce GHG emissions through its Climate Change Action Plan. There is an opportunity for Hanson Construction Materials to demonstrate leadership in the mining industry in terms of minimising and reducing GHG emissions.

Avoidance, mitigation and management strategies to minimise and reduce GHG emissions might include:

- Developing and applying policies and procedures for energy efficient mine operation
- Minimising haul distances
- Monitoring energy consumption (e.g., diesel and electricity) and calculating greenhouse gas emissions
- Establishing measurable improvement targets (e.g., participation in revegetation programs) for greenhouse gas emissions
- Considering the use of alternate fuels and technologies
- Considering the use of efficient siting and design of power-efficient lighting
- Ensuring that vehicles (company-owned and contractors) are well maintained and correctly sized to maximise their fuel efficiency and minimise emissions
- Reporting greenhouse gas emissions in accordance with the State and Territory Greenhouse Gas Inventory

**Greenhouse Gas Emissions submission in summary:**

The applicant should show what the estimated Greenhouse Gas emissions over the life of the mine will be, develop a GHG monitoring and reporting program and initiate actions to reduce its emissions. Consideration should also be given to participating in an accredited carbon offset program.

Thank you for the opportunity to make a submission to this application. Please note that this submission is subject to endorsement by Council at its meeting on 3 August 2020. You will be notified of the outcome of this process after the meeting. For clarification on any aspect of this submission please contact Greg Sarre, Manager Economic Development and Sustainable Futures at [gsarre@mountbarker.sa.gov.au](mailto:gsarre@mountbarker.sa.gov.au)

Yours sincerely



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