

Harry Seager
5 Montefiore Street
Callington. 5254

0409622382
hseager@adam.com.au

Submission in regards to Hanson Construction Materials - Kanmantoo
Bluestone Quarry Expansion.

Thank you for the opportunity to make this submission in regards too this
application.

Regards

A handwritten signature in black ink, appearing to read 'H Seager', is centered below the text 'Regards'. The signature is written in a cursive style with a long, sweeping tail.

Harry Seager

NB: Please note that whilst I am an elected member of the Mount Barker
district council this submission is my own personal viewpoint and does not
represent the views or position of the Mount Barker District Council.

Introduction

The proposed expansion of the Kanmantoo Bluestone Quarry (KBQ) will provide economic benefit within the Mount Barker District Council (MBDC), and beyond. This will occur through the creation of local employment, for those nearby and for others. It will provide a benefit to the State Government by increased royalty payments and by supplying materials necessary for the continued expansion of the construction industry in the surrounding area. However there will also be a cost for this growth, particularly in the predicted increase in dust and traffic as stated in the application and in the loss of amenity suffered by the nearby communities as a consequence of these and other impacts. Consideration of the application should be acutely aware of these impacts and ensure that whatever the benefits these are not achieved at the cost of the community surrounding the site of quarry expansion or along transport routes servicing this site.

The Kanmantoo community has borne the impacts of dust, noise and traffic consequent to the operation of the nearby Kanmantoo Mine by Hillgrove Resources, regardless of whether these were within the regulatory limits. From the community perspective the impacts on their community were such that they could only question the adequacy of such limits when applied in a context where their town of many hundreds of people was in such close proximity to the source of such impacts. As the KBQ operation will be a similar distance from the township the question of the ongoing adequacy, and enforcement of such limits is clearly of great concern for this community. Overall it is difficult to support this application which seeks to impose unreasonable impacts on the Kanmantoo and Callington communities, especially in regards to the volume of heavy traffic and the desired hours of operation.

Existing oversight

Current publicly available aerial mapping shows the current approved quarrying operations has extended significantly beyond the confines of the approved lease area. The failure to enforce compliance with lease conditions and to limit operations and impacts to within the defined area of operations does not generate any confidence for any future operations.

There is a deep cynicism in regards to the willingness or ability of the regulator to effectively apply and enforce the regulated standards, and for many a personal experience of the inadequacy of these standards when applied in the context of such operations in close proximity to a township. This is a common perception in regards to the operation of the Kanmantoo Mine, the Neutrog composting facility on Mines Road and the existing quarry operation as discussed above.

Heritage

The section regarding Heritage is both entirely inadequate and inexcusable.

There is virtually no comment in regards to European heritage, notwithstanding the existence of physical evidence in the form of dry stone walling adjacent to the Dawesley Creek, and extensive ruins on an area to the south of the creek on the neighbouring property. This does not necessarily mean there is or was anything on the areas in question, but the lack of information makes any such judgment impossible.

The purported engagement with indigenous heritage and the local Peramangk community is bordering on an insult to that community and should be a cause of some embarrassment to those responsible. A quick search has shown the following.

”Another smaller group of people, who may have shared their lands with the Peramangk and the Portaulan people (from near Wellington), were the Ngaralta, who lived in the general area of the Bremer Creek, Red Creek and Callington. These people often made their camp along the Bremer near to where the Salem Church now stands, and would travel in later years to the edge of the town of Callington to receive their blankets, flour and tobacco provided for them by the Protector of Aborigines.”

(Fleurieu Peninsular Family History Group Inc, last updated November 16 2008).

Clearly the indigenous history of this area is, unsurprisingly, more complex than revealed in the application. The origin of the word Kanmantoo implies a meeting area, while the area now known as Native valley, to the northwest is recorded as a site of ceremonies and trade. This aspect of the application should be revisited, with the wider Peramangk community being given the opportunity to inspect the area and make comment as they see fit.

Traffic

By the figures given in the application vehicle traffic, not including that could reach 15,000 loads per year by 2033. This figure is qualified by reference to some uncertainty as to what size truck may be used for transport, although a figure of up to loads of 40 tonnes is given on page 32. In itself this figure leaves hanging the question as to the potential likelihood of a future request to upgrade the route to allow the maximum "B-Double" vehicles at some stage in the future. Regardless, comment can only be based on the figures given, which must be taken as representative of the traffic expected. At the numbers provided there will be, on average, 288 loads every week assuming a 52 week operation. Over an assumed 6 days per week of operation this will equal 48 loads per day. I consider it highly unlikely that operations will be more than 9 hours per day and at such levels this would average 5.3 per hour or one every 11 minutes. To further compound this is each load would need a trip in and a trip out, effectively doubling the movements stated. At this rate potentially a vehicle capable of carrying 40 tonnes every 5.5 minutes! This reality has been confirmed as the worst case scenario at a meeting with the Groundworks Quarry Consultancy representatives, at Kanmantoo on the evening of July 21. It is of course unlikely that this level of traffic would be spread equally over 9 hours of every day, or 6 days per week. Much heavier levels of traffic can reasonably be expected over shorter periods per day, or over fewer days, increasing the frequency to even higher levels for some hours of each day, or higher still over fewer days. If the production figures are accurate there could be practically constant truck traffic entering or leaving the quarry and traveling

through Kanmantoo and Callington for extended periods every week at peak production levels. This level of traffic would have a disastrous effect on the amenity of these communities from the noise, dust, vibration and the safety impacts accompanying such volumes. Currently these roads are used by local and regional traffic primarily, including numerous school bus movements. Students await buses alongside these roads in both Callington and Kanmantoo and many walk to and from the various pick-up points.

Such an outcome should not be countenanced and alternative routes or means must be found.

There remains the potential to develop a road access connecting from the quarry site through existing unmade road reserves to the Hillgrove owned Kanmantoo Mine site and onto the Princes Highway via their current private access road. This current status is being renegotiated with MBDC following that Council's approval of the Kanmantoo Employment Land Development Plan Amendment. Final Ministerial approval of this DPA is likely to be at some stage after this latter issue is resolved. This alternative route would entirely avoid heavy traffic using the roads through Kanmantoo, and the consequent necessity to upgrade and seal Proctor Road. However the issue of the construction and ongoing maintenance of this connecting section should remain a Hanson responsibility and cost. As suggested below in regards to Proctor Road this should not fall to MBDC, or their ratepayers, who would receive very little if any benefit from this in terms of their use of such a road.

While this may seem an inordinate burden to place on the operators of a quarry producing a low value bulk material it remains that it is their intention for this site to be operating for an extremely long period. As such Hanson has the opportunity to defray the costs for this construction over the same period, in much the same manner as they would seek to recover the costs associated with proposed upgrades to the quarry and crushing plants, estimated by them to be in the order of 15 to 20 million dollars. The argument that the costs of construction would render their operation uneconomical is hardly one to engender support for the expenditure of ratepayers' funds on such

construction. It is not the role of Council or ratepayers to support uneconomical operations, and especially when taken in the context of the likely extremely negative impacts on many hundreds of residents in the communities which are going to be impacted by the quarry in other ways.

This would then leave only the issue of access to the Freeway, through the township of Callington, at the same potential frequency and level of disruption as noted previously. In the first instance the speed limit should be lowered to 50 KPH, to at least partly address the issue of safety. This road is abutted by private residential allotments, with children using this road to access school, parks and sporting facilities. It also has a number of bus stops used by children traveling to locations beyond Callington. Consideration should also be given to ensure that vehicles avoid traveling through Callington during school bus pick up and drop off times, as was instituted by Hillgrove in response to similar concerns during public consultation prior to their mining approval. The impacts at the suggested peak operations are unacceptable to the Callington community, with suggestions by residents being forced to leave already current in both communities. Such consequences are unreasonable and for this expansion to proceed some means must be found to reduce the impacts on local communities. Conditions must be imposed to achieve this, up to and including refusal should no reasonable solution acceptable to the effected community be found.

Dust

Local communities have experienced the impacts of excessive dust during the operation of the nearby Kanmantoo Mine. While the number of breaches of the legal limit may have been limited this measurement has only thrown into high relief the inadequacy of the current standards when applied to a situation where the nearby township of Kanmantoo is in such close proximity to the source of such dust. The impacts on Callington have been less severe but entail nonetheless a loss of amenity which the residents are expecting to cease with the end of Hillgrove operations, not be extended for a further three generations. By any objective standard the impacts have been a fouling of gutters, roofs and rainwater tanks; impacts on individuals with

respiratory issues and a significant and general loss of amenity as every surface is continually coated with fine dust, both inside and outside of buildings. While this may seem relatively trivial to anyone not experiencing this it is a relentless and frustrating experience and one these communities have no desire to extend beyond the operations of the Kanmantoo Mine.

The existing quarry operations have been a source of significant dust issues in the past, and especially as operations have expanded under the ownership of Hanson. This can be verified by reference to the dust monitoring records kept by Hillgrove Resources in relation to the operations of their Kanmantoo mine. These clearly demonstrate that when conditions cause winds to blow from the Hanson operation towards the mine site significant levels of dust (particulate matter) blows towards and then across the Kanmantoo mine site, material for which they are blamed by the local community. I personally have witnessed the massive plume leaving their site on such occasions, clearly visible from the South Eastern Freeway.

The Kanmantoo Quarry site is approximately the same distance from Kanmantoo as the Hillgrove site, but more poorly situated. With prevailing winds towards the township the impacts of dust from the quarry will inevitably increase as the scale of operations increase. The application does clearly state “there will be an increase in particulate matter” from expanded operations. It contends that this can be ameliorated by appropriate measures, such as the use of water to keep areas damp, the use of stabilizing spray –on materials and the creation of windbreaks to reduce wind speed. The community has little faith in such measures being delivered and effective, and even less in their effective enforcement. This is especially so in light of the clear failure to provide effective oversight in regards to the off-lease expansion of the current operations referred to earlier. The operation of the Hillgrove Resource’s Kanmantoo Mine has sensitized the community to the difference between the regulatory framework and standards and the lived experience and impacts of such operations. Any increase in dust will be unacceptable for a community that has been furiously awaiting the cessation

of mining at the Kanmantoo mine and the reduction of the dust impacts which have blighted their lives over the past nine years.

Proctor Road

The Air Quality Assessment- Proposed Kanmantoo Quarry Extension report, states, on page 164, "It should be noted that Proctor Road is proposed to be fully sealed by the end of 2019, minimizing the potential dust emissions associated with trucks and vehicles accessing the site". Whilst this action is highly desirable it is not correct, and has no basis in fact. While Hanson and the Mount Barker District Council have cooperated to improve and seal a short (800 metres) section of Proctor Road, leading from the Princes Highway, there is no agreement beyond this project or regarding any of the remaining unsealed section.

It is also clearly stated that this road is the responsibility of the Mount Barker District Council. I believe this is unreasonable given the expected volume of traffic, especially over the expected life time of this operation which is likely measured in centuries, not years. I believe that it should be incumbent on Hanson to upgrade and seal the entire length of this road, to the quarry entrance, at their expense, as virtually they alone will receive benefit from it, as opposed to any other users. I feel it is unreasonable and inequitable for them to expect DCMB ratepayers to fund the construction and maintenance of this road over the very long period and with regard to the high impact which will attend Hanson's use. It should be upgraded as the quarry develops, perhaps staged over a number of years as traffic increases. A suitable number of trigger points should be able to be determined the points at which each stage becomes required. These must become enforceable conditions for permitting continuing operations to ensure timely completion.

Overall I believe the better option is to create a new road through to the current Hillgrove private road, as discussed earlier, as this also resolves a number of other issues.

Native Vegetation

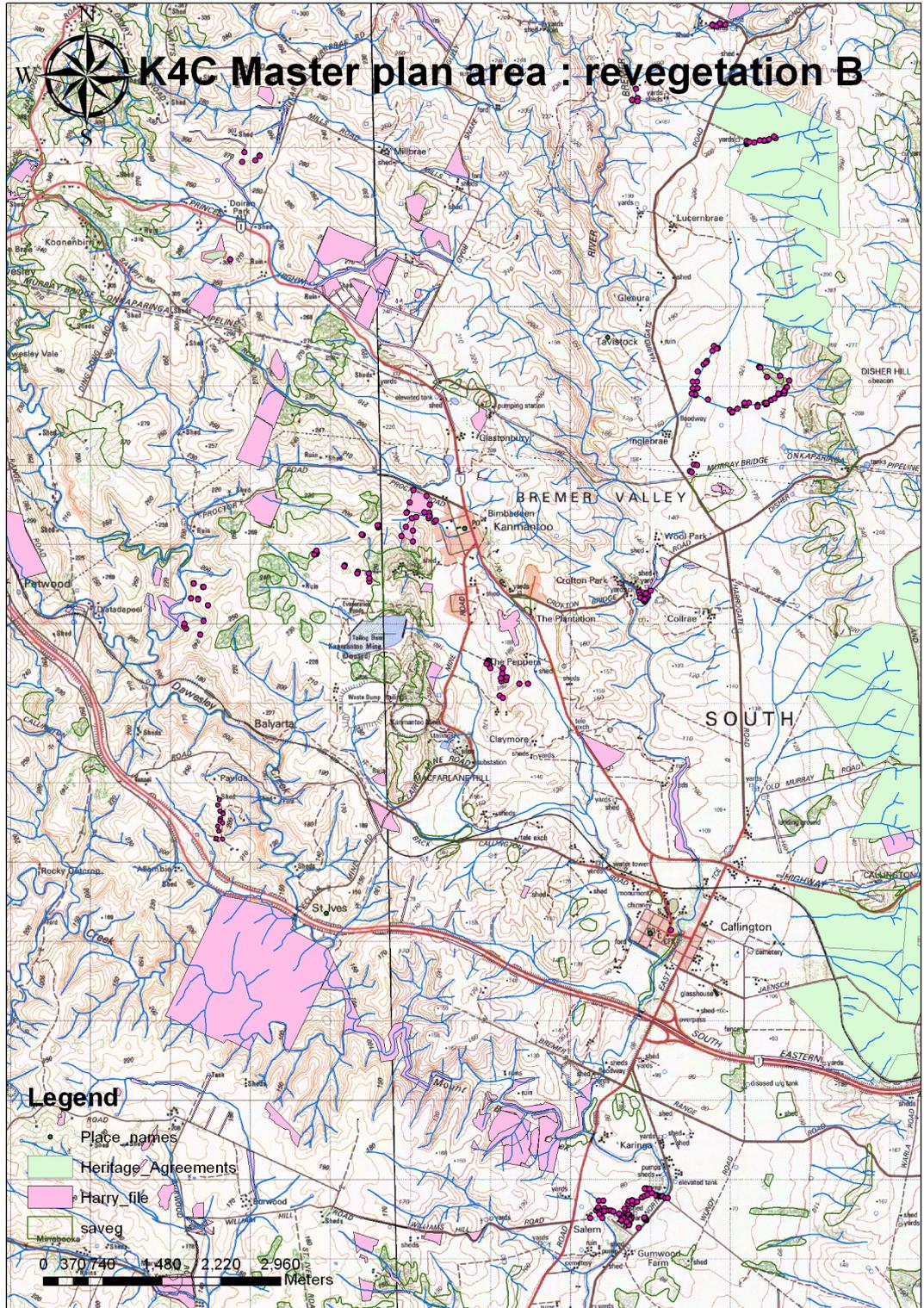
There are a number of issues of concern in regards to the section on native vegetation. Firstly is the sweeping generalization that no assessable vegetation exist across much of the site because it has been “historically cleared of native vegetation” (page 43). This characterization of the area as being devoid of native vegetation is worrying, as is the timing of the vegetation surveys that were conducted. I note with some relief that the intended area of operations exclude the Dawesley Creek, areas to the east of this, the tributaries that flow into it from across the property to the west and that the existing drainage line which has been piped remains largely as is.

While I acknowledge the work undertaken in conducting the surveys once again the timing of vegetation surveys is an issue. A survey in March following the driest year on record is hardly conducive to producing a clear indication of native vegetation extent or condition, rather akin to counting Crows supporters at Adelaide Oval in the middle of post-Covid Tuesday morning. The November survey suffers the same issue, but to a lesser extent. As this application overall has been developed over some time it is disappointing that these surveys were not undertaken at a more propitious time. As it is timing of these surveys contributes in some part to the generally low biodiversity scores recorded which in turn reduce the value placed on such remnants and hence further reduce dollar costs of SEB offset payments calculated for vegetation clearance purposes. I continue to be disappointed that such inappropriate survey times are considered acceptable by the regulators.

The property overall would have been most likely covered with what was locally described in the 1840's as forest, most likely what would now be a called an open woodland. Inferred from other more recent survey work in the local area this would most likely have been a Peppermint Box/Blue gum/ over-storey depending on aspect and elevation with Drooping Sheoak across the drier ridges intergrading into the Nairne upland Red gum communities to the west, with riparian Red gum communities along the drainage lines. Remnants of all these communities occur on or surrounding the site in question. It should

be noted that the most westerly outlier of mallee remnant (in the Mt Lofty Ranges) occurs just south west of the freeway –Back Callington Road intersection. A locally characteristic suite of under-storey shrubs, now largely eaten out after many generations of grazing combined with the impacts of rabbits, would have once been present. As such the existing cover is in my opinion best characterized as a derived grassland, now dominated by exotic species. A more timely survey would most likely find a range of forbs and herbs such as is usually evident in similar local rocky ground. These typically survive on uncultivated grazing land, especially amongst the rocky outcrops and on steeper areas of such properties, typical of much of the land the subject of this application.

As a principle the local community believes that funds which are generated by the offsets for the clearance of local native vegetation should be spent in the local area from which they are derived, to allow for the regeneration and replacement of vegetation and so provide replacement habitat for local fauna. This principle has been largely applied for the operation of the Hillgrove Resources Kanmantoo Mine and is included within the goals of the K4C Master Plan document, which includes this site within its area of concern. This Plan was developed during the operations of the Kanmantoo Community Consultative Committee (K4C), an award winning community forum operating under Terms of Reference from the then Minister for Mines and Energy. I believe the efforts the community has taken to develop a vision for their future and in particular that expressed in regards to environmental issues should be acknowledged and their clearly expressed wishes agreed to.



Please note that Hillgrove Resources revegetation works are not shown. “Harry File” of Legend is the collected *Bremer Barker Catchment Group, Kanmantoo Callington Landcare and Goolwa to Wellington Local Action Planning Association* on ground works from the 1990’s to the present.

The creation of buffers to screen the intended quarrying operations is applauded both for the improved amenity they will provide but also for the potential to provide increased areas of vegetation and habitat for local fauna. For the latter reason these should be comprised of local native species for both over-storey and shrub layers. I would like to see at least a significant proportion of the SEB offset funds used to re-establish areas of over-story across the site, in line with the need to create linkages and corridors across the landscape to improve habitat for local fauna. Given the ongoing collapse in the numbers of many bird species in the Mt Lofty Ranges the opportunity to provide more extensive and better connected habitat should be taken. This is particularly so for those areas abutting the Dawesley Creek, to increase the patch size and provide buffering from the operations of the quarry. While this may seem excessive it is the intention to operate this quarry for possibly 140 years. I believe any approval should recognise the very long term impacts of such an operation, and for the opportunities to provide compensating biodiversity benefits well into the future.

Waste Derived Fill

The introduction of this concept has set off alarms in many who have read it. The intent to use clean excess soil and excavation “waste” to buffer and cover the quarry fines proposed to be backfilled into quarried areas is reasonable. This should allow a better, deeper cover over this quarried material which has been described as abiotic, and is clearly not suitable to support revegetation efforts. However it remains unclear as to what this material would consist of. It is referred to as “clean fill”, such as is derived from road construction or site works. However in other places concrete waste is mentioned. The presumed assurance that any material exceeding 100 tonnes from any one site would need EPA certification is alarming, inferring that other lesser sources will have no oversight mechanism to ensure EPA standards are met. This lack of oversight leaves open the potential for abuse of any approval, especially on the part of the entity wishing to avoid the costs associated with legal disposal at a suitable facility. I accept that Hanson would be unlikely to wish to accept unclean or contaminated fill for which they could then be accountable; however legitimate concerns remain as to how this

aspect of their proposal will be managed. There is a concern that this could become a de-facto waste dump, with unregulated and potentially contaminated waste being opportunistically delivered without any effective oversight by regulatory bodies.

Much greater clarity is needed in explaining what exactly is being proposed, and how it would be effectively regulated.

Hours of Operation

The application seeks to ensure the broadest possible hours of operations. This on the basis that quarrying and crushing operations would be confined to within the hours of 6am to 10pm, with actual operations generally at a lower figure subject to demand for materials. The loading hours sought are for possible continuous operation, 24 hours over every day of the week. Loading hours would presumably reflect general hours of operation except in cases where there was a period where extended hours might be needed to meet contractual obligations.

Surely it is beholden to the quarry operator to only commit to supply materials at times that do not unreasonably impact on the surrounding community. Material could conceivably be stockpiled during normal hours at any site needing massive volumes. Any increased cost resulting is surely the price of any 24 hour construction operations, to be borne by the parties undertaking the works for which the material is required. These costs should not be transferred to the community surround a quarry by having it operate up until 10 pm, with loading and transport continuing potentially over 24 hours seven days a week. The very broad hours sought by the proponent are not acceptable to the community who quite reasonably fear the potential impacts of such license, especially when taken together with the massive increase in traffic that is predicted in the application. Whatever the economic benefits that flow from quarry operations these should not be predicated or dependant on the losses and impacts on another section of the community. No Community should be expected to potentially be subjected to traffic carrying 40 tonnes every 5.3 minutes for up to 24 hours a day over some periods which could be the case if the current application were to be approved. Similarly quarrying

operations from 6 am to 10 pm are excessive, allowing no respite from the predicted increase in dust, seven days a week.

These proposed hours are not unacceptable.

Public / Community Consultation

The application for an extension is, in my opinion, is flawed in a number of areas and has significantly misrepresented the depth of public consultation with the local community. It is generally acknowledged that Hanson responded positively and well to the issue of heavy vehicles using Sawpit Gully Road (an unmade minor local road). They have effectively banned its use by vehicles accessing their operation, to the point of dismissing drivers who breach this condition. This has significantly improved the safety and amenity of other residents on the road and has been appreciated by these people. This had perhaps been seen as a foretaste of their future relationship with the community, abetted by the cooperation with Council in sealing a section of Proctor Road. Many are now re-assessing that opinion.

Hanson Quarry representative have attended the meetings of the K4C, and provided some information in regards to their intentions. However at the last meeting they attended, in November 2019 they were not very open in regards to the state of their application, the subject of this submission. When asked directly they replied that the application was still being developed, and gave no detailed information; this reply was accepted at face value by the meeting. Clearly more progress had been made than they relayed to the meeting.

They have also held a series of open days, the first of which I attended. I received no further information or contact in regards to those held since, which I find odd in retrospect. I have a clear interest as local resident, as someone who sits on the K4C, and as a local Councilor who could reasonably be expected to have an interest in local development. I understand from other residents, local to both Kanmantoo and Callington that they have been unaware of any open days held recently, and have not had any contact from the company in regards to their intended development.

The scale and predicted impacts of the proposed expansion of the quarry operations have come as a shock to many in the local community. As mentioned earlier there is already discussion of being forced to move rather than endure the potential impacts, effectively in perpetuity.

Staged approval, performance based.

For an expansion of operations of the scale and duration that are proposed in this application the notion of one, final approval process is inadequate. The brief reference to the possible expansion of this operation to include a concrete batching plant is an indication of the need for staged approval of activities.

It can reasonably be expected that over the expected 140 year operation of this quarry community standards and regulatory requirements will evolve and change. In light of this I believe that any approval given should be final for only one stage of this expansion, with others being dependant on the upgrading of regulatory standards to those current at the time, and entirely dependant on the successful compliance with regulatory standards and whatever conditions were applied to previous stages. Thus non-performance in regard to regulatory standards, or any other conditions that might be applied in the approval of any one stage would reduce or even potentially eliminate the possibility of further expansion. This should act as a strong incentive for the quarry operator, which may not necessarily be Hanson in the future, to maintain regulatory compliance in both the short and longer term.

Conclusion

- I believe the any approval given should contain conditions regarding the creation and maintenance of an alternative low dust road, constructed at Hanson's expense to entirely bypass Kanmantoo, construction of which should be a necessary condition for further expansion beyond stage one. The only acceptable alternative would be the sealing, at Hanson's cost of the entirety of Proctor Road, to and

beyond the quarry gate to encompass internal quarry roads as much as practicable. This would not however resolve the traffic impacts through Kanmantoo and is a poor second choice.

- The standards of noise conditions should be those applied to Hillgrove Resources, which are at a lower level than those contained in this application.
- Hours of operation should be reduced to disallow 24 hour loading and carting. Quarrying and crushing should be restricted in line with community expectations which certainly do not extend to close of operations at midnight.
- The suppression of dust must be a priority: The proposed crushing plant to be enclosed to the maximum extent compatible with safety and operated to minimise dust through use of water sprays, and incorporating best practice methods.
- Local Native species should be used for revegetation, including buffers. The opportunity should be taken to provide larger fenced areas and corridors buffering the Dawesley Creek to improve biodiversity and habitat consistent with retaining the capacity for productive use of the balance of the land. Rehabilitated areas should be reseeded with local native perennial grass species, utilizing the techniques and materials developed by Hillgrove Resources at the Kanmantoo Mine.