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7 July 2011

The Assessment Manager
Development Assessment Unit
Scenic Rim Regional Council
PO Box 25
BEAUDESERT QLD 4285

Dear Sir,

Submission of objection for ERA
File Number: 020-030-002973
DA number: 30002973

Please find attached a formal objection by the Logan and Albert Conservation Association for the proposed Material Change of Use for an ERA for a 330 hectare extractive basalt quarry on for Lot 1 on W312151, Lot 42 on SP108595, Lot 7 on RP853204, Lot 6 on RP 853203 and Lot 3 on RP 853203 Glandore Road and Erin View Rd , Kerry near Beaudesert in the Scenic Rim Regional Council.

The Logan and Albert Conservation Association would like to lodge its very strong **objection** to this development application. Our reasons for this objection are outlined in detail in attached submission. We recommend that the Scenic Rim Regional Council does not approve this Development Application.

The Logan and Albert Conservation Association (LACA) is a volunteer run community group that has been operating in the Logan and Albert area for over 20 years. Our membership extends over the Logan City Council and Scenic Rim Regional Council areas.

Our organisation is concerned that significant information has not been fully disclosed and that there are considerable issues and impacts that have not be reported, and thus have not been considered at this stage. We regard this as a piecemeal application which denies Council and the community full disclosure of the information that is needed to understand and mitigate all of the **very significant impacts** that this DA poses. We

strongly urge the Scenic Rim Regional Council to **not approve** this Development Application.

Yours sincerely

Anne Page (BA Hons Dip Ed M Env Mgt)
President
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Since its inception in 1989, LACA has worked with our community, council, industry, and government to develop understanding, commitment and actions for more sustainable living.

LACA aims...

- *To play an active role in the protection and enhancement of the environment.*
- *To promote the concept of environmental sustainability as an essential criterion of planning for development.*
- *To educate and inform the community on all aspects of conservation.*
- *To research and report on current and proposed activities likely to affect the local environment.*
- *To encourage the widest possible public consultation and informed debate on matters of conservation and environmental importance to the local community.*

The Logan and Albert Conservation Association Inc (LACA) objects to **DA number: 30002973** and strongly urges the Scenic Rim Regional Council to **not approve** this Development Application. LACA is concerned that significant information has not been fully disclosed to the Scenic Rim Regional Council or the community, and that there are considerable issues and impacts that have not been reported by this stage.

The omission of

- needs assessment
- biodiversity and ecological assessment reports (including regrowth vegetation and endangered, threatened and vulnerable species),
- air quality reports,
- noise pollution reports,
- geotechnical report (eg blasting, vibrations, erosive soils, landslip risks),
- a Stormwater Management Plan that does not fully consider all potential catchment impacts including flood modeling
- visual and scenic impact assessment
- cultural heritage surveys and assessment
- community and social impact assessment

clearly demonstrates that **the applicant is not fully addressing their environmental duty of care under the Environmental Protection Act.**

We regard this as a piecemeal application which denies Council and the community full disclosure of the information that is needed to understand all of the very significant environmental, social and economic impacts that this Development Application poses. We strongly urge the Scenic Rim Regional Council to **not approve** this Development Application.

A **material change of use** should provide an overriding benefit to the State or regional community in social, economic or ecological terms that outweighs the community benefit of maintaining the long-term availability of the extractive resource. This DA has significant social, economic and ecological impacts that will have short term and long term negative impacts for the community and South-east Queensland. **It should not be approved.**

1.0 PUBLIC NOTIFICATION CONCERNS

In relation to the original public notice period that was to close on 7 July 2011

1. The application did not comply with the SPA legislation, which states that the notification of development signs are to be displayed within 5 days from the start of the notification period. As at 23 June 2011, the only signs to appear on the road reserve(s) were the signs notifying of the proposed road closure of Glandore Road e.g. such as those located at the end of Erin View Rd . Some signs were placed on road reserves that had locked gates (eg Erin View Rd,

Glandore Rd) where the community could not access the area to see the signs.
2. Consequently the notification of development was not in place within the timeframe as required under the SPA legislation.

2.0 SIZE & INCOMPATIBLE LANDUSE

1.This application is for an is for an extractive quarry to cover 330 hectares (800 + acres). This size and industrial land use is not compatible with the existing rural zone activities such as small cropping, farming, horticultural pursuits, organic farms and ecotourism which support the nearby local rural communities of Kerry, Laravale and Josephville.

2.This development does not support or enhance the local area amenity and rural and semi rural activities. It does not add to the ecotourist values of the area. The quarry will be viewed by and blasting and sirens heard by the local residents, community, daytrippers, and other tourists driving along Kerry Road north and south of the intersection with Erin View Rd, Kerry. Blasting, and possible processing operations as well and 65 tonne quarry vehicles will be seen and heard by the local residents, community, daytrippers, and other tourists driving along Christmas Creek Road. These roads are important gateways for campers, bushwalkers and other tourists.

3.Up to 125 quarry trucks per day are proposed and operations are proposed for 24 hours per day, 7 days a week and 350 days per year. Increased heavy vehicle traffic and noise is in conflict with the rural character of the areas of Kerry and Laravale.

4.This application should not be approved.

3.0 CATCHMENT IMPACTS

1. The application does not adequately report or address the significant impacts that will occur to all catchments associated with the footprint of the proposed extractive quarry including the area not for extraction (as indicated by the Quarry Layout Plan in the Stormwater Management Plan) . The catchments that will be potentially impacted include (but are not limited to) Spring Creek, Erisdale Creek, Urch's Creek, Logan River and Albert River (**Map 1**) . Consequently, the current application has not fully considered all impacts or mitigation that would be needed at this stage of the development application.

2. The Stormwater Management Plan that has been provided by the applicant, considers only the catchment of Spring Creek that flows towards Erin View Rd (the creek in closest proximity to Dam 1 and 2) which flows into the Albert River. There is absolutely no reference in the whole development application to two additional creek catchments, the potential impacts on these or mitigation of impacts for these creeks locally as known Erisdale Creek and Urch's Creek (located to the north and south of Glandore Rd) which lie on the western side of the proposed development area.

MAP 1 - Rivers and Creeks

3. The existing and historical rural landuse in the area of the proposed development application has altered the natural landscape, however vegetation still remains along ridgelines, creeks and rivers. This remaining vegetation is of significance because it provides refugia, shelter and water sources for the native flora and fauna that persist in the area. Regrowth vegetation in the area is also of significance as it also provides shelter and food sources for local wildlife e.g. quolls, koalas, rock wallabies, kangaroos, wallabies, echidna and a variety of bird species including rainforest species.
4. In the Healthy Waterways Report Card in 2010, the Logan River Catchment received a D+ with streams generally in a poor condition. The Logan Estuary received a Fail in 2010 and 2009 with poor water quality, high nutrient concentrations, high turbidity and low dissolved oxygen concentrations. In 2010 the Albert River achieved a B- (which had dropped from an A- in 2009). However, the Albert Estuary attained a Fail in 2010 and 2009. Concerns for the Albert Estuary included poor water quality with continued high nutrients and turbidity and low dissolved oxygen in the lower estuary. Increased erosion and stormwater runoff from this proposed activity will not assist in the improvement of the conditions of either the Albert or Logan Rivers. This development proposal will not assist in achieving the NRM Targets for Logan and Albert rivers or for South-east Queensland.

4.0 EROSIIVE SOILS & LANDSLIPS

The area proposed for the extractive quarry has high and very high erosive soils (**Map 2**) . There is also landslip risk in this area. However, neither of these aspects have been fully investigated by the applicant. There is no full geotechnical report that comments on landslip risk, or provides details of these risks with the details of the blasting and extraction that is being proposed for the quarry. LACA finds it very disturbing that comments like “ a detailed geotechnical report will be provided at a later stage” are made in documents provided by the applicant. How can the community comment on a DA during public notice without full disclosure of this information. How can Scenic Rim Regional Council make a decision about this DA without full disclosure of this information?

LACA recommends that this development should not be approved.

5.0 STORMWATER MANAGEMENT PLAN (SMP) CONCERNS

1. The Stormwater Management Plan (SMP) that has been provided by the applicant, considers only the catchment of Spring Creek that flows towards Erin View Rd (the creek in closest proximity to Dam 1 and 2) which flows into the Albert River. There is absolutely no reference in the whole development application to two additional creek catchments, the potential impacts on these or mitigation of impacts for these creeks locally as known Erisdale Creek and Urch's Creek (located to the north and south of Glandore Rd) which lie on the western side of the proposed development area.

MAP 2 Erosion Risk

No stormwater management mitigation or recommendations are made in the applicant's Stormwater Management Plan (SMP) for the lots other than Lot 1 Lot 1 on W312151 and Lot 42 on SP108595 (Spring Creek catchment). No reference to any stormwater mitigation for the western side of quarry for Erisdale catchment is proposed. Some recommendations in the applicant's own SMP conflict in relation to management of overflow and stormwater from the proposed stockpile location.

2. The Stormwater Management Plan has used incomplete rainfall charts – no data is presented for August to December 2010 or January to June 2011 which would have included higher rainfall events. This information has not been provided and should be provided in this document.

The Bureau of Meteorology only has one operational Station at Central Kerry as the Christmas Creek Rd station was closed in January 2009. Yet data from 2008 (Appendix A) for Christmas Creek Rd shows much higher rainfall received in 2008 for the period of January to May for Christmas Creek Rd station than for the 2010 period of January to May for the Central Kerry Station. Consequently it is critical that stormwater flow and runoff issues for the area west and south-west of the quarry site also be evaluated and mitigated as they are currently not given any consideration by the applicant's SMP report. The SMP is incomplete at this stage and does not fully account for the management or mitigation of stormwater for the all of the catchments surrounding the proposed quarry site, especially Erisdale Creek and Urch's Creek.

3. No flood modelling has been conducted in relation to the Stormwater Management Plan. No water flow information is provided for Erisdale Creek or Urch's Creek and no flood modeling for Spring Creek, Erisdale Creek or Urch's Creek have been provided to date.

4. In the SMP the unknowns with regard to the scale and rate of operation and the lack of guidance or parameters for the operational features of the proposed quarry site (eg exact location of stockpile, processing), means that there is no way of knowing how effective the stormwater management measures might be. Further information is required in respect of:

- A detailed site layout to indicate where the stockpile/s will be located, where retention ponds will be located
- Volume and rate of quarry extraction
- Volume and rate of water utilisation associated with the extraction and washing processes
- Formula by which the size and capacity of the various elements (soakage pits, temporary retention basins, bunding, washing areas, etc.) will be designed
- rainfall event at which the various elements (including those noted above) will be overtopped
- Dilution rate and likely incidence of escaped contaminants and/or sediments in such an overtopping event

5. The applicant's Stormwater Management Plan does not adequately consider all of the runoff and stormwater issues pertaining to the proposed quarry activities or their mitigation. The impacts on Erisdale Creek (south of Glandore Rd) and Urch's Creek (north of Glandore Rd) have not been addressed or mitigations proposed.

6. There is no current report on current water quality. There is no current information provided about the current water quality of the catchments of Spring Creek, Erisdale Creek or Urch's Creek.

7. There is no reference to water quality monitoring protocols or frequency of measurements or reports after extraction.

8. The Stormwater Management Plan (SMP) does not give any information about possible stormwater or sediment impacts west of the proposed quarry or its proposed mitigation. For example, in the SMP the Quarry Layout Plan indicates that the processing and stockpiling area (approx 400 m x 600m) is proposed for Lot 7 on RP853204 where it would be located at the headwaters of Erisdale Creek. Yet in the SMP it states that the stockpile should be located not to have impacts on catchments. The current proposed location of the stockpile area will impact on the headwaters of Erisdale Creek which flows downstream to JD Todd Bridge and into the Logan River.

9. The SMP (p 1) states that " detailed geotechnical design and quarry planning has yet to be undertaken for the proposed quarry and so detailed plans are not yet appropriate" ..." It is expected that as the detail of the quarry planning be developed , more detailed stormwater management plans will be developed and implemented on site." – the above points 2 and 8 above indicate why this should not be the case and why the DA must not be approved because all information regarding possible stormwater and catchment impacts have not been fully disclosed. See p 2 last paragraph of the SMP as well - in fact the whole SMP has statements about more detail at later stages. The community has the right to know this information now and so does Council or any state government department **before** making a decision about this DA.

10. SMP (p 5) states " it is anticipated that the permanent processing area will be self contained and not connected to the stormwater system on the eastern portion of the site. It is expected that amendments to the SMP will be required to accommodate the detailed planning and design of this permanent areas once determined". In the SMP there is no reference to any potential stormwater impacts on Erisdale Creek or its mitigation (west of the proposed stockpile and processing area).

11. SMP (p 12) See last paragraph in relation to stockpile management and appendix map showing proposed location of stockpile " sediment control barriers are to be installed down-slope of stockpiles and concentrated stormwater flows are to be directed around stockpiles. Stockpiles are to be located clear of drainage lines/watercourse and any position from which they could be washed into a water course (Markwell Creek) or drainage lines" - **The Markwell Creek referred to in the SMP according to local residents is actually known as Spring Creek** . This creek flows through the quarry site in a NE direction into Dam 1 and then downstream in an easterly direction from the site to the Albert River. There is

absolutely no reference to the catchment impacts of stormwater or any management plan for the catchments to the north and south of Glandore Rd (known as Erisdale Creek and Urch's Creek by locals). So based on the current SMP not all of the potential Stormwater impacts related to the proposed site and activities have been adequately considered or mitigated at this stage.

12. This application should not be approved.

6.0 FLORA AND FAUNA

1. No report has been provided by the applicant that has a full ecological or biodiversity assessment that details the existing native flora and fauna, migratory species, endangered, threatened or vulnerable species, impacts or mitigation. Thus the full impacts on or mitigation for native flora and fauna has not been truly established. **This is not a best practice development application. This also does not fulfil the environmental duty of care that the applicant has under the Environment Protection Act.**
2. Locally or regionally significant endangered, threatened or vulnerable species **have not** been identified within the proposed DA sites, local area or in terms of the regional connectivity. The proposed development site lies strategically located between the Albert River and the Logan River. The proposed development lies on an elevated ridgeline which also may indicate significant species may inhabit this area eg **rock wallabies**, unique plant species, unique insect species. Local residents have reported sightings of **quolls** (EPBC listed as an Endangered species, NCA listed as vulnerable), **koalas** (NCA listed as Vulnerable), **glossy black cockatoos** (NCA listed as vulnerable), nesting **wedge tail eagles, phascogales**.
3. Local residents have reported
 - i. wildlife in the vicinity of **Erinview Road and Glendore Road, Kerry, Beaudesert**. These include **glossy black cockatoos**(about 6 in the flock around November 2006, 2008, 2010), **wedge-tailed eagles** using the area all year for the last 10 years to date and for nesting (photos available), **koalas** (photos available- various times) a **phascogales**(particularly on the 23/07/2007 and other dates photos), **quolls** around this time and November 2007 and 6 January 2008. **Rock wallabies**, other wallaby species, kangaroos and echidnas at various times over the last 10 years and in recent times have also been observed by local residents.
 - ii. Pascale De Gier reported a quoll as road kill near Laravale located at GPS . between 28° 01'40.88" S - 152° 57'09.35" E and 28° 01'40.43" S - 152° 57'17.67" E (little bit more to the latter)
4. Issues raised 1, 2, 3 above all indicate that the statement made by Blue Green Brown in their Environmental Management Plan (January 2011 p 6) "**however it should be noted that given the historic clearing of vegetation and agricultural land uses prominent in this locality, it is considered unlikely that this proposal will have a significant impact on Matters of National Significance**" is not correct.
5. The Environmental Management Plan clearly states on p6 that "**no detailed flora and fauna studies have been undertaken on the site**" and that "**assessment**

against Significant Impact Guidelines 1.1 for Matters of National Significance (Commonwealth of Australia 2009) has not been undertaken”. This is not environmental best practice. Quolls are listed as endangered under EPBC Act. Communication with an officer from the Federal Government’s Department of Sustainability and Environment, Water, Population and Communities on 6 July 2011 via email confirmed that they had communicated “[Wolter Rowlands are aware of their EPBC Act requirements. They want to await the outcome of the state and local government processes before deciding on making a referral under the EPBC Act.](#)”

6. Extensive vegetation clearing will be required for the proposed 100 metre haul road and quarry site (refer to Stormwater Management Plan). In a rural area, where vegetation has been historically cleared for agricultural activities, the remaining vegetation (including regrowth vegetation) and riparian corridors are of high significance for local biodiversity and species as well as for ecosystem function (Map 3 and 4) . The clearing of 100 metres will fragment the remaining vegetation and regrowth vegetation with negative impacts on local fauna, local and regional habitat connectivity and biodiversity.

7. Sirens, blasting, vibrations, processing operations , operational works, noise and heavy vehicle and other vehicular movement through the DA properties, all have the potential to disturb migration, feeding, breeding and nesting habits of native fauna that may currently utilise the local (eg Kerry and Laravale) and regional areas.

8. Essential regrowth habitat database indicates Koalas occur in the area. Local residents to the east of the proposed quarry at Spring Creek and Erin View Rd, as well on the western side of the proposed development area east of Christmas Creek Rd also confirm that koalas utilize this habitat.

9. Increased numbers of quarry trucks (65 tonnes when loaded) , work and delivery vehicles, speed, and increased road widths (the internal haulage route is proposed to be 100 metres wide in Stormwater Management Plan) – will result in increased road kill along local and state roads and declining biodiversity. Any widening of local and state roads such as Christmas Creek Rd and Mt Lindesay highway may also result in loss of local habitat.

10. No information or surveys have been provided in relation to frogs, reptiles, platypus.

11. This application should not be approved.

MAP 3 Remnant Vegetation and Regrowth

MAP 4 Ecosystem Function

7.0 ECOSYSTEM FUNCTIONS

The application makes no reference to ecosystem services.

Ecosystem services are the goods and services provided by ecosystems that benefit, sustain and support the wellbeing of people and the SEQ region. They include the production of food and medicines, regulation of climate and disease, provision of productive soils, clean water and air, opportunities for recreation and spiritual benefits. (Qld Government 2009 South East Queensland Regional Plan 2009-2031).

Ecosystem services are derived from ecosystem functions and the biophysical elements of the landscape e.g. soils, vegetation, water, topography. There are 19 ecosystem functions as derived from the SEQ Ecosystem Services Framework, as listed in Table 1.

Table 1: List of Ecosystem Functions, SEQ Ecosystem Services Framework

Ecosystem Function	Description
EF1	Gas Regulation
EF2	Climate Regulation
EF3	Disturbance Regulation
EF4	Water Regulation
EF5	Soil Retention
EF6	Nutrient Regulation
EF7	Waste Treatment
EF8	Pollination
EF9	Biological Control
EF10	Barrier Effect of Vegetation
EF11	Supporting Habitats
EF12	Soil Formation
EF13	Food
EF14	Raw Materials
EF15	Water Supply
EF16	Genetic Resources
EF17	Shade & Shelter
EF18	Pharmacological Resources
EF19	Landscape Opportunity

Map 4 shows the main contributing ecosystem functions in the area proposed for the Extractive Quarry were Water Regulation (EF4), Soil Retention (EF5), Nutrient Regulation (EF6), Waste Treatment (EF7), Barrier Effect of Vegetation (EF10) and Landscape Opportunity (EF19).

The South East Queensland Regional Plan refers to 4.3 Ecosystem Services, with supporting Principles, Policy and Programs. Policy 4.3.1 is 'Protect areas supplying

high levels of ecosystem services from development impacts.’ Ecosystem services are derived from areas with ecosystem function.

The DA area has important ecosystem functions that should be protected. This application should not be approved.

8.0 AIR POLLUTION

1. No air quality or pollution modelling or measurements for current air quality or predicted air quality have been undertaken by the applicant. There are public health implications (eg increased respiratory illnesses) from blasting, quarrying, processing, stockpile, haulage and other activities. DERM usually requires information about dust particulate sizes, wind direction and air quality modelling . In the documents available for public scrutiny at Scenic Rim Regional Council, none of this information or air quality modeling or prediction has been provided by the applicant.

Especially in relation to –

- Current air quality and air quality modelling from proposed future operations to show particulate impacts
- Modeling should consider but not be limited to prevailing winds, seasonal winds, extreme wind events
- Sizes of particulate matter including less than PM₁₀ (which are currently known to have the greatest impact on human health)
- Distance to closest residents and communities of Laravale, Josephville, Kerry
- Impacts under extreme weather events (extreme weather events have occurred historically in the Kerry area of Spring Creek such as a tornado about 9 years ago with winds of approximately or greater than 180 km/hour as reported by local residents)
- Air quality impacts along haulage routes

One local resident on the Kerry side of the proposed quarry reported how the winds can blow from SW to NE/E through the valley of Spring Creek. There was a tornado about 9 years ago that had winds over 180km/hour that caused damage to large farm sheds. Wind direction and strength and dust particulate size obviously influences the distance that the dust particles can travel - the smaller/finer dust particles (less than PM₁₀)are the ones that can be the most harmful to human health because they can be inhaled and can lodge inside air sacs in human lungs. This modelling would need to consider the distance to neighbouring inhabited houses and local schools and typical as well as extreme weather events..

2. There is research that currently exists that has demonstrated there is a potential risk that dust and air pollution particles cause health impacts from quarry activities such as increased respiratory illnesses (eg asthma,) especially for those who have existing respiratory and other medical conditions or are at a high risk (eg children, elderly, people with existing medical conditions and respiratory illnesses) . The type of material being mined or quarried can influence the types of health issues that result. The neighbouring residents and rural communities of Kerry, Laravale and Josephville will have higher rates of exposure to air pollutants and particulate matter from this proposed extractive quarry.

3. Dust and particulate matter may also have negative impacts not only in proximity to the quarry but also to sensitive receivers along the haulage route who may also be affected.
4. All properties in the area rely on rain/ tank water as their only potable water supply. Increased dust levels will pollute potable water supplies for local residents.
5. LACA is extremely concerned that in the reports provided by consultants for the applicant comments in relation to the non provision of air quality modeling have been given like **“such modeling can be undertaken in due course and in response to a condition of any forthcoming development approval”**.

Under the Environment Protection Act the applicant has an environmental duty of care. The non provision of air quality modeling or reports is a clear indication that this duty of care has not been fulfilled. The community and council have the right to have information regarding environmental and public health and safety risks fully disclosed by applicants in relation to their DAs. The non provision of this information has meant that the community has gone through the public notice phase and has had to make objections without full disclosure of information by the applicant. Council is also in this same position in relation to their assessment of this DA. This is an unacceptable risk to the community, environment and to Council.

6. This application should not be approved.

9.0 NOISE POLLUTION

1. No noise modeling or measurements have been undertaken by the applicant to consider the impacts on the communities of Kerry and Laravale, consideration of noise under different weather conditions and times of day, impacts of temperature inversions, topographical conditions, or impacts to sensitive receptors along the haulage route.
2. There is research that currently exists that demonstrates there is the potential of noise to cause health impacts.
3. The current rural area at Kerry and Laravale has a low natural ambient noise level and this has not been measured for baseline information or modeling by the applicant.
4. There is no information provided in the DA reports on noise emissions that will be produced from sirens, blasting, drilling, processing, crushing, screening, loading and also from fully loaded and empty quarry truck movements on site and off site (eg along local and state roads used for haulage routes). **The current application has made no reference to the noise impacts from the proposed extractive activities and has made no comment on how these impacts would be reduced or mitigated.**
5. In the current DA these noise emissions will occur during the proposed operational hours - 24 hours a day, 7 days a week , 24 hours a day . This is unacceptable for the community. The application should not be approved.

6. Adverse Noise impacts will occur - there will be explosives used and blasting at the site. This will adversely affect the living conditions of the residents, and may impact on domestic livestock, economic income to local farmers (eg cows and horses) and native animals. **The current application has made no reference to the noise impacts from the proposed extractive activities and has made no comment on how these impacts would be reduced or mitigated.** The documents provided by the applicant states “ **the potential for noise from blasting and plant and equipment to impact on neighbours will be minor** “ (See EMP 19/1/10 letter re amended DA from Wolter Rowlands to Megan Stokes SRRC) .

7. This application should not be approved.

10.0 BLASTING CONCERNS

1. No details regarding blasting to be undertaken on the site are given (other than the Blasting Protocols provided in an appendix in the Environmental Management Plan) .
2. Information has not been fully disclosed in relation to blasting activities as stated in documents provided by consultants for the applicant “**further details on blasting activities can be provided in response to a condition of any forthcoming development approval**”. The community and council have the right to have information regarding to blasting fully disclosed by the applicant in relation to their DA. The non provision of this information has meant that the community has gone through the public notice phase and has had to make objections without full disclosure of information by the applicant. Council is also in this same position in relation to their assessment of this DA.
3. In the **Environmental Management Plan** (January 2011) provided by the applicant (which is not in final format) the **Blasting Protocol** is provided as Appendix F in this document. The blasting protocol stated that “where possible , a blast schedule will be prepared and provided by mail to residents of dwellings within a 1 km radius” . Using Google Earth, the distance of the closest neighbouring residents to the NE, SE, WNW and WSW of the proposed quarry stage 1- 4 area is approximately 1- 5 km . this means that under the current Blasting Protocols proposed in the DA documents, no neighbouring residents would receive this information by mail.
4. In the current **Blasting Protocol** (see Appendix F ,Environmental Management Plan, January 2011) if there is a variance in the blast schedule,” residents within 1 km of the quarry will be informed by telephone 24 hours in advance of proposed blasting”. Using Google Earth, the distance of the closest neighbouring residents to the NE, SE, WNW and WSW of the proposed quarry stage 1- 4 area is approximately 1- 5 km . this means that under the current Blasting Protocols proposed in the DA documents, no neighbouring residents would receive this information.

5. A siren is to be sounded 3 minutes prior to each blast (p 4 Appendix F Blasting Protocol ,Environmental Management Plan ,January 2011)
6. This application should not be approved.

11.0 TRAFFIC AND ROADS

1. The quarry is proposed to have approximately 125 quarry trucks per day (22.5 tonnes unloaded and 62.5 tonnes loaded) with impacts on surrounding and en route communities – with environmental and infrastructure stresses on Kerry Road, Erin View Road, Glandore Road, Christmas Creek Road and Mt Lindesay Hwy south and north, Beaudesert township roads.
2. Existing residents on Kerry Road have reported that currently “ *Every time a truck and dog goes past, our windows shake and we are right away from the road*”.The impacts on residents along Glandore Rd, Christmas Creek Rd and all other roads along the haulage route will be even greater as the number of quarry trucks increases.
3. **The local communities have expressed concern about who is going to monitor the quarry trucks to make sure that they go via Christmas Creek Road rather than taking a shortcut via Erin View Road?** As the cost of fuel increases, there is a distinct likelihood that there will be ‘rat runners’ who will not use the haulage route that is described in the development application.
4. Increased quarry truck traffic will have negative impacts on neighbouring residents, communities of Kerry and Laravale and communities along the proposed haulage route to be used. Environmental and infrastructure stresses exist now and will be exacerbated on Kerry Road, Erin View Road, Glandore Road, Christmas Creek Road and Mt Lindesay Hwy south and north, **and local roads in** Beaudesert township roads. This DA is proposed to commence in 2012 which is proposed before the future town bypass.
5. The request by the applicant to **formally close Glandore Rd (a road reserve that has been used by local residents and visitors in the past for horseriding and hiking) is not in the public’s best interest** and should not be approved.
6. This application should not be approved.

12.0 VIBRATION IMPACTS

No detailed geotechnical report has been provided with any details about blasting, vibrations, impacts or landslip risk . This will adversely affect foundations, built structures on surrounding properties, livestock, impacts on environment and wildlife.

13.0 ECONOMIC IMPACTS

There is no overwhelming economic benefit to the community. It will adversely impact the legal economic activities of the other rural pursuits in the area of Kerry and Laravale eg farming and ecotourism. Other economic costs will be incurred long term such as increased cost of local council road construction and maintenance, negative impacts on local Beaudesert Town businesses from increased difficulties for people to access these businesses safely with more quarry trucks using the roads through Beaudesert Township eg Brisbane St and Telemon St. Negative impacts to tourism will also occur.

14.0 REHABILITATION OF SITE

LACA objects to the MCU proposed in this development application and does not in anyway support this proposed development. All background reports have not been provided to the public or Council at this public notice stage so not all information about the DA and its operations have been revealed to the community or Council.

The lack of detailed information about the DA, the exact timing of stages, the exact final location of all site quarrying, blasting, processing, stockpiles, retention ponds, catchment impacts, haulage road and access road designs means, the absence of specific ecological assessment and many other reports makes it difficult for the community to comment specifically in relation to the Rehabilitation and Landscape Plan provided by the applicant.

LACA comments at this stage in relation to the Rehabilitation and Landscape Plan are

- Ongoing rehabilitation should be undertaken.
- Vegetation planting to buffer and protect the amenity of local residents and the environment and to provide refuge for native fauna should be planted and established prior to any commencement of operations
- Only locally endemic species should be used
- Weed management should not include aerial spraying

15.0 WATER & SEWERAGE CONCERNS

On-site potable water, portaloos and waste will need removed from the site. The water and sewerage is proposed to be trucked into and out of the site. This also creates extra vehicle deliveries to the site – which roads will these vehicle use to access the site? It also poses public safety and health issues should there be an accident with portaloos and waste being transported from the site.

The application does not address these concerns and should not be approved.

16.0 LIFESTYLE & AMENITY CONCERNS

1. The quarry is requesting approval for 24 hour operations, 7 days a week and 350 days /year. This is unacceptable to the rural activities in the area and to the existing residents. Current and future tourists (daytrippers and overnight visitors) will also not consider this as suitable operations in an ecotourist destination that they would want to continue to visit. The Kerry and Christmas Creek areas already are popular with campers and day trippers. Tourism is a critical industry that is valuable to these communities and to the SRRC. This proposed 330 hectare extractive quarry will

adversely affect the character and amenity of the tourist area of the Christmas Creek and Kerry valleys and should not be approved.

2. Impacts of increased traffic on local and state roads especially Christmas Creek Rd, Mt Lindesay Highway, Brisbane St, Beaudesert – Boonah Rd will pose increased public safety risks with greater volumes of 65 tonne loaded quarry truck traffic. This has not been addressed.
3. There will be greater traffic congestion through intersections with traffic lights along Brisbane Rd, especially when considering the length of some quarry truck vehicles. Some of these intersections are already unable to cope with local traffic now. This has not been addressed.
4. Impacts (noise, air quality, increased risk to public safety) from increased numbers of quarry trucks traveling past schools such as St Mary's, Laravale SS (which is still actively used for education purposes), Beaudesert State High School, Woodhill SS and Gleneagle SS have not been addressed.
5. These same impacts will affect a number of Aged care facilities, nursing homes and retirement villages also located on these B-double truck routes, i.e. Wongaburra, Beaudesert Garden Estate, Albert Gardens Country Retirement Village, Star Gardens Aged Care Facility and Jymbilung House in Beaudesert township alone.
6. Light pollution – A 24 hour operation will mean lights will need to be used all night. This will affect the living conditions of residents, domestic animals and native animals.
7. Visual and scenic amenity impacts have not been assessed eg. along Kerry Rd, along Christmas Creek Rd.

17.0 ROAD SAFETY AND TRAFFIC MANAGEMENT CONCERNS

1. It is our opinion that the roads on the B-double vehicle routes to and from this Quarry site will not adequately withstand the extra heavy traffic. Evidence is already apparent from the present increased heavy vehicle movement in the Council area, namely Mt Lindesay Hwy (north and south of town), Telemon St, Brisbane St, William St, Beaudesert-Beenleigh Road, Kerry Road, Bromelton St, Beaudesert-Boonah Rd, Bromelton House Road, Alan Creek Road Gleneagle for examples. These roads are breaking up and already indicate safety and commuter vehicle damage concerns.

2. Traffic congestion through Beaudesert town will become more intense than it already is now. Street intersections on Telemon St, Brisbane St, William St, Beaudesert-Beenleigh Rd and Bromelton St and Mt Lindesay Hwy (north and south) will become very congested and this poses very serious road and public safety issues. Have the Beaudesert Police been informed and consulted in relation to their advice about road safety issues and concerns in relation to the DA?

3. Already, traffic conditions at the street lights in the centre of town are difficult with the present increase in heavy vehicle movement. The expected increase again from the

proposed Quarry activity will create greater problems in this area. This also will have negative economic impacts on businesses in Beaudesert. Customers will be unable to safely park in the town streets, and pedestrians will be exposed to the dust and emissions of this extra heavy vehicle traffic.

4. Although the proposed town by-pass addresses some of the above issues when is the timeline for the town by-pass? The community and businesses from Enrichts Sawmill and further north will still be adversely affected as outlined in this submission. The town by-pass does not change the traffic conditions from the east direction through town either and this also needs to be considered in relation to road and traffic congestion and safety issues in relation to this DA.

5. There will be a significant increase in traffic movement as a result of the quarry which will include heavy quarry trucks which creates an increased risk to public safety. The haulage route is proposed to go via Glandore Rd and Christmas Creek Rd. glandore Rd was never designed to be a Designated Haulage Road. Christmas Creek Rd also is not built to cater for up to 125 quarry trucks per day, 7 days a week, 350 days a year. The intersection of Christma Creek Rd and the Mt Lindesay Highway has also not been designed to cater for this increased demand. The intended commencement date by the applicant is 2012, but how can the matter of road design and road safety issues for local and state roads be addressed in that time? How will public safety concerns be addressed in relation to these matters?

6. Christmas Creek , Mt Lindesay Highway and the Beaudesert-Bromelton Rd are school bus routes. There is already little space for the bus to pulloff the road for children to board and depart the bus. With an increase in heavy quarry trucks as proposed in this development application, there is a greater risk of an accident involving trucks and school buses, especially if a school bus and a quarry truck are passing each other in opposite directions. The haulage route described in the DA states that the trucks will turn left off the Mt Lindesay Highway into Beaudesert-Bromelton Rd. This route poses an greater safety risks to children, parents and staff of St Mary's school. Laravale State School is also along the proposed haulage route of the quarry vehicles from this proposed quarry.

7. Kerry Valley, Christmas Creek Valley and Lamington National Park areas already have established and growing tourism industries. Tourists, especially those towing caravans or camper trailers will not be safe travelling along local roads like Christmas Creek Rd and other roads that have not been designed or built to cater for increased numbers and frequency of quarry trucks. Tourists will be deterred from visiting the Scenic Rim if this development proceeds, which will result in job loss and loss of revenue for the tourism industry and the region.

This development application does not address these issues and the application should be rejected by Council.

18.0 INFORMATION NOT PROVIDED

Information has not been fully disclosed to the community or Council by the application.

This includes but is not limited to –

- No detailed site plan has been provided that accurately indicates the locations of all features to be included as part of the site development and DA
- No map that indicates specific locations of retention ponds, or water flow that will flow west or south to south-west towards Erisdale Creek, Urch's Creek
- biodiversity and ecological assessment reports (including regrowth vegetation and endangered, threatened and vulnerable species, field work that includes flora and fauna assessment and seasonal surveys),
- air quality modeling and report (including current air quality, future air quality as a result of proposed operations, prevailing winds, seasonal winds, topographical influences, extreme weather event scenarios, potential impacts (social and environmental) and mitigation proposed
- noise pollution measurement, modeling and reports – including but not limited to current noise levels, future noise levels for areas of Kerry and Laravale, neighbouring residents, haulage routes to be used, potential impacts and mitigation proposed
- geotechnical report (eg blasting, vibrations, erosive soils, landslip risks)
- groundwater and hydrology impact assessments
- a Stormwater Management Plan that fully considers all potential catchment impacts (including but limited to Erisdale Creek, Urch's Creek, Logan River, Albert River)
- current water quality measurements for Spring Creek, Erisdale Creek, Urch's Creek, Logan River and Albert River (where proposed water quality impacts downstream from the proposed DA may be received) to provide baseline information
- flood modeling for Spring Creek, Erisdale Creek, Urch's Creek that includes scenarios from potential impacts of the proposed DA development on waterflow and impacts.
- A scenic amenity and visual amenity assessment
- Community and social impact assessment – including impacts on local communities and tourists
- No cultural heritage assessment

19.0 BROMELTON

This Development Application clearly indicates that the majority of material to be extracted from this proposed site is to be transported to Bromelton. A suitable quarry site should be identified within the Bromelton SDA and located there. Council should investigate this option.

20.0 COMPLIANCE CONCERNS

LACA is concerned that the Scenic Rim Regional Council does not have the personnel or financial resources to enforce compliance, so this development should not be approved by Council.