

14th August 2020

Charlotte Baker  
Mining Assessments Mineral Resources Division  
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Dear Ms Baker,

Re: Hanson Construction Materials Extractive Minerals Lease Application

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

The Kanmantoo-Callington Landcare Group (KCLG) has been actively working to improve flora & fauna diversity in the area since 1994. It has liaised with many landholders & community groups and is well known & well regarded in the district. It has had a representative on the Kanmantoo Callington Community Consultative Committee (KCCCC) since it began. Being made up of local members, the KCLG is also representative of local landholders and township residents.

KCLG members recognize that quarries bring economic and social benefits to our society, and can bring environmental benefits. We are aware that Hanson has contributed \$10,000 towards the new Callington Community Centre, & this is greatly appreciated.

However the KCLG does have concerns about the extent of this MLP and its negative social impacts. Our concerns are under headings below.

1. Community consultation: The claim that Hanson has been engaged in 'extensive community consultation since acquiring the lease' is not accurate. Some community members may be aware of a possible expansion, but very few have an understanding of the size & project life of the MLP. Details about the scale of the project have only recently been released & there has been no specific, focused discussions with the community about noise, dust, & traffic etc.

Similarly, it is disappointing that the Landcare Group was not identified as a stakeholder for communication pathways, despite its submission in 2017. It was not directly invited to one on one meetings or Open Days and did not receive newsletters.

Hanson staff have been to some of the KCCCC meetings and given brief, & very general reports from time to time. These meetings were about Hillgrove's progress & were not designed or advertised to be about Hanson.

Now that we have the detail, extensive Community Consultation needs to occur. Hanson needs to provide a clear outline of how & when they will consult with the community, and provide details of how they will advertise the consultations. Structures need to be set up to ensure ongoing community concerns are addressed during the life of the project.

2. Project Life: The projected life of the quarry is 140 years. This is almost six generations into the future. It is unreasonable for anyone to ask, or to be asked, to approve such a project life. The MLP approval must be staged. Stage Two must depend on the company following all agreed procedures accurately, transparently and with full

community consultation during Stage One. Future approvals must be dependent on the compliance of the previous stage. Hanson needs to prove that its outcomes lead to a social & environmental benefit to the community. This is a major point of concern that we want resolved before the MLP is given any approval.

3. Air Quality: This is a major issue. The increase in particulate matter in dust will severely impact Kanmantoo as it is near the quarry directly in the prevailing wind direction. Kanmantoo has had to suffer increased dust from Hillgrove for the last nine years. People in the town are saying life there is becoming unbearable. In meeting after meeting of the KCCCC, members of the landcare group heard distraught residents complain about the constant dust on surfaces indoors & out despite constant cleaning. Dust does have a physical impact, and stress levels are increasing. People who buy in Kanmantoo (and Callington) do so because they want a quiet country life with clean open air. The dust impacts the quality of the rainwater, the effectiveness of solar cells, the health of native vegetation & home-grown vegetables, and ultimately the mental & social health of residents.

The issue of dust was raised in KCLG's submission to the Mining Regulation Branch in August 2017. Since then Hanson and the Mount Barker Council have sealed a section of Proctor Road, which has significantly reduced the dust from traffic along that road.

Hanson should create an alternative sealed road along unmade road reserves to the Hillgrove Mine Site and then use the Hillgrove Access Road to Old Princes Highway. The road would need to be fenced, and sited appropriately to avoid losing significant remnant vegetation. Given the possible life expectancy of the quarry, the alternative road is worth the outlay. It would mean Proctor Road would not be used by trucks & therefore it would reduce the road dust issue in Kanmantoo.

Another option is the sealing & maintenance of the full length of Proctor Road if it continues to be the main access to the Quarry. We have noticed that trucks have been creating bypass lanes along Proctor Road. Areas of the rare native grass *Bothriachloa macra* have been damaged. Due to the density of truck movements, consideration needs to be given to creating a slip lane so that informal lanes are not created.

Dust mitigation strategies should be a high priority during the operation of the quarry. Stabilisation of the extraction pits using chemical dust suppressants & progressive rehabilitation are essential. The proposed crushing plant needs to be fully enclosed.

4. Noise: This is another major issue. KCLG members expect the MLP to generate significant noise stress because of traffic & quarry operations. Blasting should be limited to sunrise to sunset, Monday to Saturday. Traffic noise can be eliminated for Kanmantoo, if the Hillgrove Access Rd is used (see above) and hours of operations reduced. The standards of noise conditions should be those applied to Hillgrove Resources, which are at a lower level than those contained in this application.
5. Traffic & Safety: The proposed truck volumes/tonnage detailed in the application is 6 times the current volumes. This will result in a substantial increase in traffic that will severely impact the towns of Kanmantoo & Callington. A maximum of 288 loads per week, 52 weeks of the year means that the maximum could be one truck every 15 minutes over 11 hours/day, not including current truck movements from other sources.

The impact assessment for traffic (page 71) appears to be understated, referring only to the access gate. There is no mention of the impact of truck movements on public safety

in Kanmantoo and Callington. The route through these towns is on main roads used for walking for exercise, children & dogs. The main roads have minimal footpaths, a number of school bus stops, and two adjacent playgrounds. Similarly, there is no mention of the effect of vibration on nearby houses.

A partial answer to this problem is for Hanson to use the Hillgrove Mine Access Rd mentioned above.

6. Hours of operation: The time of crushing, screening, and haul activities must be limited to reasonable hours. 6am to midnight Monday to Saturday is not reasonable. Sales and Loading activities are potentially 24/7, which means trucks through the two affected towns could be 24/7. This is not at all reasonable. The impact on local residents will be untenable, with an increase in noise, dust, vibration & risk to public safety.

The hours of operation must be significantly reduced.

7. Environmental issues: The KCLG is very keen to see environmental benefits from this project. We appreciate that Hanson are planting screening trees that are locally provenanced. The rehabilitation of the quarry sites should be continuous and seen as an opportunity to improve the habitat for local flora & fauna. Diamond Fire-tail Finches (rare) are known to the areas both to the West (Ironstone Range Road), towards Sawpit Gully Road and the east (Kanmantoo woodlands). More vegetation type needed for these birds to survive would be a positive outcome.

*Correa glabra var turnbullii* is present along the Dawesley creek and although not listed nationally, is a significant rare plant species for the area. If present in the footprint then it should have cutting material collected and propagated.

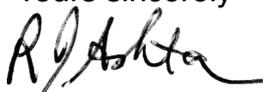
The removal of weeds, particularly the Spiny Rush, on the whole site is essential. If trucks are entering the creek-line where Spiny Rush is present then they need to have a proper wash-down facility to lessen potential spread to other catchments.

SEB offsets should be used in the local area. There have been extensive efforts in the district to link corridors of native habitat. The SEB Offsets should be used to add to this activity. The Goolwa-to-Wellington Local Action Planning Association (GWLAP) would be an excellent advisory body in this regard.

In the opinion of the KCLG the Kanmantoo Bluestone Quarry MLP in its present form is not fair and equitable. It is not in the interests of all stakeholders and the information has not been inclusive, or timely. The social costs to the Kanmantoo and Callington communities outweigh the social benefits. The proposed project life, in particular, reduces flexibility & the possibility of changed circumstances.

Thank you again for the opportunity to make a submission to this application.

Yours sincerely



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